Exporter Questionnaire

Case number: 501

Product: Solid Base Angle

From: The People’s Republic of China

Investigation period: 1 January 2018 to 31 December 2018

Response due by: 4 April 2019

Case manager: Sangeeta D’souza

Phone: +61 3 8539 2451

Return completed questionnaire to: investigations2@adcommission.gov.au

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

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the Commission) is conducting an investigation into solid base angle exported to Australia from the People’s Republic of China (China).

The Commission will use the information you provide to determine normal values and export prices over the investigation period (the period). This information will determine whether solid base angle is dumped.

If you do not manufacture the goods

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

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

What happens if you do not respond to this questionnaire?

You do not have to complete the questionnaire. However, if you do not respond, do not provide all of the information sought, do not provide information within a reasonable time period, or do not allow the Commission to verify the information, we may deem your company to be an uncooperative exporter. In that case the Commission must determine a dumping margin having regard to all relevant information.

Therefore, it is in your interest to provide a complete and accurate response to this exporter questionnaire, capable of verification.

Extension requests

If you require a longer period to complete your response to this exporter questionnaire, you must submit a request to the case manager, in writing, for an extension to the due date for all or part of the questionnaire. This request must be made prior to the due date. A request for extension will be rejected if received after the due date.

When considering the extension request, the Commission will have regard to:

• the Commission’s responsibility to conduct the case in a timely and efficient manner;
• the reasons why you could not provide a response within the whole period and not only the period remaining between the request and the due date;
• ordinary business practices or commercial principles;
• the Commission’s understanding of the relevant industry;
• previous correspondence and previous dealings with your company; and
• information provided by other interested parties.


You will be informed of the decision whether your request for an extension has been rejected, granted in full or granted in part. For example, you may be granted an extension to submit all sections except for Section A or you may be granted a shorter extension than you requested.

A summary of any requests and grants of extensions to submit a response to this exporter questionnaire will be published in the public record.

Submitting a response to the exporter questionnaire
Responses to the exporter questionnaire should be lodged by email listed on the cover page. In submitting the response to the exporter questionnaire, you must answer all questions, include all attachments and spreadsheets, and provide a non-confidential version of your response to this exporter questionnaire.

If your response to this exporter questionnaire contains major deficiencies that, in the Commissioner’s view, cannot be quickly and easily rectified in a further response, then your company may be deemed as an uncooperative exporter.

Confidential and non-confidential responses

You are required to lodge a confidential version (for official use only) and a non-confidential version (for public record) of your response to this exporter questionnaire by the due date. Please ensure that each page of information you provide is clearly marked either “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, and must contain sufficient detail to allow a reasonable understanding of the substance of the information, but does not breach confidentiality nor adversely affect those interests.

A person is not required to provide a summary for the public record if the Commission can be satisfied that no such summary can be given that would allow a reasonable understanding of the substance of the information.

All submissions are required to have a bracketed explanation of deleted or blacked out information for the non-confidential version of the submission. An example of a statement to accompany deleted/blacked out text is:

[Explanation of cost allocation through the divisions, by reference to machine hours or weight].

If such an explanation is not provided, the Commission may disregard the information in the submission. Where the public record version of your response to the exporter questionnaire does not contain sufficient detail, your company may be deemed to have significantly impeded the case and be deemed an uncooperative exporter.

Verification of the information that you supply

The Commission may wish to conduct a visit to your company to verify your questionnaire response for completeness, relevance and accuracy of the information to your company’s records.

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

Any verification visit typically commences approximately 2 to 4 weeks after the due date of the response to the exporter questionnaire. To assist with planning of a verification visit, please contact the case manager as soon as possible for a potential verification date to be scheduled.

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

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

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

You will be provided with an opportunity to comment on the accuracy and confidentiality of the verification report prior to its publication on the public record.
The Commission may elect to undertake an alternative verification methodology than an on-site verification to satisfy itself of the completeness, relevance and accuracy of the data.

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

**Important instructions for preparing your response**

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

- All questions must be answered in English. An English translation must be provided for documents not originally in English.

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

- Label all attachments to your response according to the section of the questionnaire it relates to (e.g. label the chart of accounts as Attachment A-5.6)

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

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

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

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

- Where possible, electronic data should be emailed or shared with the Commission via SIGBOX, a secure online document repository. Please contact the case manager to request access to SIGBOX if required.
## CHECKLIST

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

<table>
<thead>
<tr>
<th>Attachments</th>
<th>Please tick if you have responded to all questions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Section A</strong>&lt;br&gt;Company information</td>
<td>✓</td>
</tr>
<tr>
<td><strong>Section B</strong>&lt;br&gt;Export sales to Australia</td>
<td>✓</td>
</tr>
<tr>
<td><strong>Section C</strong>&lt;br&gt;Exported goods and like goods</td>
<td>✓</td>
</tr>
<tr>
<td><strong>Section D</strong>&lt;br&gt;Domestic sales</td>
<td>✓</td>
</tr>
<tr>
<td><strong>Section E</strong>&lt;br&gt;Due allowance</td>
<td>✓</td>
</tr>
<tr>
<td><strong>Section F</strong>&lt;br&gt;Third country sales</td>
<td>✓</td>
</tr>
<tr>
<td><strong>Section G</strong>&lt;br&gt;Cost to make and sell</td>
<td>✓</td>
</tr>
<tr>
<td><strong>Section H</strong>&lt;br&gt;Particular market situation</td>
<td>✓</td>
</tr>
<tr>
<td>Non-confidential version of this response</td>
<td>✓</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Attachments</th>
<th>Please tick if you have provided spreadsheet</th>
</tr>
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<tr>
<td>B-2 Australian sales</td>
<td>✓</td>
</tr>
<tr>
<td>B-4 Upwards sales</td>
<td>✓</td>
</tr>
<tr>
<td>B-5 Upwards selling expenses</td>
<td>✓</td>
</tr>
<tr>
<td>D-2 Domestic sales</td>
<td>✓</td>
</tr>
<tr>
<td>F-2 Third country sales</td>
<td>✓</td>
</tr>
<tr>
<td>G-3 Domestic CTM</td>
<td>✓</td>
</tr>
<tr>
<td>G-4.1 SG&amp;A listing</td>
<td>✓</td>
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<tr>
<td>G-4.2 Dom SG&amp;A calculation</td>
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<td>G-5 Australian CTM</td>
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<td>G-7.2 Raw material CTM</td>
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<td>G-7.4 Raw material purchases</td>
<td>✓</td>
</tr>
<tr>
<td>G-8 Upwards costs</td>
<td>✓</td>
</tr>
</tbody>
</table>
GOODS UNDER CONSIDERATION / GOODS SUBJECT TO
ANTI-DUMPING MEASURES

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

Solid base angle, made from hot rolled coil steel, alloyed or non-alloyed, cold roll-formed, whether or not galvanised

Further information
The applicant has provided the following further information in relation to the goods under consideration:

The subject goods are typically described as “solid base angle” or “Budabar” or “B-bar” or “ribbed angle lintel” or “L-section” and are typically used as lintels.

The goods are generally supplied in section sizes being nominally 100mm x 100mm x 6mm or 150mm x 100mm x 6mm ranging in length from 900mm to 4,000mm.

Goods not covered by this application include T-bar, flat bar, perforated bar (e.g. Rendabar), and hot rolled sections; goods made from hot rolled coil steel that are subsequently subject to a further hot rolling process.

Model Control Code

As announced in ADN No. 2018/128 published on 9 August 2018, the Commission has commenced using a model control code (MCC) structure in relation to applications received for the publication of a dumping duty notice.

Details of the MCC structure for the goods are detailed in the table below. Export sales data (Section B-2), domestic sales data (Section D-2) and cost to make and sell data (Section G-3, G-4 & G-5) submitted in this response must follow this MCC structure. At a minimum, the data must report sales and cost data separately for each of the mandatory MCC categories identified by the Commission.

<table>
<thead>
<tr>
<th>Item</th>
<th>Category</th>
<th>Sub-category</th>
<th>Identifier</th>
<th>Sales Data</th>
<th>Cost data</th>
<th>Key category</th>
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<tbody>
<tr>
<td>1</td>
<td>Prime</td>
<td>Prime</td>
<td>P</td>
<td>Mandatory</td>
<td>Optional</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Non-Prime</td>
<td>N</td>
<td>Optionall</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Alloys</td>
<td>Alloved</td>
<td>A</td>
<td>Mandatory</td>
<td>Mandatory</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Non-alloyed</td>
<td>B</td>
<td>Optional</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Nominal dimension (in mm)</td>
<td>The dimensions of at least one arm of the angle is less than 100</td>
<td>D1</td>
<td>Mandatory</td>
<td>Mandatory</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>100 x 100 x 6</td>
<td>D2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>150 x 100 x 6</td>
<td>D3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>The dimensions of at least one arm of the angle is greater than 150</td>
<td>D4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Zinc coating</td>
<td>Galvanised</td>
<td>Y</td>
<td>Mandatory</td>
<td>Mandatory</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Non-galvanised</td>
<td>N</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Length (in millimetres)</td>
<td>Less than or equal to 900</td>
<td>1</td>
<td>Mandatory</td>
<td>Optional</td>
<td>Yes</td>
</tr>
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<td></td>
<td></td>
<td>Greater than 900 but less than or equal to 2500</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Description</td>
<td>MCC</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>-------------------------------------------------</td>
<td>------</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Greater than 2500 but less than or equal to 4000</td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>Greater than 4000</td>
<td>4</td>
<td></td>
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</tbody>
</table>

As an example of prime non-alloyed galvanised solid base angle of dimension 100mm x 100mm x 6mm of length 2.5 metres would receive a MCC of PBD2Y2.

The MCCs will be used to model match export models to the identical or comparable domestic models. In addition, the MCCs will be used to determine the profitability of domestic sales in the ordinary course of trade test by comparing domestic selling prices to the corresponding cost to make and sell. The MCC may also be used to compare the export price to the cost to make the exported model as part of the constructed normal value.

If there are models manufactured and sold by your company that do not align within the MCC structure above, this should be raised by lodging a submission with the Commission as soon as is practicable, but no later than the time this questionnaire is due (4 April 2019), otherwise the response may be deemed deficient.
SECTION A
COMPANY INFORMATION

A-1 Company representative and location
1. Please nominate a contact person within your company:

Below is this case’s exporter contact information:
Company Name: Yongkang Vincent Import and Export Co., Ltd. (hereinafter referred to as “Vincent” or “the company”)
Address: Second Floor, 103 East Road, Dongcheng Street, Yongkang City, Zhejiang Province
Contact person: [              ]
Position in the company: [              ]
Telephone: [              ]
E-mail address: [              ]

Below is this case’s related producer contact information:
Company Name: Jinhua Hongtuo Metal Product Co., Ltd. (hereinafter referred to as “Hongtuo” or “the company”)
Address: No. 3 Yajin Road, Jiangdong Industrial Park, Jindong District, Jinhua City, Zhejiang Province
Contact person: [              ]
Position in the company: [              ]
Telephone: [              ]
E-mail address: [              ]

2. If you have appointed a representative, provide their contact details:

Name: [              ]
Address: [              ]
Telephone: [              ]
E-mail address: [              ]

A duly signed copy of the power of attorney has already been submitted to the Commission via email.

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

3. Please provide the location of where the company’s financial records are held.

Answer:

Vincent and Hongtuo’s financial records are held at question A-1 address.

4. Please provide the location of where the company’s production records are held.

Answer:

Vincent is a trading company, all the goods under consideration were produced by related company Hongtuo, Hongtuo’s production address refer to question A-1.

A-2 Company information
1. What is the legal name of your business?

Answer:

Yongkang Vincent Import and Export Co., Ltd. (hereinafter referred to as “Vincent”). is an exporter of subject goods.
1. Jinhua Hongtuo Metal Product Co., Ltd. (hereinafter referred to as “Hongtuo” or “the company”) is a related producer of subject goods.

2. Does your company trade under a different name and/or brand? If yes, provide details.
   
   **Answer:**
   
   Vincent and Hongtuo did not trade subject under consideration under a different name or brand.

3. Was your company ever known by a different legal and/or trading name? If yes, provide details
   
   **Answer:**
   
   In July 2016, Vincent changed company name from “Yongkang Vincent Tool Co., Ltd.” to “Yongkang Vincent Import and Export Co., Ltd.”.
   
   For Hongtuo, Jinhua Hongtuo Metal Product Co., Ltd. is the only known legal name.

4. Provide a list of your current board of directors and any changes in the last two years.
   
   **Answer:**
   
   In Vincent, there is [ ], and there was no change in the last two years.
   
   In Hongtuo, there is [ ], and there was no change in the last two years.

5. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint-ventures)? If yes, provide:
   (a) A diagram showing the complete ownership structure; and
   (b) A list of all related companies and its functions
   
   **Answer:**
   
   Vincent and Hongtuo are private company, and not a part of group.

6. Is your company or parent company publically listed? If yes, please provide:
   (a) The stock exchange where it is listed; and
   (b) Any principle shareholders
   
   If no, please provide:
   (a) A list of all principal shareholders and the shareholding percentages.
   
   **Answer:**
   
   Vincent is not a listed company, and Vincent’s [ ].

   **Below is Hongtuo’s shareholder list:**

<table>
<thead>
<tr>
<th>No</th>
<th>Shareholder’s name</th>
<th>Percentage</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>[ ]</td>
<td>[ ]</td>
<td>Natural person</td>
</tr>
<tr>
<td>2</td>
<td>[ ]</td>
<td>[ ]</td>
<td>Natural person</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>100%</td>
<td></td>
</tr>
</tbody>
</table>

   1 Principal shareholders are those who are able to cast, or control the casting of, 5% or more of the maximum amount of votes that could be cast at a general meeting of your company.
7. What is the overall nature of your company’s business? Include details of the products that your company manufacture and sell and the market your company sells into.

Answer:

Vincent is a trading company, “import and export business of goods and technology” is Vincent’s business scope. During the investigation period, Vincent export the products all to [ ], including [ ]

Hongtuo is a producer, “Metal structure, stainless steel products, construction metal parts manufacturing, sales (except dangerous goods and metal surface treatment and other contaminated processes), national laws and regulations permit the import and export of goods and technology without pre-approval. The design, production (manufacture), installation, transformation and repair of special equipment for the production and manufacture of important industrial products, and the production and manufacture of important industrial products” is Hongtuo’s business scope. During the investigation period, Hongtuo produced [ ].

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:
   (a) produce or manufacture;
   (b) sell in the domestic market;
   (c) export to Australia; and
   (d) export to countries other than Australia.

Answer:

Vincent is subject products exporter; all the subject products was produced by related company Hongtuo. For Hongtuo and Vincent’s address, please refer to question A-1.

There is no domestic and export to countries other than Australia in Vincent and Hongtuo.

9. Provide your company’s internal organisation chart.

Answer:

Please refer to Exhibit A-2.9 Internal organisation chart.

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

Answer:

Please refer to Exhibit A-2.9 Internal organisation chart.

11. Does your company produce brochures, pamphlets or other promotional material? If yes, please provide them.

Answer:

There is no produce brochures, pamphlets or other promotional material in Vincent and Hongtuo.

A-3 General accounting information

1. What is your financial accounting period?

Answer:

The accounting period is from 1st January to 31st December.

2. Are your financial accounts audited? If yes, who is the auditor?
Answer:

Vincent and Hongtuo’s financial accounts is not audited.

3. What currency are your accounts kept in?

Answer:

RMB is Vincent and Hongtuo’s accounts currency.

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

Answer:

[ ] is Vincent’s financial accounting system.  
[ ] is Hongtuo’s financial accounting system.

5. What is the name of your sales system?

Answer:

There is no sales system in Vincent and Hongtuo.

6. What is the name of your production system?

Answer:

Not applicable for Vincent, because Vincent is a trading company and no production.  
There is no production system in Hongtuo.

7. If your financial accounting, sales and production systems are different, how do the systems interact? Is it electronically or manual? Please provide a detailed explanation and include diagrams.

Answer:

There is only one financial system in Vincent and Hongtuo, no sales and production system.

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

Answer:

Not applicable. The accounting practices of Vincent and Hongtuo are in accordance with the PRC GAAP.

9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.

Answer:

Not applicable, Vincent and Hongtuo did not change accounting practices and/or policies over the last two years.

A-4 Financial Documents

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

Answer:
Please refer to Exhibit A-4.1 Financial statements.

2. If the financial statements in A-4.1 are unaudited, provide for each company:
   (a) the tax returns relating to the same period; and
   (b) reconciliation of the revenue, cost of goods sold, and net profit before tax between the financial statements and tax returns.

Answer:

Please refer to Exhibit A-4.1 Financial statements.

3. Does your company maintain different profit centres? If yes, provide profit & loss statements for the profit centre that the goods falls into for:
   (a) the most recent financial year; and
   (b) the period.

Answer:

There are no profit centres in Vincent and Hongtuo.

4. If the period is different to your financial period, please provide:
   (a) Income statements directly from your accounting information system covering the most recent financial period and the period; or
   (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.

Answer:

Not applicable, the period is same as financial period.

5. Please provide a copy of your company’s trial balance (in Excel) covering the period and the most recent financial year.

Answer:

Please refer to Exhibit A-4.5 Trial Balance.

6. Please provide your company’s chart of accounts (in Excel).

Answer:

Please refer to Exhibit A-4.5 Trial Balance, all the accounts are included in trial balance.

If any of the documents are not in English, please provide a complete translation of the documents.
SECTION B
EXPORT SALES TO AUSTRALIA

B-1 Australian export sales process

1. Provide details (and diagrams if appropriate) of the export sales process of your company and any entities (e.g. agents) including:
   (a) Marketing and advertising activities
   (b) Price determination and/or negotiation process
   (c) Order placement process
   (d) Order fulfilment process and lead time
   (e) Delivery terms and process
   (f) Invoicing process
   (g) Payment terms and process

Answer:

Vincent exported subject products to Australia directly, all the subject products was purchased from related company Hongtuo.

Vincent and the customer negotiated price by telephone and real time software, according to customer’s requirement, Vincent quota the price, after rounds of negotiation, the price, deliver term, deliver date, payment term was settled, Australia importer place purchase order to Vincent.

Then Vincent inform Hongtuo to produce Australia importer required products. Hongtuo arrange production and delivery the goods to the port. Then Vincent will issue the commercial invoice and packing list based on the actual shipments, which will be sent to the importers for payment.

2. In what currency do you invoice your Australian customers? If it is not in your local currency:
   (a) Do your customers pay you into a foreign currency denominated account? If yes, provide details;
   (b) Do you use forward contracts to lock in the foreign exchange rate relating to the export sales? If yes, provide details;
   (c) How is the exchange rate determined in your accounting system and how often is it updated?

Answer:

The commercial invoice Vincent issued to Australia importer is USD, not same as Vincent’s local currency.

Vincent’s customer pays commercial invoice into USD denominated account. Vincent not use forward contracts to lock in the foreign exchange rate relating to the export sales. Vincent use each month’s first working day’s currency as accounting system exchange rate and update monthly.

3. Are there any Australian customers related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.

Answer:

No Australian customer related to Vincent.

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

Answer:

No applicable, there is no price list or extras list in Vincent.
5. Do your export selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

**Answer:**

No applicable, there is no selling price in Vincent.

6. Did you provide on-invoice discounts and/or off-invoice rebates to any Australian customer or an associate of the customer in relation to the sale of the goods during the period? If yes, provide a description and explain the terms and conditions that must be met by the customer to obtain the discount.

**Answer:**

No applicable, there is no on-invoice discounts and/or off-invoice rebates to any Australian customer or an associate of the customer in relation to the sale of the goods during the period.

7. Did you issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the goods during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

**Answer:**

No applicable, Vincent did not issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the goods during the period.

8. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:

   (a) What date are you claiming as the date of sale?
   (b) Why does this date best reflect the material terms of sale?

**Answer:**

Vincent use invoice date as the date of sale.

### B-2 Australian sales listing

1. Complete the worksheet named ‘B-2 Australian sales’
   - This worksheet lists all export sales (i.e. transaction by transaction) to Australia of the goods invoiced within the period.
   - If you have claimed in B-1.8 that the date of sale is one other than the invoice date, then add the sales within your claimed date of sale.
   - You must provide this list in electronic format using the template provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.
   - If there are any direct selling expenses incurred in respect of the exports to Australia not listed in the spreadsheet, add a column. For example, if the delivery terms make you responsible for arrival of the goods at an agreed point within Australia (e.g. delivered duty paid), insert additional columns in the spreadsheet for all other costs incurred.

2. Provide a table listing the source of the data for each column in the export sales listing (B-2.1).

**Answer:**

Please refer to Exhibit B-2 Australian sales listing.

### B-3 Sample export documents

1. Select the two largest invoices by value and provide the following documentation:
   - Contracts
   - Purchase order and order confirmation
• Commercial invoice and packing list
• Proof of payment and accounts receivable ledger
• Documents showing bank charges
• Invoices for inland transport
• Invoices for port handling and other export charges
• Bill of lading
• Invoices for ocean freight & marine insurance (if applicable)
• Country of origin certificates (if applicable)

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

2. For each document, please annotate the documents or provide a table reconciling the details in the export listing (in B-2) to the source documents (in B-3.1).

**Answer:**

*Please refer to Exhibit B-3 Sample export documents.*

**B-4 Reconciliation of sales to financial accounts**

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

**Answer:**

*Please refer to Exhibit B-4.1 Upwards sales.*

2. Please provide all documents (e.g. general ledgers, trial balances), other than those in A-5, B-2 and D-2, required to complete the “Upwards sales” worksheet. If the documents include spreadsheets, all formulas used must be retained.

**Answer:**

*Please refer to Exhibit B-4.1 Upwards sales.*

3. For any amount in the “Upwards sales” worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
   - the name of the source document, including the relevant page number, in column F of the worksheet; and
   - highlight or annotate the amount shown in the source document.

**B-5 Reconciliation of direct selling expenses to financial accounts**

1. Please complete the worksheet named “B-5 Upwards selling expense” to demonstrate that the direct selling expenses (e.g. Inland transport) in B-2 and D-2 are complete.
   - You must provide this list in electronic format using the template provided.
   - Please use the currency that your accounts are kept in.
   - If you have used formulas to complete this worksheet, these formulas must be retained.

**Answer:**

*Please refer to Exhibit B-5 Upwards selling expenses.*

2. Please provide all documents (e.g. general ledgers, trial balances), other than those in A-5, B-2 and D-2, required to complete the “Upwards SG&A” worksheet. If the documents include spreadsheets, all formulas used must be retained.
Answer:

Please refer to Exhibit B-5 Upwards selling expenses.

3. For any amount in the “Upwards sales” worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
   • the name of the source document, including the relevant page number, in column F of the worksheet;
   and
   • highlight or annotate the amount shown in the source document.
SECTION C
EXPORTED GOODS & LIKE GOODS

The Commission considers the MCC structure in and of itself is not likely to be commercially sensitive information. Any claim that disclosing the MCC information is confidential or would adversely affect your business or commercial interests must be raised by lodging a submission as soon as practicable, but no later than the time this questionnaire is due.

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

2. Provide a list of MCCs of the goods exported to Australia. This must cover all MCCs listed in the Australian sales listing in B-2.
   - This list must be disclosed in the public record version of the response.

   Answer:

   Vincent all exported to Australia is prime, Galvanised zinc coating, non-alloyed. Exported to Australia specification including [ ], exported to Australia length including [ ].

   The MCCs exported to Australia are PBD2Y1, PBD2Y2, PBD2Y3, PBD3Y2, PBD3Y3.

C-2 Models sold in the domestic market
1. Fully describe all like goods your company sold on the domestic market during the period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the like goods sold on the domestic market.

2. Provide a list of MCCs of like goods sold on the domestic market. This must cover all MCCs listed in the domestic sales listing in D-2.
   - This list must be disclosed in the public record version of the response.

3. If your company did not sell like goods in the domestic market during the period, describe the most similar goods of the same general category that your company sold. Please describe the characteristics of those goods with reference to the MCC.

   Answer:

   Whole C-2 questions are not applicable, because Vincent and Hongtuo did not have domestic sales.

C-3 Internal product codes
1. Does your company use product codes or stock keeping unit (SKU) codes?
   If yes:
   (a) Provide details of the product or SKU coding system for the goods, such as a legend or key of the meaning for each code within the product or SKU code.
   (b) Provide details on how you mapped the product or SKU codes to the MCC for the purpose of completing this questionnaire.
   (c) Provide a table of showing the product or SKU codes for each MCC.

   If no:
   (a) Provide details on the method used to identify the MCC in the sales and cost spreadsheets.

   Answer:

   Not applicable, because there are no product code or stocking keeping unit codes in Vincent and Hongtuo.
SECTION D
DOMESTIC SALES

D-1 Domestic sales process

1. Provide details (and diagrams if appropriate) of the domestic sales process of your company and any other related entities including:
   (a) Marketing and advertising activities
   (b) Price determination and/or negotiation process
   (c) Order placement process
   (d) Order fulfilment process and lead time
   (e) Delivery terms and process
   (f) Invoicing process
   (g) Payment terms and process

   Answer:
   This question is not applicable, because there are no domestic sales in Vincent and Hongtuo.

2. Are any domestic customers related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.

   Answer:
   This question is not applicable, because there are no domestic sales in Vincent and Hongtuo.

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

   Answer:
   This question is not applicable, because there are no domestic sales in Vincent and Hongtuo.

4. Do your domestic selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

   Answer:
   This question is not applicable, because there are no domestic sales in Vincent and Hongtuo.

5. Did you provide on-invoice discounts and/or off-invoice rebates to the customer or an associate of the customer in relation to the sale of the like goods during the period? If yes, provide a description; and explain the terms and conditions that must be met by the importer to obtain the discount.

   Answer:
   This question is not applicable, because there are no domestic sales in Vincent and Hongtuo.

6. Did you issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the like goods during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

   Answer:
   This question is not applicable, because there are no domestic sales in Vincent and Hongtuo.

7. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:
   (a) What date are you claiming as the date of sale?
(b) Why does this date best reflect the material terms of sale?

Answer:

This question is not applicable, because there are no domestic sales in Vincent and Hongtuo.

D-2 Domestic sales listing

1. Complete the worksheet named “D-2 Domestic sales”
   - This worksheet lists all domestic sales (i.e. transaction by transaction) of like goods invoiced within the period, even if they are models not exported to Australia
   - If you have claimed in D-1.7 that the date of sale is one other than the invoice date, then add the sales within your claimed date of sale.
   - You must provide this list in electronic format using the template provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.
   - If there are any other costs, charges or expenses incurred in respect of the sales listed which have not been identified in the table in question D-2 above, add a column for each item. For example, certain other selling expenses incurred.

Answer:

This question is not applicable, because there are no domestic sales in Vincent and Hongtuo.

2. Provide a table listing the source of the data for each column in the domestic sales listing (D-2.1).

Answer:

This question is not applicable, because there are no domestic sales in Vincent and Hongtuo.

D-3 Sample domestic sales documents

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

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

Answer:

This question is not applicable, because there are no domestic sales in Vincent and Hongtuo.

2. For each document, please annotate the documents or provide a table reconciling the details in the domestic sales listing (in D-2) to the source documents (in D-3.1).

Answer:

This question is not applicable, because there are no domestic sales in Vincent and Hongtuo.

D-4 Reconciliation of sales to financial accounts

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

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

2. Please provide all documents (e.g. general ledgers, trial balances), other than those in A-5 and D-2, required to complete the “Upwards sales” worksheet. If the documents include spreadsheets, all formulas used must be retained.

3. For any amount in the “Upwards sales” worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
   • the name of the source document, including the relevant page number, in column F of the worksheet;
   • highlight or annotate the amount shown in the source document.

Answer:

D-4 whole question are not applicable, because Vincent has provided Exhibit B-4 Upwards sales.
SECTION E
DUE ALLOWANCE

E-1 Credit expense
1. Do you provide credit to any domestic customers in relation to sales of like goods (i.e. payment terms that are not on a cash or pre-payment basis)? If yes:
   (a) Do you provide a rolling credit facility to your domestic customers (i.e. no specific payment terms agreed at the time of sale)? If yes:
      i. Calculate the accounts receivable turnover for each domestic customer (credit sales divided by the average accounts receivable).
      ii. Calculate the average credit term for each domestic customer by dividing 365 by the accounts receivable turnover
   (b) Do you have short term borrowings or an overdraft facility? If yes, what is the interest rate, or average of interest rates?
   (c) Do you have term deposits or other cash product (e.g. bonds)? If yes, what is the interest rate, or average of interest rates?

Answer:

There were no domestic sales in Vincent and Hongtuo, so domestic customer credit expense is not applicable for Vincent.

2. Do you provide credit to any Australian customers in relation to sales of the goods (i.e. payment terms that are not on a cash or pre-payment basis)? If yes:
   (a) Do you provide a rolling credit facility to your Australian customers (i.e. no specific payment terms agreed at the time of sale)? If yes:
      i. Calculate the accounts receivable turnover for each domestic customer (credit sales divided by the average accounts receivable).
      ii. Calculate the average credit term for each domestic customer by dividing 365 by the accounts receivable turnover
   (b) If your Australian customers pay you into a foreign currency denominated account (question B-1.2(a) refers):
      i. Do you have short term borrowings or an overdraft facility denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?
      ii. What is the interest rate, or average of interest rates, applying to term deposits or other cash product (e.g. bonds) denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?

Answer:

The payment term for Australia importer is [ ], For credit expenses please refer to Exhibit B-2 Australian sales listing.

Australia importer paid Vincent by USD, there were no same currency short-term borrowings or an overdraft facility in Vincent.

There were no term deposits or other cash product in Vincent.

For the interest rate for calculating credit cost, please refer to Exhibit E-1.2 Interest rate.

E-2 Packaging
1. What is the packaging used for your domestic sales of like goods?

Answer:

Not applicable, because there are no domestic sales in Vincent.

2. What is the packaging used for your export sales of the goods to Australia?
Answer:

[ ] are used for packing, and this packing costs has been included in Hongtuo’s production cost, so there is no packing adjustment in Vincent.

3. If there are distinct differences in packaging between your domestic and export sales:
   (a) Provide details of the differences
   (b) Calculate the weighted average packaging cost for each model sold on the domestic market
   (c) Calculate the weighted average packaging cost for each model exported to Australia

Answer:

Not applicable, because there are no domestic sales in Vincent and Hongtuo.

E-3 Delivery

1. Are any domestic sales of like goods delivered to the customer? If yes, how were the transportation costs calculated in the domestic sales listing in D-2?

Answer:

Not applicable, because there are no domestic sales in Vincent and Hongtuo.

2. What are the delivery terms of the export sales of the goods to Australia?

Answer:

All exported to Australia delivery term is [ ]

3. If the delivery terms of the Australian sales includes delivery to the port, how were the inland transport and port charges calculated in the Australian sales listing in B-2?

Answer:

Inland transport and port charges are paid in related producer company Hongtuo. Vincent and Hongtuo report inland freight and handling charge by each commercial invoice actual expenses.

4. If the delivery terms of the Australian sales includes ocean freight, how was the ocean freight cost calculated in the Australian sales listing in B-2?

Answer:

Not applicable, exported to Australia delivery term is FOB, ocean freight is paid by Australia importer.

5. If the delivery terms of the Australian sales includes marine insurance, how was the marine insurance calculated in the Australian sales listing in B-2?

Answer:

Not applicable, exported to Australia delivery term is FOB, marine insurance is paid by Australia importer.

6. If the delivery terms of the Australian sales includes delivered duty paid, how were the Australian importation and delivery costs calculated in the Australian sales listing in B-2?

Answer:

Not applicable, exported to Australia delivery term is FOB, delivered duty paid is paid by Australia importer.
E-4   Other direct selling expenses
1. Do you provide sales commissions for domestic sales of like goods and/or export sales of the goods? If yes, provide details.

   Answer:

   Not applicable, there are no sales commissions in Vincent.

2. Are there any differences in tax liability between domestic and export sales? If yes, provide details, for example:
   • What is the rate of value-added tax (VAT) on sales of the goods and like goods?
   • How is VAT accounted for in your records in relation to sales of the goods and like goods?
   • Do you receive a VAT refund in relation to sales of the goods and/or like goods?
   • Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?

   Answer:

   There were no domestic sales in Vincent and Hongtuo.

   VAT rate changed from 17% to 16% after May 1, 2018, so the purchasing VAT rate before May 1, 2018 is 17%, purchasing VAT rate after May 1, 2018 is 16%.

   Vincent exported to Australia receive VAT refund, before September 14, 2018, VAT refund rate is 9%, after September 15, 2018, VAT refund rate is 13%.

   For the VAT not refund amount, please refer to Exhibit B-2 Australian sales listing.

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

   Answer:

   Not applicable, there are no domestic sales in Vincent and Hongtuo.

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

   Answer:

   Not applicable, exported to Australia delivery term is FOB, inland transport and port charges were paid in related producer company Hongtuo.

E-5   Other adjustment claims
1. Are there any other adjustments required to ensure a fair comparison between the export price and the normal value (based on domestic sales, costs and/or third country sales)? If yes, provide details.
   • An adjustment will only be made where there is evidence that the difference affects price comparability.
   • Refer to Chapter 14 of the Dumping and Subsidy Manual for more information.

   Answer:

   Not applicable, all the adjustment expenses have been included in question E-1, E-3, and reported in B-2.
SECTION F
THIRD COUNTRY SALES

F-1 Third country sales process
1. Are your sales processes to any third country (i.e. exports to countries other than Australia) different to the sales process described in B-1.1? If yes, provide details of the differences.

Answer:
This question is not applicable, because there are no third country sales in Vincent and Hongtuo.

2. Are there any third country customers related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.

Answer:
This question is not applicable, because there are no third country sales in Vincent and Hongtuo.

3. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:
   (a) What date are you claiming as the date of sale?
   (b) Why does this date best reflects the material terms of sale?

Answer:
This question is not applicable, because there are no third country sales in Vincent and Hongtuo.

F-2 Third country sales listing
1. Complete the worksheet named “F-2 Third country sales”
   - This worksheet lists all export sales, summarised by country and customer, to third countries of like goods invoiced within the period.
   - If you have claimed in F-1.3 that the date of sale is one other than the invoice date, then add sales with your claimed date of sale.
   - You must provide this list in electronic format using the template provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.

Answer:
This question is not applicable, because there are no third country sales in Vincent and Hongtuo.

2. Provide a table listing the source of the data for each column in the export sales listing (F-2.1).

Answer:
This question is not applicable, because there are no third country sales in Vincent and Hongtuo.

F-3 Differences in sales to third countries
1. Are there any differences in sales to third countries which may affect their comparison to export sales to Australia? If yes, provide details.

Answer:
This question is not applicable, because there are no third country sales in Vincent and Hongtuo.
SECTION G
COST TO MAKE AND SELL

G-1. Production process
1. Describe the production process for the goods and provide a flowchart of the process. Include details of all products manufactured using the same production facilities as those used for the goods. Also specify all scrap or by-products that result from producing the goods.

Answer:

Please refer to Exhibit G-1.1 Production process.

2. Are any of your suppliers related to your company (regardless of whether it is relevant to the manufacture of the goods)? If yes, please provide details including the product or services supplied by the related company.

Answer:

There is no any related supplier related to Hongtuo.

G-2. Cost accounting practices
1. Is your company’s cost accounting system based on actual or standard costs (budgeted)?

Answer:

Hongtuo’s cost accounting system based on actual.

2. If you company uses standard costs:
   (a) Were standard costs used as the basis of actual costs in your responses G-3.1 & G-5.1?
   (b) Have all variances (i.e. differences between standard and actual production costs) been allocated to the goods?
   (c) How were those variances allocated?
   (d) Provide details of any significant or unusual cost variances that occurred during the period.

Answer:

Not applicable, because Hongtuo doesn’t use standard cost.

3. Do you have different cost centres in your company’s cost accounting system? If yes, list the cost centres, provide a description of each cost centre and the allocation methodology used in your accounting system.

Answer:

Hongtuo doesn’t have use cost canter in costing accounting system.

4. To what level of product specificity (models, grades etc.) does your company’s cost accounting system normally record production costs?

Answer:

Not applicable, there is no production system in Hongtuo.

5. Are there any costs for management accounting purposes valued differently to financial accounting purposes? If yes, provide details of the differences.

Answer:
There are no any costs difference for management accounting purposes valued differently to financial accounting purposes.

6. Has your company engaged in any start-up operations in relation to the goods? If yes:
   (a) Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.
   (b) State the total cost of the start-up operation and the way that your company has treated the costs of the start-up operation in its accounting records.

Answer:

Hongtuo doesn’t engage in any start-up operations in relation to the goods.

7. What is the method of valuation for raw material, work-in-process, and finished goods inventories (e.g. last in first out –LIFO, first in first out- FIFO, weighted average)?

Answer:

[ ] is used for raw material, work-in-process, and finished goods inventories valuation.

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

Answer:

There are no damaged or sub-standard goods generated at the various stages of production valuation in Hongtuo.

9. What are the valuation methods for scrap, by products, or joint products?

Answer:

There is no scrap, by products, or joint products valuation in Hongtuo.

10. Are any management fees/corporate allocations charged to your company by your parent or related company? If yes, provide details

Answer:

There are no any management fees/corporate allocations charged to the company by the company parent or related company.

G-3 Cost to make on domestic market

1. Complete the worksheet named "G-3 Domestic CTM".
   • This worksheet lists the quarterly cost to make the domestic models of like goods by MCC manufactured within the period, even if they are models not exported to Australia.
   • The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
   • If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture like goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as ‘other costs’ if not already included, for example, under material costs.
   • You must provide this list in electronic format using the template provided.
   • If you have used formulas to complete this worksheet, these formulas must be retained.
   • If you have claimed in D-1.7 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all domestic sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.

Answer:
This question is not applicable, because there were no domestic sales in Vincent and Hongtuo.

2. Provide a table listing the source of the data for each column of the “Domestic CTM” listing (G-3.1).

Answer:

This question is not applicable, because there were no domestic sales in Vincent and Hongtuo.

G-4  Selling, General & Administration expenses

1. Complete the worksheet named "G-4.1 SG&A listing”.
   - This worksheet lists all selling, general and administration expenses by account code for the most recent accounting period and the period.
   - You must provide this list in electronic format using the template provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.

Answer:

Please refer to Exhibit G-4.1 SG&A listing.

2. Complete the worksheet named "G-4.2 Domestic SG&A calculation”.
   - This worksheet calculates the unit domestic SG&A for each MCC.
   - You must provide this list in electronic format using the template provided.
   - Please use the formulas provided.

Answer:

Not applicable, because there are no domestic sales in Vincent.

G-5  Cost to make the goods exported to Australia

1. Complete the worksheet named "Australian CTM".
   - This worksheet lists the quarterly cost to make the Australian models of the goods under consideration by MCC manufactured within the period.
   - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
   - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as ‘other costs’ if not already included, for example, under material costs.
   - You must provide this list in electronic format using the template provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.
   - If you have claimed in B-1.8 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all Australian sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.

Answer:

Please refer to Exhibit G-5 Australian CTMS.

2. Provide a table listing the source of the data for each column of the “Australian CTM” listing (G-5.1).

Answer:

Please refer to Exhibit G-5 Australian CTMS.

G-6  Cost allocation methodology

1. What is the allocation methodology used to complete in G-3 domestic CTM and G-5 Australian CTM for:
   (a) Raw materials
(b) Labour
(c) Manufacturing overheads

Answer:

Hongtuo allocated raw material, labour and manufacturing overheads by [ ].

2. Select the domestic model (export model if you have no domestic production of like goods) with the largest production volume over the period and provide worksheets demonstrating the allocation methodology described in G-6.1 from your normal cost accounting system to the cost for that model reported in G-3.1.

Answer:

This question is not applicable, because there were no domestic sales in Vincent and Hongtuo.

G-7 Major raw material costs
1. What are the major raw materials used in the manufacture of the goods?

Answer:

[ ] is the major materials used in the manufacture of the goods.

2. Are any raw materials sourced as part of an integrated production process from a subsidiary company which your company exercise control? If yes, complete the worksheet named “G-7.2 Raw material CTM” for these raw materials.
   • This worksheet lists the quarterly cost to make the raw material manufactured within the period.
   • The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold).
   • If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the raw material, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as ‘other costs’ if not already included, for example, under material costs.
   • You must provide this list in electronic format using the template provided.
   • If you have used formulas to complete this worksheet, these formulas must be retained.

Answer:

There are no raw materials sourced as part of an integrated production process from a subsidiary company.

3. Using the domestic cost data in G-3, calculate the weighted average percentage of each raw material cost (listed in G-7.1) as a proportion of total cost to make.

Answer:

This question is not applicable, because there were no domestic sales in Vincent and Hongtuo.

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

Answer:

Please refer to Exhibit G-7.4 Raw material purchases.

5. Provide a table listing the source of the data for each column of the “Raw material purchases” listing (G-7.4).
Answer:

Please refer to Exhibit G-7.4 Raw material purchases.

6. For each raw material:
   (a) Select the two largest invoices by value and provide the commercial invoice and proof of payment.
   (b) Reconcile the total value listed of the purchases in G-7.4 to relevant purchase ledgers or trial balances in your accounting system. Provide copies of all documents used to demonstrate the reconciliation.

Answer:

Please refer to Exhibit G-7.4 Raw material purchases.

7. Are any of the suppliers listed in G-7.4 related to your company? If yes, please provide details on how the price is set.

Answer:

There is no any supplier listed in G-7.4 related to the company.

G-8 Reconciliation of cost to make to audited financial statements

1. Please complete the worksheet named “Upwards costs”.
   • You must provide this list in electronic format using the template provided.
   • Please use the currency that your accounts are kept in.
   • If you have used formulas to complete this worksheet, these formulas must be retained.

2. Please provide any documents, other than those in A-5, G-3 and G-5, required to complete the “Upwards costs” worksheet.
   H-2.2

3. For any amount that is hard coded (i.e. not a formula), please cross-reference by providing:
   • the name of the source document, including the relevant page number, in column F of the worksheet;
     and
   • highlight or annotate the amount shown in the source document.

Answer:

Please refer to Exhibit G-8 Upwards costs

G-9 Capacity Utilisation

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

Answer:

Please refer to Exhibit G-9 Capacity Utilisation.
SECTION H
PARTICULAR MARKET SITUATION

H-1 Reporting requirements
1. Describe generally all interaction that your business has with the Government of China at all levels, including (but not limited to):
   (a) reporting requirements;
   (b) payment of taxes;
   (c) senior management representation within your business;
   (d) supervision by the State-owned Assets Supervision and Administration Commission (SASAC) or a body under the control of SASAC.
   (e) approval/negotiation of business decisions (e.g. investment decisions, management decisions, pricing decisions, production decisions, sales decisions);
   (f) licensing;
   (g) restrictions on land use;
   (h) provision of loans; or
   (i) provision of grants, awards or other funds.

Answer:

The company will file the following documents to the related government:

Administration of Industry and Commerce of Jinhua and Yongkang City: annual financial report and business license any review;
Tax Bureau of Zhejiang City: Tax returns; Monthly.

H-2 Business structure, ownership and management
1. Indicate whether your company is a state-owned or state-invested enterprise (SIE)
   • A state owned enterprise refers to any company or enterprise that is wholly or partially owned by the GOC (either through direct ownership or through association).

Answer:

Vincent and Hongtuo is a private limited company, not a state-owned or state-invested enterprise.

2. List the Board of Directors and Board of Shareholders of your business and all other entities/businesses your business is related to.

Answer:

For the shareholders and directors, please refer to question A-2.4 and A-2.6.

3. Indicate the names of common directors and officers between your business and related businesses, where applicable.

Answer:

[ ]

4. Are any members of your business’ (and/or all other entities your business is related to) Board of Directors or Board of Shareholders representatives, employees, or otherwise affiliated with the Government of China (at any level, from any agency, party, or otherwise associated entity, including SASAC)? If yes, identify the individuals, their role on that Board and their affiliation with the Government of China.

Answer:
There is no directors or shareholders representatives, employees, or otherwise affiliated with the Government of China.

5. Does your business’ (and/or all other entities your business is related to) Board of Directors or Board of Shareholders have a representative from the Chinese Communist Party (CCP)? If yes, identify their name and title and indicate their position at the board level.

Answer:

There is no directors or shareholders have a representative from the Chinese Communist Party (CCP).

6. Are any members of your business’ (and/or all other entities your business is related to) Board of Directors or Board of Shareholders appointed, managed or recommended by the Government of China? If yes, identify any relevant government department(s) they are affiliated with.

Answer:

There is no directors or shareholders appointed, managed or recommended by the Government of China.

7. Indicate who owns what percentage of all shares in your business and identify whether they are:
   • an affiliate, representative, agency or otherwise representative of the Government of China;
   • employees of your business;
   • foreign investors; or
   • other (please specify).

8. Provide the details of any significant changes in the ownership structure of your business during the period.

Answer:

There are no changes in the ownership structure of Vincent and Hongtuo during the period.

9. Identify any positions within your business that are appointments or designated to act on behalf of Government of China authorities.

Answer:

There is no any position within Vincent and Hongtuo’s business that are appointments or designated to act on behalf of Government of China.

10. Explain whether there are requirements in law and in practice to have government representation at any level of your business. If there is such a requirement, explain the role of government representatives appointed to any level of your business.

Answer:

There is no requirement in law and in practice to have government representation at any level of Vincent and Hongtuo’s business.

11. If your business is a publicly-traded company, what are the rules regarding the issuance of shares by your business? Identify any stock exchanges on which your business is listed.

Answer:

Vincent and Hongtuo are not a publicly-traded company.

12. Provide the monthly trading volume and average monthly trading price of your listed security over the period.

Answer:
Not applicable, because Vincent and Hongtuo are not listed company.

13. Who has the ability to reward, fire or discipline your business’ senior managers?

Answer:

[ ] has the ability or reward, fore or discipline Vincent’s business senior managers.

14. Do any of your company’s senior managers hold positions in any Government of China departments or organisations, associations or Chambers of Commerce? If yes, describe the nature of these positions.

Answer:

There is no any senior manager hold positions in any Government of China departments or organisations, associations or Chambers of Commerce.

15. Provide the names and positions of your company’s pricing committee.

Answer:

Not applicable, there is no pricing committee in the company.

H-3 Licensing

1. Provide a copy of your business license(s).

Answer:

Please refer to Exhibit H-3.1 Business license.

2. Identify the Government of China departments or offices responsible for issuing the license(s).

Answer:

Please refer to Exhibit H-3.1 Business license.

3. Describe the procedures involved in applying for the license(s).

Answer:

The business license application process is as follows:

<table>
<thead>
<tr>
<th>SN</th>
<th>Examination &amp; Approval Procedure</th>
<th>Required Information</th>
</tr>
</thead>
</table>
| 1  | Name verification                 | 1. Application for name verification  
2. Copy of shareholder's ID card. For legal shares, copy of business license is required. |
| 2  | Office lease                      | 1. Office Lease Agreement |
| 3  | Open an account for capital verification | 1. Copy of notice of enterprise name verification  
2. Copy of shareholder's ID card  
3. Personal chop of shareholder  
4. Bank confirmation |
| 4  | Verification of capital contributions | 1. Copy of notice of enterprise name verification  
2. Copy of articles of incorporation  
3. Copy of shareholder's ID card  
4. Bank confirmation  
4. Describe any requirements or conditions that must be met in order to obtain the license(s).

**Answer:**

The company has to have the company name and operating place.

5. Describe and explain any restrictions imposed on your business by the business license(s).

**Answer:**

The company imposes on business based on the business license's business scope.

6. Describe any sanctions imposed on your business if you act outside the scope of your business license(s).

**Answer:**

If any of the items as stated in the business license is changed, the company shall modify the registration, and the company registration authority shall replace the old business license by a new one.

The company's business scope shall be defined in its articles of association and shall be registered according to law. The company may change its business scope by modifying its articles of association but shall go through the formalities for modifying the registration. If the business scope of a company covers any item subject to approval pursuant to laws or administrative regulations, the approval shall be obtained according to law.

7. Describe and explain any rights or benefits conferred to your business under the license(s).

**Answer:**

The business license is only for registration purpose. No benefits or rights conferred to the business license.

8. Describe the circumstances under which your business license(s) can be revoked, and who has the authority to revoke the license(s).

**Answer:**

Pursuant to relevant provisions of Company Law and the Regulations of the People’s Republic of China on Administration of Company Registration, the business license will be withdrawn under any of the following circumstances:

1. A company which, when registering, falsely reports its registered capital and has obtained registration of company shall be ordered to remedy the situation and fined at least five per cent and no more than fifteen per cent of the amount of the registered capital falsely reported by the company registration authority. If the case is serious, the company’s registration shall be cancelled and the business license withdrawn.
Ⅱ. A company which, when registering, presents false documents or employs other deceptions and has obtained registration of company shall be ordered to remedy the situation and fined by the company registration authority. If the case is serious, the company’s registration shall be cancelled and the business license withdrawn.

Ⅲ. A company which, without justification, fails to commence business more than six months after establishment or ceases to do business for more than six consecutive months after-commencing business shall have its business license cancelled by the company registration authority.

Ⅳ. Where the organ in charge of company registration decides to alter, write off the registration or revoke its decision on alteration registration; where the relevant company refuses to submit or fails to submit its Business License, the organ in charge of company registration shall announce to cancel the company’s business license.

Ⅴ. If a company fails to go through the prescribed procedures for registering changes, the company registration organ shall order it to go through the procedures within a prescribed limit of time. If it has failed to do so within the prescribed time limit, a fine of anywhere from more than RMB 10,000 to less than RMB 100,000 shall be imposed. In case that the business scope to be changed is subject to the approval according to laws, administrative regulations and other orders of the State Council, but the company conducts the operation without such approvals, if the case is serious, its business license shall be revoked.

Ⅵ. If a company refuses annual inspections according to regulations, the company registration organ shall impose a fine of anywhere from more than RMB 10,000 to less RMB 100,000 and order it to accept annual checking within the prescribed time limit, its business license shall be revoked. If a company is found to have concealed facts in its annual checking or resorted to deception, the company registration organ shall impose a fine of anywhere from more than RMB 10,000 to less than RMB 100,000 and order it to correct within the prescribed time limit. If the case is very serious, its business license shall be revoked.

Ⅶ. If a company is found to have forged, altered, rented out, lent or transferred its business license, the company registration organ shall impose a fine of anywhere from more than RMB 10,000 to less RMB 100,000. If the case is very serious, its business license shall be revoked.

Ⅷ. Where any company takes advantage of its name to engage in any serious illegal act that the state security or social public interest, its business license shall be revoked.

H-4 Decision-making, planning and reporting

1. Provide a description of your business’ decision-making structure in general and in respect of the goods. This should identify the persons or bodies primarily responsible for deciding:
   a. what goods are produced;
   b. how the goods are produced;
   c. how levels of inputs such as raw materials, labour and energy are set and secured;
   d. how the use of your outputs, such as product mix, is determined; and
   e. how your business’ profit is distributed.

Answer:

The shareholders have the authority to:

(1) Knowing and understand the important right operating condition;
(2) Served as executive director or supervisor;
(3) Acquisition and transfer of equity according to the law, regulation and article of association.
(4) Selecting operation management team;
(5) Obtaining the remaining property of the company after the termination of the company according to the law;
(6) Has the right to copy the article of association, review executive director, supervisor’s performance of duties and financial statements.

The executive directors has the authority to:

(1) Implementation of the resolution of shareholders;
(2) Determine the business plan and investment plan of the company;
(3) Formulate the annual financial budget and final accounts of the company;
(4) Formulate the company’s profit distribution scheme and to make up for the losses;
(5) Formulate the company’s plans to increase or reduce the registered capital, issue bonds or other securities and listed companies;
(6) Draw up a plan for a company to buy or buy shares of the company or to merge, separate, dissolve and change the form of the company;
(7) Decide the establishment of the internal management organization of the company;
(8) Appoint or dismiss the general manager of the company and the Secretary of the board of directors. Appointment or dismissal of senior managers, such as deputy general manager, financial officer, and other senior managers, on the basis of the nomination of the general manager, and deciding on the matters of reward and rewards and punishments;
(9) Formulate the basic management system of the company;

2. Provide a description of any Government of China input into the decision-making process respecting your manufacture, marketing and sale of the goods.

Answer:

There are no any GOC input/guidance into the decision-making process regarding your manufacturing, marketing and sale of steel products.

3. Provide a list of all government departments/offices that are involved, either directly or indirectly, in your manufacture, sale or purchase of the goods.

Answer:

There are no any GOV government departments/offices that are involved, either directly or indirectly, in your manufacture, sale or purchase of the goods.

4. List and describe all reports that must be submitted to the Government of China periodically by your company and identify the government department/office where each report is filed.

Answer:

Vincent will file the following documents to the related government:

Administration of Industry and Commerce of Jinhua and Yongkang City: annual financial report and business license any review;
Tax Bureau of Zhejiang City: Tax returns; Monthly.

5. Provide a copy of the last two Provincial/City Five Year Plans (including the appendices) for the province/city in which your business is located, whichever is applicable. The copies should be fully translated including the appendices, along with the original Chinese version.

Answer:
Not applicable, there were no last two Provincial/City Five Year plans for the province/city in which the company business is located.

6. Does your business develop any five-year plans or similar planning documents? If yes, provide copies of these plans and advise whether these plans have been submitted, reviewed or approved by the Government of China (including the National Development and Reform Commission).

Answer:

Not applicable, the company doesn’t develop any five-year plans or similar planning documents.

7. Provide copies of the minutes of your Board of Directors and Board of Shareholders meetings over the period.

Answer:

There is no minutes of Board of Directors and Board of Shareholders meetings over the period.

8. Provide copies of the notes to company meetings where pricing decisions on the goods under consideration have been made over the period.

Answer:

Not applicable, goods under consideration pricing is not decisioned by meeting.

H-5 Financial and investment activities

1. Is your business debt funded? If yes, provide a list of all major lenders.

Answer:

Not applicable, there was no business debt funded.

2. What is the rate of interest paid by your business on all debt instruments over the last 5 years?

Answer:

Not applicable, there was no business debt funded.

3. Has your business benefited from any concessional interest rates for your loans/debts in the last 5 years? If yes, provide details.

Answer:

Not applicable, there was no business debt funded.

4. Has your business raised any capital using issuance of shares, preferential shares, rights issue, bonds, warrants, debentures, sub-ordinate loans or any other debt and/or equity instruments in the last 5 years? If yes:
   a. explain what instruments were used;
   b. identify the type (e.g government guarantee) and provider of the security; and
   c. explain the reasons for raising the capital.

Answer:

The company did not raise any capital using issuance of shares, preferential shares, rights issue, bonds, warrants, debentures, sub-ordinate loans or any other debt and/or equity instruments in the last 5 years.

5. Does your business have policies on how cash reserves are to be invested? If yes, provide details.
Answer:

Not applicable, the company doesn’t have policies on how cash reserves are to be invested.

6. Has your business invested in either government or non-government debt securities (such as bonds, quasi-government bonds)? If yes, provide details (e.g. type of instrument, amount invested and the expected rate of return).

Answer:

The company did not invest in either government or non-government debt securities.

H-6 Government policy on the industry

1. Are there any Government of China opinions, directives, decrees, promulgations, measures, etc. concerning industry of the goods that were put in place or operating during the period? If yes, please provide:
   a. copy of the documentation and a translation in English;
   b. documentation concerning the Government of China or any association of the Government of China’s notification of the measures concerning the goods to your company during the period.

Answer:

There are no Government of China opinions, directives, decrees, promulgations, measures, etc. concerning industry of the goods that were put in place or operating during the period.

2. Provide information concerning the name of any Government of China departments, bureaus or agencies responsible for the administration of all Government of China measures concerning the industry of the goods in the regions, provinces or special economic zones where your company is located, including contact information regarding the following areas:
   • industrial policy and guidance on the industry;
   • market entry criteria for the industry;
   • environmental enforcement for the industry;
   • management of land utilization;
   • the China Banking Regulatory Commission for the industry;
   • investigation and inspection of expansion facilities;
   • the section in the National Development and Reform Commission that is responsible for the industry; and
   • import licensing for raw materials relating to the goods under consideration.

Answer:

The major departments that are involved in the abovementioned activities are as following:

Department: Jinhua Municipal Commission of Development & Reform
Address: No. 801 Shuanglong South Street, Jinhua, Zhejiang.
Phone number: 86-0579-82468976

Department: Yongkang State Administration of Taxation
Address: No. 99 Jinshui Road, Yongkang, Zhejiang
Phone number: 86-0579-87172832

Department: Jinhua Local Taxation Bureau
Address: No. 15 Yongfu Road, Jinhua, Zhejiang
Phone number: 86-0579-7171666

Department: Yongkang Administration of Industry and Commerce
Address: 398 Longchuan Zhonglu, Yongkang, Zhejiang
Phone number: +86-0579-87111767
3. Describe any role your company plays in the development of government’s industrial plans and/or policies at all levels of government. For example, does your company provide information for, or request inclusion in, any plans, policies, or measures?

Answer:

The company doesn’t play any role in the development of government’s industrial plans and/or policies at all levels of government.

4. Does your company provide information relating to assessments of the implementation of the plan, policy or measure?

Answer:

The company doesn’t provide information relating to assessments of the implementation of the plan, policy or measure.

5. Has the Government of China designated your company and/or industry as “pillar,” “encouraged,” “honourable,” or any other designation? If yes, please answer the following questions.
   a. Explain the purpose of these designations, the criteria for receiving any such designation, and the benefits or obligations that arise from each such designation.
   b. Is there any connection between these designations and five-year plans or other industrial and/or economic policies or administrative measures?
   c. Describe any instances in which your company cited Government of China plans, policies, or measures as support for receiving the financing that you report.

Answer:

The Government of China did not designate the company and/or industry as “pillar,” “encouraged,” “honourable,” or any other designation.

H-7 Taxation
1. Were there any export taxes on the exports of the goods during the period?

Answer:

There were no any export taxes on the exports of the goods during the period.

2. What was the value-added tax rebate applicable to exports of the goods during the period?

Answer:

Before September 14, 2018, VAT refund rate is 9%, after September 15, 2018, VAT refund rate is 13%.

3. Have there been any changes to the value-added tax rebate applicable to exports of the goods in the last 5 years? If yes, provide:
   a. a detailed chronological history of the value-added tax rebate rates;
   b. products affected;
   c. the effective dates of the rate changes;
   d. fully translated copies of any Government of China notices regarding these changes, including the relevant appendices.
Answer:

In the past five years, VAT refund rate changed once, before September 14, 2018, VAT refund rate is 9%, after September 15, 2018, VAT refund rate is 13%.

Government of China notices regarding these changes, please refer to Exhibit H-7.3 VAT refund rate change notice.

4. Are you aware of any tax changes being planned that would impact the industry?

Answer:

The company not aware any tax changes being planned that would impact the industry.

H-8 Sales Terms
1. Identify the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by your business.

Answer:

Executive director authorises the sales terms, prices and other contract provisions for the sale of the goods by the company.

2. Explain how the selling prices of the goods under consideration by your business are determined, including any Government of China involvement in your business’ pricing decisions, and indicate if the goods are subject to Government of China direct or indirect pricing or government guidance pricing.

Answer:

The company determined the product price based on marketing situation.

There was no any Government of China involvement in the company’s pricing decisions, and the goods are not subject to Government of China direct or indirect pricing or government guidance pricing.

3. Does your business coordinate the selling prices or supply of the goods with other domestic producers or any Government of China departments? If yes, provide details.

Answer:

The company doesn’t coordinate the selling prices or supply of the goods with other domestic producers or any Government of China departments.

4. Explain whether your business provides information or data to the Government of China, other government officials or commercial/industry organisations, including those outside of China, which report on the industry.

Answer:

The company doesn’t provide information or data to the Government of China, other government officials or commercial/industry organisations, including those outside of China, which report on the industry.

5. Explain whether your business provides price data to any other person at the provincial, regional or special economic zone level of government.

Answer:

The company doesn’t provide information or data to the Government of China, other government officials or commercial/industry organisations, including those outside of China, which report on the industry.
H-9 Industry associations
1. Is your business a member of any business or industry associations? If yes, explain your business’ relationship with the association and the involvement of the Government of China with the associations.

Answer:

Vincent and Hongtuo are not a member of any business or industry associations.

2. If your business is a member of an industry association, indicate whether this membership is voluntary or compulsory. Explain the functions that the association provides for your business. Explain in detail the role of the association with respect to the directives as provided by the Government of China concerning the industry.

Answer:

Not applicable, Vincent and Hongtuo are not a member of any business or industry associations.

H-10 Statistics submission/recording
1. Indicate if your business makes submissions to the Chinese Bureau of Statistics and/or any other government organisation. If yes, explain the purpose of these submissions and the type of information submitted.

Answer:

Not applicable, the company doesn’t make submissions to the Chinese Bureau of Statistics and/or any other government organisation.

2. Provide a recent example of a submission that has been made to the Bureau of Statistics and/or any other government organisation. For example, monthly data relating to sales, production and costs.

Answer:

Not applicable, the company doesn’t make submissions to the Chinese Bureau of Statistics and/or any other government organisation.

3. Do the organisations approve or assess your submission? If yes, provide a detailed explanation.

Answer:

Not applicable, the company doesn’t make submissions to the Chinese Bureau of Statistics and/or any other government organisation.

4. Do the organisations provide feedback on your submission? If yes, provide a detailed explanation.

Answer:

Not applicable, the company doesn’t make submissions to the Chinese Bureau of Statistics and/or any other government organisation.

H-11 Regional differences
1. If you have production facilities in more than one region/province, are the laws and regulations in each region the same with respect to pricing? Provide details on any regional differences.

Answer:

The company doesn’t have production facilities in more than one region/province.
H-12 Production/output

1. Is any part of your production subject to any national/regional industrial policy or guidance? If yes, provide details including a background of the policy/guidance and explain any restriction imposed by the policy/guidance. To what extent are any of the policies/guidelines applicable to your business?

Answer:

There is no any part of production subject to any national/regional industrial policy or guidance.

2. Where applicable, how did your business respond to the policies/guidelines?

Answer:

This question is not applicable, there is no any part of production subject to any national/regional industrial policy or guidance.

3. Provide details regarding any other restrictions (e.g., geographic/regional, downstream, use, etc.) to the sale of the goods and/or like goods that may be imposed by the Government of China.

Answer:

There are no restrictions to the sale of the goods and/or like goods that may be imposed by the Government of China.

4. Provide a list of all your domestic customers of the like goods, include the location (city and province) of the customer and indicate whether each customer is an SIE.

Answer:

This question is not applicable, because there are no domestic sales in the company.

5. Are there any restrictions and/or conditions in relation to the quality or quantity of the production of the goods placed upon your business? If yes, provide details.

Answer:

There are no any restrictions and/or conditions in relation to the quality or quantity of the production of the goods placed upon the company business.

6. Does your business require an export licence? If yes, provide details.

Answer:

Please note that Chinese companies do not need to obtain export license after July 1st, 2004, since the new Chinese Foreign Trade Law became effective. A company just needs to file a record of its foreign trade operators to the relevant registration authority. For the Foreign Trade Operators, please refer to Exhibit H-12.6 Record Form of Foreign Trade Operators.

7. Are the goods sold by your business subject to any export restrictions and/or limits during the previous 5 year? If yes, provide details.

Answer:

There are no export restrictions and/or limits during the previous 5 year.

8. Provide details regarding any other restrictions (e.g., geographic/regional, downstream, end use) placed upon your business on the sale of the goods.

Answer:
There are no other restrictions placed on the company’s business on the sale of the goods.

9. Have there been any changes to your production capacity over the last 5 years? If yes, provide details.

Answer:

Production capacity has not been changed over the last 5 years.

10. Does your business benefit from any concession on the purchase of any utility services (e.g. electricity, gas, etc.)? If yes explain the nature and the amount of the concession?

Answer:

The company’s business did not benefit from any concession on the purchase of any utility service.

H-13 Sales price

1. Explain whether your business has been subjected to any direct or indirect price guidance or controls by the Government of China during the period.

Answer:

There is no price guidance or controls by the Government of China.

2. Explain whether your business has been subjected to any direct or indirect price guidance or controls by the Government of China during the period, with respect to raw material inputs.

Answer:

The company did not subject to any direct or indirect price guidance or controls by the Government of China during the period, with respect to raw material inputs.

3. Explain whether your business has encountered any price guidance or controls established by regional, provincial or special economic zone officials and/or organisations.

Answer:

The company’s business has not encountered any price guidance or controls established by regional, provincial or special economic zone officials and/or organisations.

4. Describe in detail how the selling price of the goods is determined. In particular, provide details of any restrictions, limitations, or other considerations imposed on your business.

Answer:

The company determined selling price according the market situation and purchasing cost.

5. Which organisation/business entity do you consider as the price leader of the goods?

Answer:

The company doesn’t consider any organisation/business entity as the price leader of the goods.

6. Does your business have a pricing committee in respect of the goods? If yes, provide the names and positions of all members of the committee.

Answer:

There is no pricing committee in respect of the goods.
7. How often does the pricing committee meet to discuss selling prices of the goods? Provide the minutes or any other relevant documents of all meetings of the pricing committee during the period.

Answer:

Not applicable, because there is no pricing committee in respect of the goods.

8. Identify the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by your business.

Answer:

Executive director authorises the sales terms, prices and other contract provisions for the sale of the goods by your business.

9. If you have production facilities of the goods in more than one region and/or province, are the laws and regulations in each region the same with respect to pricing of the goods? If no, provide details on the differences.

Answer:

The company doesn’t have production facilities of the goods in more than one region and/or province.

**H-14 Adding capacity and/or joint ventures**

1. Provide a detailed explanation with respect to the government approval process on adding capacity and/or joint ventures in relation to your business.

Answer:

This question is not applicable, Vincent and Hongtuo are private company, and Hongtuo did not add capacity.

2. Does the government have the right to request modifications in the terms of adding capacity and/or joint ventures? If yes, provide a detailed explanation.

Answer:

The government doesn’t have the right to request modifications in the terms of adding capacity and/or joint ventures.

**H-15 Raw materials**

1. Are any of the suppliers related or affiliated with you? If yes, provide details.

Answer:

No any raw material supplier related to Hongtuo.

2. Do you purchase from State Invested Enterprises? If yes, provide a details.

Answer:

Hongtuo did not purchase from State Invested Enterprise.

3. If your supplier is based outside China, what import duty rate is applied on the raw materials?

Answer:

Hongtuo's supplier are not based outside China.
4. Is there a price difference in purchase price for raw materials between your suppliers? If yes, provide a detailed explanation.

Answer:

**There is no price difference in purchasing raw materials, all the material purchased based on market.**

5. Describe in detail your business’ purchase procedures of the raw materials, the considerations in selecting a supplier and how the price of the raw materials is determined between you and your suppliers. If it is by tenders, provide details of the criterions/conditions.

Answer:

**Purchasing price is determined based on market situation.**

The company consider in selecting a supplier according the price and the quality of raw materials.

6. If any of your raw materials for the goods and/or like goods are imported by your business, or related businesses:
   a. Provide details including a description of the raw material imported, the supplier and country of origin.
   b. Explain the process required to import the raw materials (e.g. obtaining an import licence, import declarations).
   c. Provide details of any conditions to importing the raw materials (e.g. customs and/or quarantine).
   d. Are you eligible for a duty drawback? If yes, provide details.

Answer:

**The company doesn’t import raw materials for the goods and/or like goods.**

7. Do you, or a business associated with you, sell any of the raw materials used to manufacture the goods and/or like goods, or sell the semi-processed goods?
    a. Please provide a description of the raw material or semi-processed goods which are sold, including whether they are domestic or export transactions, to related or unrelated parties, and how the selling price is determined.
    b. If there is a difference in selling prices between related and unrelated parties, please provide reasons as to why.

Answer:

**The company or a business associated with the company doesn’t sell any of the raw materials used to manufacture the goods and/or like goods, or sell the semi-processed goods.**
EXPORTER'S DECLARATION

I hereby declare that.............................................................(company)
have completed the attached questionnaire and, having made due inquiry, certify that the information
contained in this submission is complete and correct to the best of my knowledge and belief.

Name :......................................................................................

Signature :....................................................................................

Position in

Company  :....................................................................................

Date :.........................................................................................
This glossary is intended to provide you with a basic understanding of technical terms that appear in the questionnaire.

**Adjustments**

To enable a fair comparison between the export price and the normal value Australian legislation provides for the adjustment of the domestic price paid for like goods. Adjustments are made to account for sales occurring at different times, specification differences, and differences in the terms or circumstances of the sales. The adjustment to the normal value may be upward or downward. Areas where you believe an adjustment is necessary should be identified. Section E of the questionnaire refers.

Examples of adjustments that may be made include: *sales occurring at different times* (it is sometimes necessary to compare domestic and export sales made at different times - in these circumstances an adjustment may be made to reflect price movements during that time); *specification differences; packaging; taxes; level of trade; advertising; servicing/warranty; inland freight; warehousing; export charges; credit terms; duty drawback; commissions.*

Adjustments may also be required where the normal value is based on costs to make and sell.

**Arms length**

Sales are not considered to be at “arms length” on your domestic market if there is any consideration payable for the goods other than their price, or there is an association between the buyer and the seller which affects the price, or there will be a reimbursement, compensation or benefit for, or in respect of, the price.

**Constructed value**

In cases where prices paid for like goods sold in the country of export cannot be used for the determination of normal value, i.e. when there are no or insufficient sales or where such sales were not made in the ordinary course of trade, normal value may be based on a constructed value. Constructed value is calculated on the basis of the cost of production of the goods under consideration plus a reasonable amount for selling, general and administration costs, and for profits, that are associated with sales on the domestic market of the country of export.

**Cost of production/manufacturing**

The cost of production or manufacture consists of all manufacturing costs associated with the goods. It is the sum of direct materials, direct labour and factory overheads.

**Cost to make and sell**

The cost to make and sell is the sum of the cost of production or manufacture, and the selling, general and administration costs associated with the sale of those goods.

**Country of origin**

The country in which the last significant process in the manufacture or production of the goods was performed.

**Date of sale**

The Commission will normally use the invoice date as recorded in the exporter or producer’s records. Another date may be used if this better reflects the material terms of sale. The questionnaire directs attention to matching data sets of domestic and export sales where some other date is used, as well as matching cost information.

**Direct labour cost**

Direct labour is categorised as a variable cost, i.e. the value varies with the level of production.
Dumping

Dumping occurs when the products of one country are exported to another country at a price less than their normal value.

Dumping margin

Where the export price is less than the normal value the dumping margin is the amount of the difference. It can be expressed as a value or as a percentage of the export price.

Export price

The export price of the goods is usually the price paid or payable to the exporter in arms length transactions, in most instances calculated at the Free on Board (FOB) level.

Exporting country

The country of export is normally the country of origin from which the goods are shipped. The country of export may be an intermediate country, except where the products are merely transhipped through that country, or the products concerned are not produced in that country, and there is no comparable price in that country.

Factory overheads

Factory overheads consist of variable costs e.g. power, supplies, indirect labour and fixed costs e.g. factory rent, factory insurance, factory depreciation etc.

Goods under consideration (the goods)

The goods to which the application for anti-dumping action relates. That is, the goods that you have exported to Australia allegedly at dumped prices.

Incoterms

The following abbreviations are commonly used (comment is provided concerning costs that are normally borne by the seller):

- EXW: ex works (the seller’s minimum obligation as costs relate to goods being made available at the sellers premises)
- FCA: free carrier (main carriage not paid by seller. Pay costs until such time that the goods have been delivered at the named point into custody of a carrier named by the seller. Customs formalities, taxes etc. paid if required)
- FAS: free alongside ship (main carriage not paid by seller. Deliver the goods alongside the ship)
- FOB: free on board (main carriage not paid by seller. Deliver the goods on board, provide export clearance if required, pay loading costs to the point the goods have passed the ship’s rail, pay customs formalities, taxes etc. payable upon exportation)
- CFR: cost and freight (main carriage paid by seller. Pay all costs until delivered as well as freight, loading and unloading, pay customs formalities, taxes etc. payable upon exportation)
- CIF: cost, insurance and freight (main carriage paid by seller. Pay all costs as under CFR as well as marine insurance)
- CPT: carriage paid to
- CIP: carriage and insurance paid to
- DAF: delivered at frontier (goods carried by rail or road and cleared for export at the named place at the frontier. Pay costs until delivered at the frontier plus any discharge costs incurred to place the goods at the customer’s disposal)
- DES: delivered ex ship (goods made available to the buyer on board the ship uncleared for import at the named port of destination. Pay all costs incurred in placed at the disposal of the buyer, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
- DDU: delivered duty unpaid (Pay all costs for carriage to the agreed point, pay customs formalities, taxes etc.)
DDP

delivered duty paid (goods made available at the named place in the country of importation – all risks and costs being incurred by the seller including duties, taxes etc. incurred upon importation)

The period

A period defined by the Commission over which importations of the goods are examined.

Like goods

Like goods are goods sold on the domestic market of the country of export (or to a third country) that are identical in all respects to the goods or that, although not alike in all respects have characteristics closely resembling those of the goods. The term 'like goods' also refers to the goods produced by the Australian industry allegedly being injured by dumped imports.

Normal value

Australian legislation sets out several ways to assess "normal value".

The preferred method is to use the price paid for like goods sold for domestic consumption in the country of export. Usually, these sales are made by you, but there may be circumstances where it is appropriate to use sales made by other sellers on the domestic market.

Sale prices must be at arms length and in the ordinary course of trade. In the absence of relevant or suitable domestic sales, the normal value may be determined by constructing a price based on all costs to make and sell the goods, and an amount for profit. Alternatively the normal value may be ascertained using the price paid for like goods sold in the ordinary course of trade at arms length to customers in a country other than Australia, however this option is rarely used.

Finally, when a normal value cannot be ascertained by any of the above methods, or if no information is provided, the Commission will determine the normal value by considering all the relevant information, including the applicant's information. This allows the applicant's information to be used where sufficient information has not been furnished or is not available.

Where domestic price generally, and the trade of the exporting country are determined or substantially influenced by the government of the exporting country, an alternative/surrogate market economy is selected by the Commission and the normal value is determined as if the surrogate country were the export source.

Ordinary course of trade

Testing for "ordinary course of trade" includes a comparison of the selling price and the unit cost to make and sell for the same period. If sales in respect of a substantial quantity of goods over an extended period of time, usually 12 months, do not recover all costs and these losses are not likely to be recovered within a reasonable period of time, (again usually 12 months) then the sales are regarded as being not in the ordinary course of trade.

There may be circumstances where it is appropriate to use a period other than 12 months in assessing whether sales are in the ordinary course of trade.

Unprofitable sales are to be taken to have occurred in substantial quantities during an extended period where the unprofitable sales amount to 20% or more of the total volume of sales of the goods by the exporter over the period. An extended period of time is usually taken to be a period not less than 12 months. Where unprofitable sales are rejected, normal value is based upon remaining profitable sales provided they occur in sufficient number. Where all sales have been made at a loss, or profitable sales are insufficient, the normal value may be constructed from costs to make and sell.

Selling, general and administration expenses (SG&A)

The selling, general and administration expenses includes all selling, distribution, general and administration expenses including finance costs that would be incurred if the goods were sold for domestic consumption in the country of export. The amounts are determined in each case using all the available information and may include expenses incurred in:

- domestic sales of like goods;
sale of goods of the same general category by the exporter; or

sales in the industry in the country of export.

The expenses must, however, reflect the selling, general and administration costs of the goods. Administrative and selling expenses include: director’s fees, management salaries and benefits, office salaries and benefits, office supplies, insurance, promotion, entertainment, depreciation and corporate overheads.