

VIA E-MAIL

October 21, 2019

Ms Jenny Levin
Mr Carl Halpin
CC.: Mr Gavin Crooks
Anti-Dumping Commission
55 Collins Street VIC 3000
Melbourne, Australia

Our Client: Zhuhai Grand Kitchenware Co., Ltd.

Case No.: 517

Re: Factual submission on Zhuhai Grand's purchase of cold-rolled stainless steel

Dear Ms Levin,

Dear Mr Halpin,

This factual submission intends to provide further facts surrounding Zhuhai Grand's purchase of cold-rolled stainless steel, a topic concerning the allegation of the Government of China's provision of cold-rolled stainless steel at less than fair market value and an issue raised during the on-spot verification during September 16-20, 2019.

1. It has been previously reported and then later verified that Zhuhai Grand purchased the main input for the production of deep drawn stainless steel sinks ("the goods under consideration" or "GUC") via [CONFIDENTIAL – TRADER NAME] during the inquiry period ("IP"). Out of the [CONFIDENTIAL – PURCHASE VOLUME] tons of stainless steel purchased during the IP, [CONFIDENTIAL - PERCENTAGE]% was purchased via [CONFIDENTIAL – TRADER NAME], all within the first half of the IP. In the second half of the IP Zhuhai Grand purchased directly from private, unrelated suppliers, which is still the case after the IP. This was reported in Zhuhai Grand's reply to the exporter questionnaire (See Table G-7.4).
2. On behalf of our client, we respectfully submit that the cold-rolled stainless steel purchased was at market value prevailing in China on a commercial basis, and therefore Zhuhai Grand did not benefit from the provision of raw materials in the form of 304-grade cold rolled stainless steel coil by the Government of China ("GOC") at less than adequate remuneration.
3. For the sake of clarity, our explanation on Zhuhai Grand's purchases is divided into two parts: a) procurement model one for the first half of the IP, and b) procurement

model two for the second half of the IP.

The First Half of the IP: Procurement Model One

[CONFIDENTIAL – DESCRIPTION OF PROCUREMENT OF RAW MATERIALS]

The Second Half of the IP: Procurement Model Two

[CONFIDENTIAL – DESCRIPTION OF PROCUREMENT OF RAW MATERIALS]

4. In light of the above, we respectfully request that the Commission take into consideration of this factual submission and not determine that Zhuhai Grand was subsidized in this regard.

As always, we rest at the Commission's disposal for any further questions.

Sincerely,

AllBright Law Offices (Beijing)

Annexes:

Annex I: Revised purchase listing (contains business confidential information and not susceptible of summary)

Annex II: purchase documents concerning the purchase of cold-rolled stainless steels from [**CONFIDENTIAL – TRADER NAME**] (contains business confidential information and not susceptible of summary)