



Exporter Questionnaire

Case number: 520

Product: Certain grinding balls

From: The People's Republic of China (China)

Review period: 1 July 2018 to 30 June 2019 (the period)

Response due by: 28 August 2019

Case manager: Ben Merlin

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Return completed questionnaire to:
investigations1@adcommission.gov.au

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

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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 and/or in receipt of countervailable subsidies, are:

Ferrous grinding balls, typically used for the comminution of metalliferous ores:

- whether or not containing alloys;
- cast or forged;
- with diameters in the range 22 mm to 170 mm (inclusive).

The following description are excluded from measures:

- stainless steel balls;
- precision balls that have been machined and/or polished; and
- ball bearings.

Model Control Code

Details of the model control code (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.

Item	Category	Sub-category	Identifier	Sales Data	Cost data	Key category
1	Production method	Cast	C	Mandatory	Mandatory	Yes
		Forged	F			
2	Diameter	Diameter in mm	### ¹	Mandatory	Mandatory	No
3	Product code	Internal grade/model	### ²	Mandatory	Optional	No

In constructing a MCC, use a "-" between each category. For example: C-100-X would indicate cast grinding balls with a 100 mm diameter and grade/model 'X'.

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, otherwise the response may be deemed deficient.

¹ Use a separate identifier for each diameter, e.g. 25mm, 30mm 35mm etc. The Commission may group certain categories of diameter in formulating a final MCC.

² The 'product code' category, if applicable, refers to the company's internal identifier for the model, grade or type of the goods, differentiated by the chemical composition of the grinding ball.

SECTION A COMPANY INFORMATION

[Special attention]

Before our full response to the exporter questionnaire, we would like to give a brief introduction regarding the background of our company. So that the anti-dumping commission would have a better understanding of our response.

1. The company changed its name

Shandong Iraeta Heavy Industry Stock Co., Ltd. was funded in 2006. To meet the company's development, Shandong Iraeta Heavy Industry Stock Co., Ltd. decided to change its name to Iraeta Energy Equipment Co., Ltd. (Hereafter referred to as "Iraeta") The new name gets approved by the registration authority in China and becomes effective on April 29th, 2019. Therefore, we would use "Iraeta Energy Equipment Co., Ltd." to respond to this questionnaire.

[Redacted]

[Redacted]

[Redacted] [Confidential, Iraeta's
production arrangement]

A-1 Company representative and location

1. Please nominate a contact person within your company:

Name: [Redacted]
Position in the company: **Export Manager**
Telephone: [Redacted]
E-mail address: [Redacted]

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

Name: **Mr John Bracic**
Address: **J.Bracic & Associates Pty Ltd
PO Box 3206, Manuka ACT 2603, AUSTRALIA**
Telephone: **+61 (0)499056729**
E-mail address: **john@jbracic.com.au**

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 the where the company's financial records are held.

RESPONSE:

Iraeta's financial records are held at the registered address, which is No.9001, Jiwang Road, Guangzhuang sub-district office, Zhangqiu District, Jinan City.

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

RESPONSE:

Iraeta's production records are held at the registered address, which is No.9001, Jiwang Road, Guangzhuang sub-district office, Zhangqiu District, Jinan City.

A-2 Company information

1. What is the legal name of your business?

RESPONSE:

The legal name of our company is Iraeta Energy Equipment Co., Ltd.

2. Does your company trade under a different name and/or brand? If yes, provide details.

RESPONSE:

Iraeta traded under its previous company name, Shandong Iraeta Heavy Industry Stock Co. Ltd., prior to April 29th, 2019 and is under Iraeta Energy Equipment Co., Ltd ever since.

3. Was your company ever known by a different legal and/or trading name? If yes, provide details

RESPONSE:

Iraeta was known by Shandong Iraeta Heavy Industry Stock Co. Ltd. before April 29th, 2019 and changed its name to Iraeta Energy Equipment Co., Ltd since the same day.

4. Provide a list of your current board of directors and any changes in the last two years.

RESPONSE:

Please refer to [Attachment A-2.4 List of board of directors](#) for the list of board of directors and there is 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

RESPONSE:

Please refer to [Attachment A-2.5 Ownership structure](#) for the required information regarding Iraeta and its related companies.

6. Is your company or parent company publicly listed?

If yes, please provide:

(a) The stock exchange where it is listed; and

(b) Any principle shareholders³

If no, please provide:

(a) A list of all principal shareholders and the shareholding percentages.

RESPONSE:

Not applicable, neither Iraeta nor its parent company is publicly listed. Please refer to [Attachment A-2.5](#) for information regarding shareholders.

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.

RESPONSE:

Iraeta is [REDACTED]

³ 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.

[Redacted]
[Redacted]
[Redacted] [Confid

ential, Iraeta's production and sales information]

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.

RESPONSE:

Not applicable. Iraeta is manufacturer of the goods under consideration ("GUC"), selling GUC to both domestic and foreign customers. During POR, Iraeta did not export GUC to Australia.

9. Provide your company's internal organisation chart.

RESPONSE:

Please refer to [Attachment A-2.9 Internal organisation chart](#).

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

RESPONSE:

Please refer to [Attachment A-2.9](#).

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

RESPONSE:

Please refer to [Attachment A-2.11 Brochure](#).

A-3 General accounting information

1. What is your financial accounting period?

RESPONSE:

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

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

RESPONSE:

Yes, financial accounts of Shandong Iraeta are [Redacted]

[Redacted]. **[Confidential, Auditor's name]**

3. What currency are your accounts kept in?

RESPONSE:

The accounts of Iraeta are kept in CNY.

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

RESPONSE:

Iraeta uses Gold abacus 8e ERP as the financial accounting system.

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5. What is the name of your sales system?
RESPONSE:
Iraeta uses Gold abacus 8e ERP as the sales system.
6. What is the name of your production system?
RESPONSE:
Iraeta uses Gold abacus 8e ERP as the production system.
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.
RESPONSE:
Not applicable, the financial accounting system, sale and production systems of Iraeta are the same.
8. Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If yes, please provide details.
RESPONSE:
The accounting practices of Iraeta follows the GAAP in China.
9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.
RESPONSE:
No, the accounting practices of Iraeta has not changed 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.
RESPONSE:
Please refer to Attachment A-4.1 Annual reports for the annual reports of Iraeta for 2017 and 2018. No other related company is involved in the production and sale of PUC.
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.
RESPONSE:
Not applicable, the annual reports provided in Attachment A-4.1 have been audited.
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.
RESPONSE:
No, Iraeta maintains one profit centre only.
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.

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RESPONSE:

Please refer to [Attachment A-4.4 Income statements](#) for Iraeta's income statements of March 2019.

5. Please provide a copy of your company's trial balance covering the most recent financial year.

RESPONSE:

Please refer to [Attachment A-4.5 Trial balance of 2018](#) for Iraeta's trial balance of 2018.

6. Please provide your company's chart of accounts

RESPONSE:

Please refer to [Attachment A-4.6 Chart of accounts](#).

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

SECTION B EXPORT SALES TO AUSTRALIA

If your company exported low or no volumes of the goods to Australia during the review period, please contact the case manager as soon as possible. You may be required to complete this section (and G-5) as it relates to export sales to a country other than Australia. You may also be asked other supplementary questions. Extensions will not be granted as a result of delays in contacting the case manager in this regard.

RESPONSE:

Shandong Ireata did not sell PUC to Australia during POR. Ireata are willing to submit sales information relating to an appropriate third country selected by the Commission.

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

RESPONSE:

Not applicable.

2. In what currency do you invoice your customers for goods exported to Australia? 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?

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable.

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.

RESPONSE:

Not applicable.

6. Did you provide on-invoice discounts and/or off-invoice rebates to any customer or an associate of the customer in relation to the sale of the goods exported to Australia during the period? If yes,

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provide a description and explain the terms and conditions that must be met by the customer to obtain the discount.

RESPONSE:

Not applicable.

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 exported to Australia during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

RESPONSE:

Not applicable.

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?

RESPONSE:

Not applicable.

B-2 Australian sales listing

1. Complete the worksheet named "B-2 Australian sales"

- This worksheet lists all sales (i.e. transaction by transaction) exported to Australia of the goods invoiced within the period. This includes exports to Australia sold through a domestic customer.
- 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.

RESPONSE:

Not applicable.

2. Provide a table listing the source of the data for each column in the "B-2 Australian sales" listing.

RESPONSE:

Not applicable.

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.

RESPONSE:

Not applicable.

2. For each document, please annotate the documents or provide a table reconciling the details in the “B-2 Australian sales” listing to the source documents in B-3.1.

RESPONSE:

Not applicable.

B-4 Reconciliation of sales to financial accounts

1. Please complete the worksheet named “B-4 Upwards sales” to demonstrate that the sales listings 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.

RESPONSE:

Please refer to [Attachment B-4 Upward sales](#).

2. Please provide all documents, other than those in A-4, B-2 and D-2, required to complete the “B-4 Upwards sales” worksheet. If the documents include spreadsheets, all formulas used must be retained.

RESPONSE:

Please refer to [Attachment B-4.1 Data source of upward sales](#).

3. For any amount in the “B-4 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 D of the worksheet; and
 - highlight or annotate the amount shown in the source document.

RESPONSE:

Please refer to [Attachment B-4.1](#).

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.

RESPONSE:

Please refer to [Attachment B-5.1 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.

RESPONSE:

Please refer to [Attachment B-5.2 Source documents of selling expense](#).

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.

RESPONSE:

Not applicable, Shandong Ireata did not sell PUC to Australia during POR.

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.

RESPONSE:

Not applicable

1. 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.

RESPONSE:

Not applicable

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.

RESPONSE:

As explained earlier, Ireata manufactures [REDACTED]

[REDACTED]. [Confidential, Ireata's production information]

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.

RESPONSE:

Refer to table below.

MCC
Forged-B2-100
Forged-B2-105
Forged-B2-120
Forged-B2-125
Forged-B2-25
Forged-B2-30
Forged-B2-40
Forged-B2-50
Forged-B2-60
Forged-B2-65
Forged-B2-70
Forged-B2-75
Forged-B2-80
Forged-B2-90
Forged-B2-Mix
Forged-B3-100
Forged-B3-115
Forged-B3-120
Forged-B3-125
Forged-B3-80

C-3 Internal product codes

1. Does your company use product codes or stock keeping unit (SKU) codes?

If yes:

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- (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.

RESPONSE:

Iraeta [REDACTED]
[REDACTED]
[REDACTED].

[Confidential, Iraeta's production information]

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

RESPONSE:

The steps of sales negotiation process for domestic customers are as follows

- 1) contact the potential customer in the market place through various channels, and preliminarily negotiate with those customers with intent to purchase products;
 - 2) offer the price to the potential customer and further negotiate;
 - 3) conclude the contract if the agreement is reached;
 - 4) fully or partly prepaid;
 - 5) arrangement of production, and delivery of goods;
 - 6) collection of down payment (if any) and issuance of invoice.
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.

RESPONSE:

Not applicable, none of domestic customers is related to Iraeta.

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

RESPONSE:

No, there is no price list of Iraeta.

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.

RESPONSE:

No, the domestic selling price set by Iraeta is based on market situations and cost of productions.

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.

RESPONSE:

No, Iraeta does not provide on-invoice discounts 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.

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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.

RESPONSE:

No, Iraeta does not issue any credit or debit notes to the customer or associate of the customer in relation to the sale of the like goods during the period.

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:
- What date are you claiming as the date of sale?
 - Why does this date best reflects the material terms of sale?

RESPONSE:

The invoice date is the date of sale on which the material terms of sale has been set including the PUC to be delivered by Iraeta and the amount to be paid by the customer.

D-2 Domestic sales listing

- 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 B-1.8 and/or 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.

RESPONSE:

Please refer to [Attachment D-2 Domestic sales](#).

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

RESPONSE:

Please refer to [Attachment D-2.1 Data source of domestic sales](#).

D-3 Sample domestic sales documents

- 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.

RESPONSE:

Please refer to [Attachment D-3.1 Domestic sales document](#) for required documents.

- 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).

RESPONSE:

Please refer to [Attachment D-2.1](#), in which we have listed data reported in [Attachment D-2](#) that reconcile with the documents that provided in [Attachment D-3.1](#) which are with corresponding notes.

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 listings in 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.

RESPONSE:

Please refer to [Attachment B-4 Upward sales](#).

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.

RESPONSE:

Please refer to [Attachment B-4.1 Data source of upward 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.

RESPONSE:

Please refer to [Attachment B-4.1](#).

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?

RESPONSE:

No, Iraeta does not provide credit to any domestic customers in relation to sales of like goods.

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?

RESPONSE:

No, Iraeta does not provide credit to any domestic customers in relation to sales of like goods.

E-2 Packaging

1. What is the packaging used for your domestic sales of like goods?

RESPONSE:

[REDACTED] are used for the package of domestic sales of PUC.

[Confidential, description of package.]

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

RESPONSE:

Not applicable, Iraeta did not sell PUC to Australia during POR.

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

RESPONSE:

No, there is no difference in package between Iraeta's domestic and export sales.

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?

RESPONSE:

Yes,

[Redacted]
[Redacted]
[Redacted]. [Confidential, domestic sales information of Iraeta]

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

RESPONSE:

Not applicable, Iraeta did not sell PUC to Australia during POR.

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?

RESPONSE:

Not applicable, Iraeta did not sell PUC to Australia during POR.

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?

RESPONSE:

Not applicable, Iraeta did not sell PUC to Australia during POR.

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?

RESPONSE:

Not applicable, Iraeta did not sell PUC to Australia during POR.

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?

RESPONSE:

Not applicable, Iraeta did not sell PUC to Australia during POR.

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.

RESPONSE:

No, Iraeta does not provide sales commission for domestic sales of PUC or export sales of PUC.

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?

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- Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?

RESPONSE:

The tax liability of domestic and export sales are as follows:

	Domestic sales	Export sales
VAT rate	17% before May 1 st , 2018 16% since May 1 st , 2018.	0%
VAT records	VAT of domestic sales is recorded as VAT payables	VAT refund from export sales is recorded into COGS.
VAT refund rate	0	13%
Remission/drawback of duties on inputs	0	0

Please note that as of 1 April 2019, the VAT refund rate is equal to the VAT rate payable on exports, which results in no residual export VAT.

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

RESPONSE:

All the direct selling expenses have been identified in [Attachment D-2 Domestic sales](#).

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

RESPONSE:

Not applicable, Iraeta did not sell PUC to Australia during POR.

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 15 of the *Dumping and Subsidy Manual (November 2018)* for more information.

RESPONSE:

No, no other adjustment is claimed by Iraeta.

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.

RESPONSE:

Not applicable, Iraeta did not sell PUC to Australia during POR. And Iraeta sells PUC to customers in third countries directly.

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.

RESPONSE:

No third country customer is related to Iraeta.

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?

RESPONSE:

The invoice date is the date of sale on which the material terms of sale has been set which includes the PUC to be delivered by Iraeta and the amount to be paid by the customer.

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.

RESPONSE:

Please refer to [Attachment F-2 Third country sales](#).

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

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.

RESPONSE:

Not applicable, Iraeta did not sell PUC to Australia during POR.

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.

RESPONSE:

Please refer to [Attachment G-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.

RESPONSE:

Not applicable, no supplier is related to Iraeta.

G-2. Cost accounting practices

1. Is your company's cost accounting system based on actual or standard costs (budgeted)?

RESPONSE:

The cost accounting system of Iraeta is based on actual cost.

2. If your 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.

RESPONSE:

Not applicable, the cost accounting system of Iraeta is based on actual 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.

RESPONSE:

No, Iraeta has one cost center only.

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

Iraeta [REDACTED]

[Confidential, cost information of Iraeta]

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

RESPONSE:

No, no cost for management accounting purpose 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.

RESPONSE:

No, Iraeta does not engage in any start-up operation.

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)?

RESPONSE:

Please refer to [Attachment A-4-1](#) for information relating to the method of valuation for raw material, work-in-process, and finished goods inventories.

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

RESPONSE:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]. [Confidential, accounting information of Iraeta]

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

RESPONSE:

[REDACTED]
[REDACTED]
[REDACTED]. [Confidential, accounting information of Iraeta]

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

RESPONSE:

No management fees/corporate allocations charged to Iraeta by its parent or related company.

G-3 Cost to make on domestic market

- 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 B-1.8 and/or 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.

RESPONSE:

Please refer to [Attachment G-3 Domestic CTM](#).

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

RESPONSE:

Please refer to [Attachment G-3.1 Data source of domestic CTM](#).

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.

RESPONSE:

Please refer to [Attachment 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.

RESPONSE:

Please refer to [Attachment G-4.2 Domestic SG&A calculation](#).

G-5 Cost to make the goods exported to Australia

1. Complete the worksheet named "G-5 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.

RESPONSE:

Not applicable, Iraeta did not sell PUC to Australia during POR.

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

RESPONSE:

Not applicable, Iraeta did not sell PUC to Australia during POR.

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

RESPONSE:

[REDACTED]

[REDACTED] . [Confidential, cost information of Iraeta]

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.

RESPONSE:

[REDACTED]

[REDACTED] . [Confidential, cost information of Iraeta]

G-7 Major raw material costs

1. What are the major raw materials used in the manufacture of the goods?

RESPONSE:

The major raw material used in the manufacture of the goods is round bar.

2. Are any raw materials sourced as part of an integrated production process or 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.

RESPONSE:

No, the raw material is purchased from independent third party.

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

RESPONSE:

Please refer to [Attachment G-7.3 Material ratio](#).

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.

RESPONSE:

Iraeta purchases special round bar for the production of grinding ball which is the only material exceeding 10% of the CTM. Please refer to [Attachment I-6 Steel Billet](#) for required information regarding raw material.

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

Information used to prepare round bar purchase listing comes from inventory ledger and purchase invoices.

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 in “G-7.4 Raw material purchases” listing to relevant purchase ledgers or trial balances in your accounting system. Provide copies of all documents used to demonstrate the reconciliation.

RESPONSE:

Please refer to [Attachment G-7.5 Raw material purchase documents](#).

7. Are any of the suppliers in “G-7.4 Raw material purchases” listing related to your company? If yes, please provide details on how the price is set.

RESPONSE:

No, no supplier is related to Iraeta.

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

1. Please complete the worksheet named “G-8 Upwards costs” to demonstrate that the cost listings in G-3 and G-5 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.

RESPONSE:

Please refer to [Attachment G-8.1 Upwards costs](#).

2. Please provide any documents, other than those in A-4, G-3 and G-5, required to complete the “G-8 Upwards costs” worksheet.

RESPONSE:

Please refer to [Attachment G-8.2 Data source of upwards costs for required documents](#).

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 D of the worksheet; and
 - highlight or annotate the amount shown in the source document.

RESPONSE:

Please refer to [Attachment G-8.1](#) for the source document name, and [Attachment G-8.2](#) for notes showing the data we reported.

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.

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.

RESPONSE:

Iraeta has little interaction with the GOC other than normal administrative dealings such as filing of tax returns, applying for business licence, etc. Other than these typical interactions, Iraeta does not interact with the GOC on broader policy matters.

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).

RESPONSE:

Not applicable. As confirmed in the submitted corporate structure, Iraeta is a joint-venture entity between a foreign entity and local Chinese person.

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

RESPONSE:

Refer to Attachment A-2.4 List of board of directors.

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

RESPONSE:

Not applicable.

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 GOC (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 GOC.

RESPONSE:

Not applicable.

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.

RESPONSE:

PUBLIC VERSION

Not applicable.

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 GOC? If yes, identify any relevant government department(s) they are affiliated with.

RESPONSE:

Not applicable.

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 GOC;
 - employees of your business;
 - foreign investors; or
 - other (please specify).

RESPONSE:

Refer to corporate structure for shareholdings.

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

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable.

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.

RESPONSE:

Not applicable.

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.

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable.

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

RESPONSE:

The shareholder's meeting or the director's meeting has the authority to reward, hire, fire or discipline the business' senior managers and executives.

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

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable. It is unclear what a pricing committee relates to, but Iraeta can confirm that it has no such designated pricing committee within its operations.

H-3 Licensing

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

RESPONSE:

Please refer to [Attachment H-3.1 Business Licenses](#).

2. Identify the GOC departments or offices responsible for issuing the license(s).

RESPONSE:

Please refer to [Attachment H-3.1](#).

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

RESPONSE:

The procedure involved in applying for the license are as follows:

Apply for business license	1. Notice of enterprise name verification 2. Lease agreement (signed by shareholder) 3. Copy of property ownership certificate 4. Resolution of shareholder meeting 5. Articles of incorporation 6. Copy of shareholder's ID card 7. Application for company establishment 8. Letter of attorney 9. Capital verification report 10. Seal carving
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4. Describe any requirements or conditions that must be met in order to obtain the license(s).

RESPONSE:

No requirements or conditions must be met in order to obtain the license, provided that the company follows steps introduced above.

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

RESPONSE:

No specific restriction is imposed on the business license, other than operating under the scope of business indicated in the Business license.

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

RESPONSE:

PUBLIC VERSION

If any of the items 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.

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

RESPONSE:

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).

RESPONSE:

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:

I. 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 than 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 than 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.

RESPONSE:

The shareholders have the authority to:

- (a) determine the Company's business policies and investment plans;
- (b) elect and replace executive director or supervisors not assumed by staff representatives, and decide upon matters relating to the remuneration of executive director or supervisors;
- (c) consider and approve reports by the executive director;
- (d) consider and approve reports by the supervisors;
- (e) consider and approve annual financial budget plans and final accounting plans of the Company;
- (f) consider and approve profit distribution plans and plans to cover company losses;
- (g) adopt resolutions on the increase or reduction of the registered capital of the Company;
- (h) adopt resolutions relating to merger, division, change of corporate form, dissolution and liquidation of the Company; and
- (i) amend the articles of association.

Shareholders of the company, essentially, have the same powers of shareholders of any company incorporated in Australia.

The board of directors has the authority to:

- (a) determine the Company's business policies and investment plans;**
- (b) prepare annual financial budget plans and final accounting plans of the Company;**
- (c) prepare profit distribution plans and plans to cover company losses;**
- (d) consider and approve reports by the supervisors;**
- (d) prepare plans for increasing or reducing registered capital by the company, and plans to issue company bonds;**
- (e) draw up plans for the merger, division, dissolution and transformation of the Company;**
- (f) determine the structure of the Company's internal management;**
- (g) appoint or dismiss managers of the Company and decide on their remunerations. According to the manager's nomination, appoint or to dismiss deputy managers and financial officers; and to determine their remunerations; and**
- (h) develop basic management system of the company.**

The Board of Directors of the company, essentially, have the same powers and duties as a board of directors of a company incorporated in Australia. Further, day-to-day management of the company is vested in the senior management of the company.

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

RESPONSE:

Not applicable. Iraeta is not aware of any input into the decision-making process about manufacture, 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.

RESPONSE:

Not applicable. Iraeta is not aware of any input into the decision-making process about manufacture, marketing and sale of steel products.

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

RESPONSE:

Not applicable. Iraeta is not aware of any reports required to be submitted to the GOC periodically.

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.

RESPONSE:

Not applicable. Iraeta is not aware of such plans.

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 GOC (including the National Development and Reform Commission).

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable.

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

RESPONSE:

Prices are generally decided by negotiation with customers on a transaction basis with reference to the market situation in the relevant country. There is no such notes to business meeting concerning pricing.

H-5 Financial and investment activities

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

RESPONSE:

All of the lenders are as follows:

██
██
██
██
██

[Confidential, information relating to Iraeta's lenders]

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

RESPONSE:

The interest rate of Iraeta is from ██████████. [Confidential, information relating to interest rate]

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

RESPONSE:

Not applicable.

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.

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable.

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).

RESPONSE:

No, Iraeta did not invest in either government or non-government debt securities.

H-6 Government policy on the industry

1. Are there any GOC 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:
- copy of the documentation and a translation in English;
 - documentation concerning the GOC or any association of the GOC's notification of the measures concerning the goods to your company during the period.

RESPONSE:

Not applicable. Iraeta is not aware of such GOC opinions, directives, decrees, promulgations, measures, etc. concerning the iron and steel industry/sector that were put in place or operating during the period.

2. Provide information concerning the name of any GOC departments, bureaus or agencies responsible for the administration of all GOC 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.

RESPONSE:

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

Department: National Development and Reform Commission ("NDRC")

Address: 38 South Yuetan Street, Xicheng District, Beijing 100824

Phone number: 86-10-6850 1428

Fax number: 86-10-6850 2999

Department: Ministry of Industry and Information Technology ("MIIT")

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Address: 13 West Changan Street, Xicheng District, Beijing 100804

Phone number: 86-10-6601 1228

Fax number: 86-10-6601 1228

Department: Ministry of Environmental Protection (“MEP”)

Address: 115 Nanxiao Street, Xizhimen Nei, Beijing 100035

Phone number: 86-10-6655 6163

Fax number: 86-10-6655 6165

Department: Ministry of Land and Resources

Address: 64 Funei Avenue, Xicheng District, Beijing 100812

Phone number: 86-10-6655 8424

Fax number: 86-10-6655 8004

Agency: China Banking Regulatory Commission (“CBRC”)

Address: 15 Financial Avenue, Xicheng District, Beijing 100800

Phone number: 86-10-6627 9378

Fax number: 86-10-6629 9144

Department: Department of Foreign Trade of the Ministry of Commerce (“MOFCOM”)

Address: 2 Dongchang’an Road, Beijing, 100731

Phone number: 86-10-6519 7107

Fax number: 86-10-6519 7447

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?

RESPONSE:

Not applicable. Ireata is not involved in the development of government policies or industrial plans.

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

RESPONSE:

Not applicable.

5. Has the GOC 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 GOC plans, policies, or measures as support for receiving the financing that you report.

RESPONSE:

Not applicable. Ireata is not aware of any such designation.

H-7 Taxation

1. Were there any export taxes on the exports of the goods during the period?

RESPONSE:

Ireata is not aware of any export taxes applicable to grinding balls.

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

RESPONSE:

From April, 2018 to August, 2018, the VAT rebate applicable to exports of the goods is 5%, From September, 2018 to March, 2019, the VAT rebate on exports of grinding balls is 13%, the VAT rebate rate is 5%. From April 2019, the VAT rate and VAT rebate are both set at 13% meaning that there is no residual VAT on exports.

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 GOC notices regarding these changes, including the relevant appendices.

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable.

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.

RESPONSE:

Sales terms are negotiated between a team of sales staff within Ireata and its customers. A sales manager will have a final confirmation to the sales conditions. If all the sales terms are acceptable, the contract will then be concluded and the purchase order will be confirmed.

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

RESPONSE:

The selling price of the goods is determined by negotiation between Ireata and their customers with a reference to the prevailing market price and taking into account the supply and demand conditions at the time. There are no restrictions, limitations, or other considerations imposed on the business.

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

RESPONSE:

No. The selling price of the goods is determined by negotiation only between Ireata and their customers.

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

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable.

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 GOC with the associations.

RESPONSE:

Iraeta is a member of China Iron and Steel Association.

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 GOC concerning the industry.

RESPONSE:

The purpose of CISA is to represent the interests and to protect the legitimate rights of its members, to serve for enterprises, industry and society. CISA conducts industry surveys and research so as to provide effective guidance or advice to its members, promotes the communication of management and technological information, and organizes training programs etc.

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.

RESPONSE:

Except for provision of regular financial information for taxation purposes, Ireata is not aware of any information provided to the Chinese Bureau of Statistics.

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.

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable.

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.

RESPONSE:

Not applicable.

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?

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable.

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 GOC.

RESPONSE:

Not applicable.

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.

RESPONSE:

Refer to [Attachment D-2](#) for listing of domestic customer details.

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.

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable.

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.

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable.

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

RESPONSE:

Not applicable. As explained in Ireata's application, its Grinding Ball Division was only recently established in 2015.

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?

RESPONSE:

Not applicable.

H-13 Sales price

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

RESPONSE:

No. The selling price of the goods is determined by negotiation between Ireata and their customers with a reference to the market price. There are no restrictions, limitations, or other considerations imposed on the business.

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

RESPONSE:

No. The purchase price of raw materials is determined by negotiation between Ireata and their suppliers with a reference to the market price. There are no restrictions, limitations, or other considerations imposed on the business.

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

RESPONSE:

No. The selling price of the goods is determined by negotiation between Ireata and their customers with a reference to the market price. There are no restrictions, limitations, or other considerations imposed on the business.

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.

RESPONSE:

The selling price of the goods is determined by negotiation between Ireata and their customers with a reference to the prevailing market price. There are no restrictions, limitations, or other considerations imposed on the business. Selling prices are determined according to normal supply and demand conditions.

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

RESPONSE:

Ireata is not aware of any price leaders in the grinding ball market.

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.

RESPONSE:

Iraeta does not have a pricing committee in respect of the goods. As we stated above, the sale price of the goods is subject to negotiation on a transaction basis taking into account the prevailing market conditions.

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.

RESPONSE:

Not applicable.

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

RESPONSE:

Sales terms are negotiated between a team of sales staff within Iraeta and its customers. A sales manager will have a final confirmation to the sales conditions. If all the sales terms are acceptable, the contract will then concluded and the purchase order will be confirmed.

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.

RESPONSE:

Not applicable.

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.

RESPONSE:

Besides the normal administrative processes relevant to all entities in China, Iraeta is not aware of any specific guidelines or approval processes relating to capacity or joint-ventures.

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.

RESPONSE:

Not applicable, as only Iraeta's management/shareholders are responsible for decision making of capacity issues.

H-15 Raw materials

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

RESPONSE:

Please refer to [Attachment I-6 Steel billet](#) for suppliers.

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

RESPONSE:

Please refer to [Attachment I-6 Steel billet](#) for suppliers.

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

RESPONSE:

Not applicable.

4. Is there a price difference in purchase price for raw materials between your suppliers? If yes, provide a detailed explanation.

RESPONSE:

Price differences between suppliers reflects factors such as time of order, specification, delivery terms, etc.

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.

RESPONSE:

According to the production schedule of the company, the supply department will arrange the purchase of raw materials based on competing spot prices offers from various suppliers. Selection of a supplier takes into account delivery time, competing price offers, credit terms and quality specification. Purchases are not made by tender.

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.

RESPONSE:

Not applicable.

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.

RESPONSE:

Not applicable.

H-16 Export quotas

1. Are grinding balls sold by your company subject to any export quotas? If so, explain why grinding balls are subject to quotas and the method by which the quotas are allocated.

Does this process involve any Government of China participation in determining the selling prices of the goods? If so, explain.

RESPONSE:

No.

2. If grinding balls are not presently subject to export quotas, indicate if quotas existed during the investigation period and when and why they were removed.

RESPONSE:

No quotas exist.

SECTION I COUNTERVAILING

The following programs are being investigated:

Program Number	Program Name	Program Type
3	Preferential Tax Policies in the Western Regions	Income Tax
4	Land Use Tax deduction	Income Tax
5	Preferential Tax Policies for High and New Technology Enterprises	Income Tax
6	Tariff and VAT Exemptions on Imported Materials and Equipment	Tariff & VAT
7	One-Time Awards to Enterprises Whose Products Qualify for “Well-Known TradeMarks of China” and “Famous Brands of China”	Grant
8	Matching Funds for International Market Development for Small and Medium Enterprises	Grant
9	Superstar Enterprise Grant	Grant
10	Research & Development (“R&D”) Grant	Grant
11	Innovative Experimental Enterprise Grant	Grant
12	Special Support Fund for Non-State Owned Enterprises	Grant
13	Venture Investment Fund of Hi-Tech Industry	Grant
14	Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment	Grant
15	Grant for key enterprises in equipment manufacturing industry of Zhongshan	Grant
16	Water Conservancy Fund Deduction	Grant
17	Anti-Dumping Respondent assistance	Grant
18	Technology Project assistance	Grant
20	Environmental Protection Grant	Grant
21	High and New Technology Grant	Grant
22	Independent Innovation and High-Tech Industrialisation Program	Grant
23	Environmental Prize	Grant
24	Provincial emerging industry and key industry development special fund	Grant
25	Environmental Protection Fund	Grant
26	Intellectual Property licensing	Grant

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Program Number	Program Name	Program Type
27	Financial resources construction special fund	Grant
28	Reducing pollution discharging and environmental improvement assessment award	Grant
29	Comprehensive utilisation of resources – VAT refund upon collection	Tariff & VAT
30	Grant of elimination of out dated capacity	Grant
31	Grant from Technology Bureau	Grant
34	Patent Award of Guangdong Province	Grant
35	Wuxing District Freight Assistance	Grant
36	Huzhou City Public Listing Grant	Grant
37	Huzhou City Quality Award	Grant
38	Huzhou Industry Enterprise Transformation & Upgrade Development Fund	Grant
39	Wuxing District Public List Grant	Grant
40	Transformation technique grant for rolling machine	Grant
41	Grant for Industrial enterprise energy management - centre construction demonstration project Year 2009	Grant
42	Key industry revitalization infrastructure spending in 2010	Grant
43	Jinzhou District Research and Development Assistance Program	Grant
47	Preferential loans and interest rates	Preferential Loans
48	International trade increase project fund	Grant
49	Industrial economy reform and development fund	Grant
50	Sales revenue increase award	Grant
51	Tax contribution award	Grant
52	Energy and recyclable economy program	Grant
53	National controlled essential pollutant source supervision system third party operation and maintenance subsidy program	Grant
54	Scientific program awards in high and new scientific zone	Grant

I-1 General

- Complete the worksheet named “I-1 Company turnover”.
 - This worksheet is a table of the total company revenue over the period and split into:
 - Total revenue for Australian sales, domestic sales and third country sales
 - Revenue of the goods for Australian sales, domestic sales and third country sales
 - You must provide this table in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

RESPONSE:

Please refer to [Attachment I-1 Company turnover](#).

I-2 Preferential tax policies (Programs 3–5)

1. Complete the worksheet named “I-2 Income Tax”.
 - This worksheet is a table of your company’s income tax liability over the last three financial years.
 - You must provide this table in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

RESPONSE:

Please refer to [Attachment I-2.1 Income tax.](#)

2. Provide a copy of your company’s annual tax return for the last three financial years. If the documents are not in English, please provide a translation of the documents.

RESPONSE:

Please refer to [Attachment I-2.2 Annual tax return.](#)

3. Provide proof of your company’s tax payments to your tax authority over the last three financial years, including any progress payments made and related forms submitted to reconcile the annual tax return.

RESPONSE:

Please refer to [Attachment I-2.3 Tax payments.](#)

4. What is the general tax rate for enterprises (also referred to as the company or corporate tax rate) during the previous two financial years?

RESPONSE:

The general tax rate for enterprises during the previous two financial years is 25%.

5. Did your company pay less than the general tax rate for enterprises referred to in question I-2.4?

RESPONSE:

Yes, Iraeta pays less than the general tax rate for enterprises.

If yes:

- a. What tax rate did your company pay?
Iraeta pays income tax at the rate of 15%.
- b. Was the reduction in the tax paid or payable related to any of the preferential income tax programs in the table at the top of Section I Countervailing above?

Yes, it is Program 3, preferential Tax Policies for High and New Technology Enterprises.

- c. What is the name of the program?
Preferential Tax Policies for High and New Technology Enterprises.
- d. What is the name of the authority granting your company the reduced tax rate?
The granting authority are:

- 1) **Shandong Science and Technology Department**
- 2) **Shandong Provincial Department of Finance**
- 3) **Shandong Provincial State Taxation Bureau**
- 4) **Shandong Provincial Local Taxation Bureau**

- e. What is the eligibility criteria to benefit from the reduced tax rate?

The general criteria are as follows:

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1. The company has been funded over 12 months;
 2. The company has intellectual property;
 3. The said intellectual property contributes to more than 50% of the company's total revenue.
- f. Provide details of the application process
- The application process is as follows:**
1. File application documents,
 2. Get assessment by relevant departments,
 3. Relevant departments would announce the qualified applicants,
 4. Relevant departments awarded enterprise certificates
- g. Provide a copy of the blank application form. If the documents are not in English, please provide a translation of the documents.
- Not available, the application form is not publicly disclosed.**
- h. Provide a copy of your company's completed application form, including all Attachments to the application form. If the documents are not in English, please provide a translation of the documents.
- Not available, the completed applicable form of Iraeta has been filed to the relevant departments.**
- i. Provide a copy of any confirmation or other correspondence from the authority approving your company for the reduction in tax rate. If the documents are not in English, please provide a translation of the documents.
- Please refer to [Attachment I-2.5 Certification of High and New Technology Enterprises](#).**
- j. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.
- No, neither fees nor expenses incurred to apply for High and New Technology Enterprises.**

I-3 Financial grants (Programs 7–18, 20-28, 30–43 and 48–54)

1. Complete the worksheet named "I-3 Grants".
 - This worksheet is a table of the grants received by company over the period plus the two preceding years.
 - You must provide this table in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

RESPONSE:

Please refer to [Attachment I-3.1 Grants](#).
2. Provide a copy of your company's non-operating income and/or other business income ledgers, extracted directly from your accounting system, for the period covering the period plus the 2 preceding years.

RESPONSE:

Please refer to [Attachment I-3.2 Non-operating income ledger](#).
3. Did your company receive any grants (or any other financial contribution) from any level of government during the period plus the two preceding years?

RESPONSE:

Yes, Iraeta received grants during the period plus the two preceding years.

If yes:

- a. Were any of the grants related to any program listed in the table at the top of Section I above? If yes, identify the program.

No, none of the grants received by Iraeta is related to the program listed in the table at the top of Section I.

- b. Were any of the grants related to programs not listed in the table at the top of Section I above? If yes, provide the names of the programs.

Yes, for the names of the programs, please refer to [Attachment I-3.1](#).

4. For each of the grants listed in I-3.3:
 - a. What is the name of the grant?
 - b. What is the name of the authority providing the grant?
 - c. What is the eligibility criteria to receive the grant?
 - d. Is the grant directly related to the goods under consideration, export sales to Australia and/or export sales generally?
 - e. Provide details of the application process.
 - f. Provide a copy of the blank application form. If the documents are not in English, please provide a translation of the documents.
 - g. Provide a copy of your company's completed application form, including all Attachments to the application form. If the documents are not in English, please provide a translation of the documents.
 - h. Provide a copy of any confirmation or other correspondence from the authority approving the grant. If the documents are not in English, please provide a translation of the documents.
 - i. Provide proof of payment of your company receiving the grant (e.g. bank statements).
 - j. Provide a copy of the accounting journal entries relating to the grant.
 - k. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the grant.

RESPONSE:

Please refer to [Attachment I-3.4 Financial grants](#).

I-4 Tariff and VAT Exemptions (Programs 6 and 29)

RESPONSE:

Not applicable, as Iraeta has no imported machinery/equipment or any purchases which were subject to VAT exemptions.

Complete the worksheet named "I-4 Tariff and VAT".

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

1. Provide complete details involving the amount of the VAT refund received, including whether the refund was received in a lump sum or multiple instalments.
2. Describe the application and approval procedures for obtaining a benefit under the program.
3. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the GOC in relation to the program.

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4. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.
5. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
6. State whether your eligibility for the program was conditional on one or more of the following criteria:
 - a) whether or not your business exports or has increased its exports;
 - b) the use of domestic rather than imported inputs;
 - c) the industry to which your business belongs; or
 - d) the region in which your business is located.
7. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
8. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.
9. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.
10. To your knowledge, does the program still operate or has it been terminated?
11. If the program has been terminated, please provide details (when, why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?
12. If the program terminated has been substituted for by another program, identify the program.
13. Were the materials and/or equipment that were entitled to a refund of VAT used in the production of the goods during the period? If yes, provide the following information:
 - (a) type of inputs;
 - (b) cost of inputs;
 - (c) quantity of inputs; and
 - (d) amount of VAT refunded.
14. Has your company received exemption from payment of or refunds of import duty and import VAT for imported material inputs at any time that were used in the production of the goods during the period? If yes, provide the following information:
 - (a) description of imported product;
 - (b) country of origin;
 - (c) quantity of imported product;
 - (d) purchase price;
 - (e) terms of purchase (e.g. FOB, CIF);
 - (f) ocean freight;
 - (g) value for duty of imported product;
 - (h) regular rate of taxes and duties;
 - (i) concessionary rate of taxes and duties;
 - (j) amount of duties and taxes normally applicable;
 - (k) amount of duties and taxes paid;
 - (l) amount of duties and taxes exempt;
 - (m) date of importation;
 - (n) tariff classification number;
 - (o) customs entry number; and
 - (p) application fee.

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15. Explain if (and how) the GOC determines which imported inputs are consumed by your business in the production of the subject goods and in what amounts, and the amount of duty paid or payable on the inputs (including any allowance for waste).

16. Explain how the GOC determined the percentage rate of duty exemption.

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

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

17. Provide a representative sample of copies of import entry documents (for example: bill of entry, invoice from supplier, etc.) for each type of importation covering duty-exempt inputs and duty-paid inputs imported for use in the manufacturing of the subject goods.

18. In addition to the import entry documents, also provide copies, if applicable, of any applications submitted to and/or approval document received from the GOC relating to the exemption from the payment of import duty and import VAT on imported inputs and in relation to the VAT that is refunded on the exportation of the subject goods.

19. Provide copies of reports and audits by the GOC authority responsible for administering the duty rebate or duty drawback scheme with respect to the verification of the importation and use of inputs and the remittance or drawback of the related duty paid or payable.

I-5 Preferential Loans and Interest Rates (Program 47)

RESPONSE:

Not applicable, Iraeta does not receive any preferential loans. All loans include rates of interest which substantially exceed the prevailing benchmark rate in China.

Complete the worksheet named "I-5 Loans".

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

1. Provide a general overview of how your company secures necessary financial resources on the financial market (e.g. Loans, issuance of bonds etc.)
2. Provide a list of all the loans provided to your company from banks and financial institutions which have not been fully reimbursed by the end of the period.
3. Provide specific details of the loan, including the start date of the loan, the principal amount of the loan, terms and conditions of the loan, purpose of the loan, the repayment terms/frequency, repayment amount, interest rate, interest type (e.g. fixed, variable etc.), if the loan has been redrawn any time during its duration, please provide the redraw date, amount redrawn and the reason for redraw.
4. Indicate whether each bank is Chinese or foreign-owned and give the percentage of government ownership of each bank (including ownership by entities owned or controlled by a government).
5. In the case of each loan from government-owned or controlled, please explain the reason for borrowing from such a bank rather than a commercial bank. What are the differences in the terms and conditions of loans between the government and commercial banks?
6. Explain how the decisions to grant the loan or its conditions are dependent on the purpose of the loan and give details on the process your company went through to apply for the loan. Please provide detail on what conditions or criteria your company needed to fulfil to be granted the loan.

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7. For each of the loans listed, provide copies of signed loan agreements between the bank which provided the loan and company which was the addressee of the loan specifying the conditions of the loan such as amount, term of repayment, interest rate etc. Also provide a copy of your application for the loan.

*Note: If your company has more than one loan from the same bank/financial institution which were not repaid by the end of the period and the loan agreements for these loans are standardised, it is sufficient **at this stage** to provide an English translation for one of them only (e.g. If your company has multiple loans from one particular bank which only differ in amounts you only need to translate one of them into English for your questionnaire response. However it is necessary to translate all credit line agreements from which loans not repaid by the end of the period were drawn.*

8. Please explain whether the granting of the specific loan depended on the link between the purpose of the loan and the goals specified in any government plan or development program. Provide a copy of the laws, regulations, administrative guidelines and any other acts relevant for the operation of this lending with any subsequent amendments. Also include a copy of any governmental or development plan of which the scheme represents a direct implementation.
9. For each loan application, please explain the involvement of third parties such as government departments, local councils, party committees in the whole process since the application for the loan up to the decision whether the loan is granted or not.
10. In the “Loans” spreadsheet, provide the information requested on guarantees for the loans provided to your company.
11. Please give details of all loan applications during the period which were refused; give the name of the bank, the amount of the loan requested and the reasons for refusal.
12. Provide any other information you may deem necessary for the Commission to make an assessment on the subsidisation of producers/exporters of the product under investigation. You may adjust the table in the “Loans” tab as necessary to include this additional information.

I-6 Other Programs

RESPONSE:

Not applicable, all programs have been identified and reported as instructed. There is no other program. Therefore, the questions in this section is not applicable.

1. Provide a list of all the provinces in which you have business operations (including locations of factories, sales offices, or other places of business).
2. Are you aware of any programs — of the GOC, any of its agencies or any other authorised body — that benefits manufacturers of the goods that have not been accounted for in this questionnaire? Provide the name of those programs you are aware of (even if your company is not eligible to receive benefit under the program.)
3. Indicate the location of the program by region, province or municipal level.
4. Indicate the type of program, for example:
 - the provision of grants, awards or prizes;
 - the provision of goods or services at a reduced price (e.g. electricity, gas, transport);
 - the reduction of tax payable including income tax and VAT;
 - reduction in land use fees;
 - loans from Policy Banks at below-market rates; or
 - any other form of assistance.

For **each program** that you have identified, answer the following.

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5. Indicate whether your company benefited from any of the listed programs during the period.
6. Indicate which goods you produced that benefited from the program (e.g. the program may have benefited all production or only certain products that have undergone research and development).
7. Describe the application and approval procedures for obtaining a benefit under the program.
8. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the GOC in relation to the program.
9. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.
10. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
11. State whether your eligibility for the program was conditional on one or more of the following criteria:
 - a) whether or not your business exports or has increased its exports;
 - b) the use of domestic rather than imported inputs;
 - c) the industry to which your business belongs; or
 - d) the region in which your business is located.
12. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
13. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.
14. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.
15. To your knowledge, does the program still operate or has it been terminated?
16. If the program has been terminated, please provide details (including when and why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?

If the program terminated has been substituted for by another program, identify the program and answer all the questions in this part in relation to this programme.

EXPORTER'S DECLARATION

I hereby declare that Iraeta Energy Equipment Co., Ltd., 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 : Ms Lui Li

Signature : *Lui Li*

Position in Company : Export manager

Company :

Date : August 23rd 2019

伊莱特能源装备股份有限公司
Iraeta Energy
Equipment Co., Ltd.