



Exporter Questionnaire



CHANGSHU LONGTE GRINDING BALL CO., LTD.

Changshu Longte Grinding Ball Co., Ltd

Case number: 520
Product: Certain grinding balls
From: People's Republic of China (China)
Review period: 1 July 2018 to 30 June 2019 (the period)
Response due by: 28 August 2019

Extended to 11 September 2019

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CHECKLIST

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

Section	Please tick if you have responded to all questions
Section A – Company information	<input checked="" type="checkbox"/>
Section B – Export sales to Australia	<input checked="" type="checkbox"/>
Section C – Exported goods and like goods	<input checked="" type="checkbox"/>
Section D – Domestic sales	<input checked="" type="checkbox"/>
Section E – Due allowance	<input checked="" type="checkbox"/>
Section F – Third country sales	<input checked="" type="checkbox"/>
Section G – Cost to make and sell	<input checked="" type="checkbox"/>
Section H – Particular market situation	<input checked="" type="checkbox"/>
Section I - Countervailing	N/A
Exporter's declaration	<input checked="" type="checkbox"/>
Non-confidential version of this response	<input checked="" type="checkbox"/>

Attachments	Please tick if you have provided spreadsheet
B-2 Australian sales	<input checked="" type="checkbox"/>
B-4 Upwards sales	<input checked="" type="checkbox"/>
B-5 Upwards selling expenses	<input checked="" type="checkbox"/>
D-2 Domestic sales	<input checked="" type="checkbox"/>
F-2 Third country sales	<input checked="" type="checkbox"/>
G-3 Domestic CTM	<input checked="" type="checkbox"/>
G-4.1 SG&A listing	<input checked="" type="checkbox"/>
G-4.2 Dom SG&A calculation	<input checked="" type="checkbox"/>
G-5 Australian CTM	<input checked="" type="checkbox"/>
G-7.2 Raw material CTM	<input checked="" type="checkbox"/>
G-7.4 Raw material purchases	<input checked="" type="checkbox"/>
G-8 Upwards costs	<input checked="" type="checkbox"/>
G-9 Capacity utilisation	<input checked="" type="checkbox"/>
I-1 Company turnover	N/A
I-2 Income tax	N/A
I-3 Grants	N/A
I-4 Tariff and VAT	N/A
I-5 Preferential loans	N/A

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

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.

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practicable, but no later than the time this questionnaire is due, otherwise the response may be deemed deficient.

SECTION A COMPANY INFORMATION

A-1 Company representative and location

1. Please nominate a contact person within your company:

Name	Ms. Chen Jie
Position in the company	Export Manager
Telephone	[CONFIDENTIAL TEXT DELETED]
E-mail address	[CONFIDENTIAL TEXT DELETED]

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

Name	Charles Zhan Senior Associate, Moulis Legal
Address	6/2 Brindabella Circuit Brindabella Business Park Canberra International Airport Australian Capital Territory Australia 2609
Telephone	+ 61 2 6163 1000
Email address of contact person	charles.zhan@moulislegal.com
All communications in relation to this matter should be directed to Moulis Legal in the first instance.	

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.

The company's financial records are held at its office address, being No.118 Hualian Rd, Tonggang Industry, Meili Town, Changshu City, Jiangsu Province, China.
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4. Please provide the location of the where the company's production records are held.

Same as above.

A-2 Company information

1. What is the legal name of your business?

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[CONFIDENTIAL TEXT DELETED – commercial arrangement of affiliated companies in relation to the production and sales of the goods] The Minister considered it appropriate to treat these entities as a single economic entity for the purpose of determining variable factors and resultant dumping margin.

Because the producers of the goods under the JV arrangement are [CONFIDENTIAL TEXT DELETED – commercial arrangement of Longte and ME Longteng JV] this Exporter Questionnaire is mostly to be found in the financial records of Longte. It is from those records that the information reported in this EQ has mostly been drawn. Relevant information from other parts of the single economic entity is also provided, where applicable, in order to ensure that fully absorbed, comprehensive and accurate cost information pertaining to the goods under consideration is reported to the Commission.

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

Longte trades under its own name for its own production of the goods in the domestic and export market.

The goods produced by the ME Longteng JV for the Australian export market are sold to Australia via ME.

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

Not applicable.

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

[CONFIDENTIAL TEXT DELETED – confidential corporate management information]

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

Please refer to Attachment A-2.5 [CONFIDENTIAL ATTACHMENT] for a diagram showing the ownership structure and the list of all related companies and its functions thereof.

6. Is your company or parent company publicly listed?
- If yes, please provide:
- (a) the stock exchange where it is listed; and

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(b) any principal shareholders³

If no, please provide

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

Longte and its parent company are not public listed. Please refer to Attachment A-2.5 for shareholding information of Longte.

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.

Longte is a limited liability company specialising in the production and sale of grinding media both in the domestic and export markets.

Consistent with the situation established in the original investigation, [CONFIDENTIAL TEXT DELETED – commercial arrangement of Longte and ME Longteng JV].

Longte's parent company Longteng is an integrated steel producer which produces and sells a large range specialised steel products, including steel billet and round bar (including grinding bar). Grinding bar is the key material input for grinding ball production. During the POR Longteng supplied most of this grinding bar for Longte and ME Longteng's production of grinding balls.

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.

Longte performed all of the functions listed above.

9. Provide your company's internal organisation chart.

Please refer to Attachment A-2.9 [CONFIDENTIAL ATTACHMENT] for Longte's internal organisation chart.

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

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.

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Please refer to Attachment A-2.9, which is self-explanatory.

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

Please refer to Attachment A-2.11 [CONFIDENTIAL ATTACHMENT] for Longteng Group's product brochure relating to grinding media.

A-3 General accounting information

1. What is your financial accounting period?

The accounting period of Longte is from 1 January to 31 December.

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

Longte's financial accounts are audited. The auditor is Suzhou Hengan Accounting Firm.

3. What currency are your accounts kept in?

Longte accounts are kept in Chinese Yuan.

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

The financial system used by Longte during the review period ("POR") is [CONFIDENTIAL TEXT DELETED – financial system].

5. What is the name of your sales system?

Longte used [CONFIDENTIAL TEXT DELETED – financial system]. as its sales system as well.

6. What is the name of your production system?

The production system used by Longte during the POR is also the [CONFIDENTIAL TEXT DELETED – financial 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.

As identified above, Longte uses [CONFIDENTIAL TEXT DELETED – financial system] as its integrated financial accounting, sales and production system.

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

Longte's accounting practice complies with the generally accepted accounting principles 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.

Longte has not changed its accounting methods during 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.

Please refer to Attachment A-4.1 [CONFIDENTIAL ATTACHMENT] for Longte's 2017 and 2018 audited financial reports.

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.

Not applicable.

Please refer to Attachment A-4.1 for Longte's audited financial report of 2017 and 2018.

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.

Longte did not maintain different profit centres in its accounts during the POR.

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.

Please refer to Attachment A-4.4 [CONFIDENTIAL ATTACHMENT] for income statements extracted directly from Longte's accounting system covering the most

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recent financial period of 2018 and the half yearly income statements covering the period.

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

Please refer to Attachment A-4.5 [CONFIDENTIAL ATTACHMENT] for Longte's trial balance covering the period and the most recent financial year, being 2018.

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

Please refer to Attachment A-4.6 [CONFIDENTIAL ATTACHMENT] for Longte's 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

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

The situation is the same as that as was presented and verified in the original investigation.

The Australian sales of the goods during the POR can be broadly classified into two categories.

The first category involves the production of the goods in Longte's facility, which were then sold by Longte directly to its unaffiliated Australian customers.

[CONFIDENTIAL TEXT DELETED – commercial arrangement in relation to Australian sales].

Once Longte receives a purchase order from the customer, it then arranges production at its own facility. After production is completed, Longte issues the relevant commercial invoices and arranges for the goods to be delivered based on the agreed shipping terms. During the POR, a mixture of [CONFIDENTIAL TEXT DELETED – shipping term] terms were used for these types of sales. Commercial invoices are issued after production is completed and payment is collected at the commercial invoice value according to the sales terms.

The second category relates to the goods produced in ME Longteng's facility. For these sales, ME Longteng produces the goods on a toll processing basis, and the goods are supplied, under the JV arrangements (joint activity of Longte and ME). [CONFIDENTIAL TEXT DELETED – commercial arrangement in relation to Australian sales].

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;

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- (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?

All Australian sales are made in [CONFIDENTIAL TEXT DELETED – currency].

[CONFIDENTIAL TEXT DELETED – payment arrangement]. Forward contracts were not used to lock in the foreign exchange rate relating to the export sales. Longte’s accounting system adopts the exchange rate published by the People’s Bank of China prevailing on the first day of each month.

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.

None of the Australian customers are related to Longte or ME Longteng.

For the ME Longteng sales, as described above at B-1.1, [CONFIDENTIAL TEXT DELETED – commercial arrangement of Longte and ME Longteng JV].

The pricing formula is different to the original investigation, to account for the increasingly integrated nature of grinding ball production under the JV, using mostly the grinding bar produced and supplied by Longteng.

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

As advised in B-1.1 prices are negotiated with each customer in Australia individually. For example, please see:

[CONFIDENTIAL TEXT DELETED – Australian sales details].

at Attachment B-1.4 [CONFIDENTIAL ATTACHMENT]

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.

[CONFIDENTIAL TEXT DELETED – commercial arrangement in relation to Australian sales].

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

Longte did not provide such discounts or rebates in relation to the Australian sales of the goods during the POR.

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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.

Longte did not issue such credit or debit notes in relation to the Australian sales of the goods during the POR.

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?

Longte reported the Australian sales based on the date of the commercial invoice.

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.

Please refer to the worksheet Attachment B-2 Australian sales [CONFIDENTIAL ATTACHMENT] for all goods invoiced during the POR. As with the original investigation, for exports of the goods under the ME Longteng JV agreement, additional information is provided based on the purchase order entered with the Australian customer and the direct expenses incurred by ME.

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

Longte prepared the Australian sales listing based on information from the integrated financial system, and the relevant commercial invoices issued during the review period. Expenses are reported based on actual charges by the service providers on a transaction by transaction basis. [CONFIDENTIAL TEXT DELETED – explanation of confidential spreadsheet].

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.

Please refer to Attachment B-3.1 [CONFIDENTIAL ATTACHMENT] for two sets of Australian sales documentation, which are the two largest invoices by value. CONFIDENTIAL TEXT DELETED – explanation of confidential attachment information]

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.

Longte has annotated the selected documents for the convenience of review where necessary.

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.

Please refer to Attachment B-4 Upwards sales. [CONFIDENTIAL ATTACHMENT]

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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.

Please refer to Attachment B-4 Upwards 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.

Please refer to Attachment B-4 Upwards sales.

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.

Please refer to the worksheet B-5 Upwards selling expense [CONFIDENTIAL ATTACHMENT]

2. Please provide all documents, other than those in A-4, B-2 and D-2, required to complete the “B-5 Upwards selling expense” worksheet. If the documents include spreadsheets, all formulas used must be retained.
3. For any amount in the “B-5 Upwards selling expense” 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 C of the worksheet; and
 - highlight or annotate the amount shown in the source document.

Please refer to the worksheet B-5 Upwards selling expense

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.

The goods exported to Australia during the POR were ferrous grinding ball, containing alloy, forged, with diameters in the range of 20mm to 125mm. A product brochure is provided in Attachment A-2.11. Additional technical information such as internal product model code is provided within Attachment B-2 Australian sales spreadsheet.

Whilst all of the goods exported to Australia during the POR are in the broad “forged” ball category, Longte classifies its forging production method further into subcategories of “hot rolled” and “forged”. To be consistent with Longte’s sales and production record, Longte has identified the “production method” category of its goods by using its more detailed classifications.

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

MCCs of the goods exported to Australia during the POR in the B-2 Australian sales listing, according to the Commission’s proposed MCC structure are the following. As mentioned above, Longte has adopted an additional “production method” subcategory to identify forged grinding balls which are “hot rolled”.

Item	Category	Sub-category	Identifier
1	Production method	Forged	F
2	Diameter	Diameter in mm	20mm to 125mm
3	Product code	Internal grade/model	LTB2, LTB3, LTBU

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.

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The goods sold on the domestic market were ferrous grinding ball, containing alloy, forged or hot-rolled, with diameters in the range of 20mm to 140mm.

- 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.

MCCs of the goods exported to Australia during the POR in the D-2 Domestic sales listing, according to the Commission’s proposed MCC structure are the following. As mentioned above, Longte has adopted an additional “production method” subcategory to identify forged grinding balls which are “hot rolled”.

Item	Category	Sub-category	Identifier
1	Production method	Forged	F
2	Diameter	Diameter in mm	20mm to 140mm
3	Product code	Internal grade/model	LTB2, LTB3, LTB3-2, LTB6, LTB6-1

C-3 Internal product codes

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

If yes:

- (a) Provide details of the product or SKU coding system for the goods, such as a legend or key of the meaning for each code within the product or SKU code.
- (b) Provide details on how you mapped the product or SKU codes to the MCC for the purpose of completing this questionnaire.
- (c) Provide a table of showing the product or SKU codes for each MCC.

If no:

- (a) Provide details on the method used to identify the MCC in the sales and cost spreadsheets.

Longte’s products are identified based on the method of production, diameter and the grade/model code, which is consistent with the MCC structure. Longte identified the MCC in the sales and cost spreadsheet based on its existing product identification. The grade code adopted by Longte, such as “LTB2”, refers to the steel grade.

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

Different to the Australian sales, which are handled by both Longte and ME depending upon the production facilities involved, domestic sales of grinding balls were handled by Longte only.

Generally speaking, all goods sold on the domestic market during the POR were produced in Longte's own production facility. [CONFIDENTIAL TEXT DELETED – commercial arrangement relating to domestic sales].

Domestic sales are negotiated with customers on a transaction by transaction basis. Prices are negotiated taking into account cost of production and market conditions. The customer will then place its purchase order directly with Longte for Longte to arrange for production. Invoices are issued and payment is fully collected before delivery in most cases.

Delivery terms are either collect from factory or delivered.

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.

No.

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

Domestic sales are negotiated on a transaction by transaction basis and not made in accordance with price list.

Longte issues price guidances its domestic sales team. Such guidances are not provided to customers. They are only for the purpose of internally communicating

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opinions of prices and market trends.

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.

[CONFIDENTIAL TEXT DELETED – pricing policy]

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.

No, Longte did not provide on-invoice discounts or off-invoice rebates to customers or their associates in relation to the sale of the like goods during the POR.

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.

No, Longte did not issue any credit or debit notes (directly or indirectly) to customers or their associates in relation to the sale of the like goods during the POR.

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

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

Longte reported domestic sales based on the invoice date.

D-2 Domestic sales listing

1. Complete the worksheet named “D-2 Domestic sales”
 - This worksheet lists all domestic sales (i.e. transaction by transaction) of like goods invoiced within the period, even if they are models not exported to Australia
 - If you have claimed in 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.

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Please refer to the worksheet **Attachment D-2 Domestic sales [CONFIDENTIAL ATTACHMENT]** for all Longte's domestic sales of like goods invoiced within the POR.

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

The data for each column in **Attachment D-2** was directly generated from Longte's sales accounting system.

D-3 Sample domestic sales documents

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

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

Please refer to **Attachment D-3.1 [CONFIDENTIAL ATTACHMENT]** for two sets of domestic sales sample documents, which are the two largest invoices by value.

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

Longte has annotated the selected documents for the convenience of review.

D-4 Reconciliation of sales to financial accounts

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

Answers to the following questions in section D-4 are included in the answers to the questions in section B-4. Please refer to the answers to section B-4 for details.

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.

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- Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Please provide all documents, other than those in A-4, D-2 and F-2, required to complete the “B-4 Upwards sales” worksheet. If the documents include spreadsheets, all formulas used must be retained.
 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.

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?

Domestic sales were generally made on [CONFIDENTIAL TEXT DELETED – payment term].

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?

Various credit terms were used for different Australian customers. Longte calculated the credit terms for the Australian sales based on the average accounts receivable turnover for each customer, and reported under the column "Payment

terms (days)". [CONFIDENTIAL TEXT DELETED – commercial arrangement relating to Australian sales]

E-2 Packaging

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

Bags are generally used for packaging of domestic sales of like goods. Drums are also used if required by the customer.

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

Same as domestic sales.

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

There are no distinct differences in packaging between Longte'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?

[CONFIDENTIAL TEXT DELETED – commercial arrangement relating to domestic sales]. The transportation costs are calculated in the domestic sales listing in Attachment D-2 based on the unit transportation price charged by the service provider.

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

As identified in Attachment B-1 above, a mixture of delivery terms were used in relation to Australian sales. These are identified for each transaction in the Attachment B-2 Australian sales spreadsheet.

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?

Such expenses are reported based on the actual costs incurred.

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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?

Such expenses are reported based on the actual costs incurred.

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?

Such expenses are reported based on the actual costs incurred.

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?

Such expenses are reported based on the actual costs incurred.

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.

No.

2. Are there any differences in tax liability between domestic and export sales? If yes, provide details, for example:

- What is the rate of value-added tax (VAT) on sales of the goods and like goods?
- How is VAT accounted for in your records in relation to sales of the goods and like goods?
- Do you receive a VAT refund in relation to sales of the goods and/or like goods?
- Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?

VAT is applicable for domestic sales of the goods and like goods and a VAT refund is received in relation to export sales of the goods and like goods. Please refer to Attachment E-4 for rate of VAT and VAT refund to the POR.

Longte did not receive any remission or drawback of import duties during the POR.

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

No, there are no other direct selling expenses incurred by Longte in relation to domestic sales of like goods.

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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

No, there are no other direct selling expenses incurred by Longte in relation to export sales of the goods to Australia.

The relevant direct selling expenses as incurred by ME in relation to the ME Longteng JV exports are reported under B-2 Australian sales spreadsheet.

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.

Longte has not identified any other required adjustments at this stage.

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.

Longte's third country sales process is the same as that of Australia.

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.

[CONFIDENTIAL TEXT DELTED – commercial arrangement relating to third country sales].

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?

Longte reported third country sales based on the commercial invoice date.

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.

Please refer to the worksheet Attachment F-2 Third country sales. [CONFIDENTIAL ATTACHMENT]

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

Please refer to the worksheet "4. Third country sales_all goods" in Attachment B-4 Source documents for upwards sales for the source of "F-2 Third country sales". This has been directly generated from detailed exportation records kept by Longte's export department.

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.

The prices of goods sold into different markets are differently impacted by the conditions of competition in the markets concerned.

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.

Please refer to the Attachment A-2.11 product brochure for the production process. The production process at ME Longteng is similar to that of Longte. The production facilities Longte are only used to manufacture the GUC. ME Longteng produces both grinding balls and grinding rods. All scraps generated from Longte and ME Longteng's production processes were sold to Longteng based on market value and are re-used in Longteng's steel production.

Scrap steel generated by Longteng's production of grinding bar is re-used by Longteng itself. By-product in the form of blast furnace gas generated by Longteng's integrated production of grinding bar is supplied to Longte based on a fixed transfer price.

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.

Yes. Longteng supplied most ([CONFIDENTIAL]%) of the grinding bar used in the production of the goods by Longte and ME Longteng during the POR.

G-2. Cost accounting practices

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

Longte's cost accounting system is based on actual costs.

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.

Not applicable, since Longte's cost accounting system is based on actual costs.

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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.

No.

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

[CONFIDENTIAL TEXT DELTED – cost accounting practice]

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

No.

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.

No, Longte did not engage in any start-up operations in relation to the GUC. Longte engaged in minor start-up operation during March 2019, in the form of adding new production equipment, which increased total production capacity.

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)?

Raw materials and finished goods inventories are valued on the weighted average basis. Work-in-process is not measured by Longte.

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

The value for damaged or sub-standard goods generated at the various stages of production is separately booked as "scrap" which is sold at market value. The cost of scrap is valued on actual basis. [CONFIDENTIAL TEXT DELTED – treatment of sub-standard goods]

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

There are no by-products or joint products generated from the production process of grinding ball. The scraps are also valued on actual basis.

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

No management fees or corporate allocations are charged to Longte by its parent company Longteng.

G-3 Cost to make on domestic market

1. Complete the worksheet named "G-3 Domestic CTM".
 - This worksheet lists the quarterly cost to make the domestic models of like goods by MCC manufactured within the period, even if they are models not exported to Australia.
 - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
 - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture like goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
 - If you have claimed in 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.

Please refer to the worksheet Attachment G-3 Domestic CTM [CONFIDENTIAL ATTACHMENT] as requested.

[CONFIDENTIAL TEXT DELTED – information pertaining to confidential attachment]

2. Provide a table listing the source of the data for each column of the "G-3 Domestic CTM" listing.

Data for each column of Attachment G-3 was prepared based on monthly CTM data of grinding balls, which is directly generated from the accounting system. The relevant source documents are provided as part of the response to question G-8.2.

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.

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Please refer to the worksheet Attachment G-4.1 SG&A listing. [CONFIDENTIAL ATTACHMENT]

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.

Please refer to the worksheet Attachment G-4.2 Domestic SG&A calculation [CONFIDENTIAL ATTACHMENT] which has been prepared in strict compliance with the above instructions.

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.

Please refer to the worksheet Attachment G-5 Australian CTM [CONFIDENTIAL ATTACHMENT] as requested. [CONFIDENTIAL TEXT DELETED – information pertaining to confidential attachment]]

2. Provide a table listing the source of the data for each column of the "G-5 Australian CTM" listing.

Data for each column of the Attachment G-5 spreadsheet was prepared based on monthly CTM data of grinding balls, which is directly generated from the accounting system. The relevant source documents are provided as part of response to question G-8.2.

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

[CONFIDENTIAL TEXT DELETED – cost accounting policy]

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.

Please refer to Attachment G-6.2 Overhead allocation sample [CONFIDENTIAL ATTACHMENT] as required.

G-7 Major raw material costs

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

**The major raw material used for the production of the goods is steel grinding bar.
The major raw material used for the production of grinding bar is iron ore.**

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.

Longte purchased most of the grinding bar used for the production of the goods from its parent company Longteng. The grinding bar supplied by Longteng is produced as part of its integrated production.

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Longte provides the cost to make of grinding bar Longteng at Attachment G-7.2 Raw material CTM Longteng. [CONFIDENTIAL ATTACHMENT]

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.

Please refer to Attachment G-7.3 as required. [CONFIDENTIAL ATTACHMENT]

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.

Please refer to the worksheet Attachment G-7.4 Raw material purchases [CONFIDENTIAL ATTACHMENT] as requested. The purchase of iron ore by Longteng for the integrated production of grinding bar is also provided.

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

The source data for each column of the worksheet Attachment G-7.4 [CONFIDENTIAL ATTACHMENT] is the raw material inventory ledger of Longte and Longteng, respectively.

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.

Please refer to Attachment G-7.6 [CONFIDENTIAL ATTACHMENT] for two selected purchases for each raw material followed the above instructions.

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.

One of the suppliers in Attachment G-7.4 is related to Longte, namely its parent company Longteng. [CONFIDENTIAL TEXT DELETED – commercial arrangement]

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.

Please refer to **Attachment G-8 Upwards costs.** [CONFIDENTIAL ATTACHMENT]

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.

Please refer to **Attachment G-8.2.** [CONFIDENTIAL ATTACHMENT]

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.

Please refer to the worksheets at **Attachment G-8** and **Attachment G-8.2.**

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.

Please refer to the worksheet **Attachment G-9 Capacity Utilisation.** [CONFIDENTIAL ATTACHMENT]

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;

Longte is not required to report to the GOC in relation to its normal business operations. Longte is a private company and all its business decisions are made by the senior management of the company.

- (b) payment of taxes;

Longte pays taxes in accordance with the relevant laws of China. These are paid on a regular monthly or quarterly basis. Final tax liabilities are reconciled and paid at the end of each year as per Chinese legal requirements.

- (c) senior management representation within your business;

Longte is a wholly private-owned company. The GOC has no senior management representation within Longte's business. Senior management within the business are recruited from the employment market and are hired according to Chinese law and the company's operational procedures.

- (d) supervision by the State-owned Assets Supervision and Administration Commission (SASAC) or a body under the control of SASAC.

As stated above, Longte is a private company wholly in control and command of its operations. It is not supervised by SASAC or by any other body under the control of SASAC or the GOC.

- (e) approval/negotiation of business decisions (e.g. investment decisions, management decisions, pricing decisions, production decisions, sales decisions);

The GOC has nothing to do with Longte's business decisions. All Longte's business decisions are made and resolved by its executive director, senior management and/or general manager.

- (f) licensing;

Longte's only interaction with the GOC in this regard is the issuance of its business license. No other licensing is needed for the operational activities of the company.

- (g) restrictions on land use;

Longte faces no direction or restrictions from the GOC in its land usage apart from land zoning and development laws.

(h) provision of loans; or

Longte's loans are provided by commercial banks. The terms and conditions of Longte's borrowings are decided by commercial negotiation with its lenders.

(i) provision of grants, awards or other funds.

Longte did not receive any grants, awards or other funds during the review period.

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).

Longte is not a State-owned (SOE) or State-invested enterprise (SIE).

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

Article 50 of the Company Law of China provides as follows:

A limited liability company with comparatively few shareholders or comparatively small in scale may have one executive director instead of a board of directors. The executive director may concurrently serve as the manager of the company.

Longte is such a company, having only three shareholders, and therefore does not have a full board structure. [CONFIDENTIAL TEXT DELETED – private company information].

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

[CONFIDENTIAL TEXT DELETED – private company information]

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

Longte and its related companies' executive director and shareholders are not representatives or employees of, or otherwise affiliated with, the Government of

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China.

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

Longte and its related companies' executive director and shareholders are not representatives of or from the Chinese Communist Party (CCP).

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

Longte and its related companies' executive director and shareholders are not appointed, managed or recommended by the GOC.

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

Please refer to Attachment A-2.5 for Longte's shareholdings.

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

No changes in the ownership structure of Longte occurred during the period.

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

No persons appointed to positions within Longte are appointments by GOC authorities or designated to act on behalf of GOC authorities.

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.

There are no requirements of law or practice requiring or mandating government representation at any level of Longte's business.

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

FOR PUBLIC RECORD

Not applicable. Longte is not a publicly-traded company.

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

Not applicable.

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

Longte's executive director and general manager have the ability to reward, fire or discipline the senior managers at different levels.

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

Longte's senior managers do not hold positions in any GOC departments or organisations, associations or Chambers of Commerce.

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

Longte does not have a "pricing committee". Selling prices are negotiated taking into account costs of production and all relevant market factors.

H-3 Licensing

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

Please refer to Attachment H-3.1 [CONFIDENTIAL ATTACHMENT] for Longte's business license.

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

Longte's business license was issued by the Changshu City Market Supervision and Administration Bureau.

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

The procedures involved for any company to apply for a business license are as follows:

- (1) first, apply to reserve the proposed company name;**
- (2) second, a representative or agent of the shareholders applies to the registration authority for registration of the incorporation of the company; and**
- (3) third, all relevant documents as requested by laws and regulations, such as**

FOR PUBLIC RECORD

application form of registration of incorporation, articles of association, identity of each shareholder, and certificate of company residence etc., will be checked by the authority.

4. Describe any requirements or conditions that must be met in order to obtain the license(s).

Longte is a limited liability company. The requirements or conditions for incorporation of a limited liability company are as follows:

- (1) application for registration of establishment signed by the chairman of the board of directors or executive of the company;
- (2) certificate of representation by jointly entrusted agent by all the shareholders;
- (3) articles of association;
- (4) legal person qualification certificates of the shareholders or identity certificates of natural persons;
- (5) documents indicating the names and residence of the company's directors, supervisors and managers, and the certificates relating to their appointments, elections or engagements;
- (6) documents of tenure of office and identity certificate of the company's legal representative;
- (7) notification of pre-approval of the company's name; and
- (8) domicile certificate of the company.

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

There are no restrictions imposed on Longte by its business license. In relation to business scope, Article 12 of the Company Law provides as follows:

The scope of business of a company shall be specified in the articles of association of the company and shall be registered according to the law. A company may amend its articles of association and change the scope of business, provided that it shall carry out change registration.

Thus, companies in China apply for registration to carry out their requested business scope, and may change that business scope.

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

If a company acts outside the scope of the business license, the registration authority may, depending on the circumstances, issue a warning, impose a fine, confiscate illegal income, or order the suspension of business operations until the matter is rectified.

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

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Obtaining a business license is a standard aspect of company registration in China. A business license establishes that the company concerned is a legal person. In that capacity the company is able to operate legally and freely carry out its business.

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

The relevant Market Supervision and Administration Bureau (formerly the Administration for Industry and Commerce) who issued the business license to the company would be the competent authority to revoke it. Types of circumstances that could cause a business license to be revoked include:

- (1) dissolution after liquidation;**
- (2) having acquired the business license by falsification of the registered capital, and the circumstance is serious;**
- (4) having acquired the business license by false submissions or other fraudulent means, and the circumstance is serious;**
- (5) failure to commence business more than six months after incorporation without good reason, or ceasing business operations for more than six months consecutively after opening business;**
- (6) where the business scope of a company changes such that it exceeds the originally registered scope and the change to the scope has not been registered, and the circumstance is serious;**
- (7) failure to annually renew registration according to legal provisions and after the competent authority give a prescribed time limit, the company still fails to renew within the prescribed time limit;**
- (8) fraudulent behaviour relating to the licence, or allowing it to be used by unauthorised third parties, and the circumstance is serious; and**
- (9) engaging in serious illegal activities in the name of the company, such as might compromise the public interest.**

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.

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According to the Articles of Association of Longte, significant business decisions are proposed by the executive director and further approved by the board of shareholders. The general manager shall decide other decisions in the normal business operations in a commercial manner.

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

There is no GOC input, guidance or interference in the decision-making process regarding manufacturing, marketing and sale of steel products by Longte.

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.

No government departments/offices are involved, either directly or indirectly, in the manufacture, sale or purchase of steel products of Longte.

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

No reports need to be submitted to the GOC periodically by Longte apart from the required tax reporting to the State Administration of Taxation and annual renewal of registration and financial reporting to the State Administration of Industry and Commerce.

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.

Longte's business debt is funded via commercial loans from commercial banks. Longte has no awareness nor interest in any such Provincial or City Five Year Plans in Jiangsu or Changshu. Longte does not have copy 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 Government of China (including the National Development and Reform Commission).

Longte does not develop any five-year plans or similar planning documents. Longte does not have to submit any business planning documents to GOC authorities.

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

As stated above, Longte has an executive director in place rather than a board of directors. Thus, there are no Board of Directors meetings. No Board of Shareholders meetings were held during the period.

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

Longte does not have notes of company meetings where pricing decisions on steel products have been made. Longte's general and senior managers will consider costs of production and market conditions for the purposes of obtaining the best price in negotiations with customers and issue relevant guidances.

H-5 Financial and investment activities

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

Longte's business debt is funded via commercial loans from commercial banks. Longte and the bank mutually determine the terms and conditions of loans. For the major lenders, please refer to Attachment H-5.1. [CONFIDENTIAL ATTACHMENT]

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

The interest rates applicable to Longte's commercial loans are negotiated with commercial banks. The interest rates have varied over the past 5 years within the range of [CONFIDENTIAL TEXT DELETED]%.

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

Longte has not benefited from any concessional interest rates for loans/debts in the last five years.

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.

Longte has not 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 five years.

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

Longte has no such policies.

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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).

Longte has not invested in government or non-government debt securities.

H-6 Government policy on the industry

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

Longte has no awareness of such GOC opinions, directives, decrees, promulgations, measures, etc. concerning the goods that were put in place or operating during the investigation period.

2. Provide information concerning the name of any Government of China departments, bureaus or agencies responsible for the administration of all Government of China measures concerning the industry of the goods in the regions, provinces or special economic zones where your company is located, including contact information regarding the following areas:
- industrial policy and guidance on the industry;

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")
Address:	13 West Changan Street, Xicheng District, Beijing 100804
Phone number:	+86-10-6601 1228
Fax number:	+86-10-6601 1228

- market entry criteria for the industry;

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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”)
Address:	13 West Changan Street, Xicheng District, Beijing 100804
Phone number:	+86-10-6601 1228
Fax number:	+86-10-6601 1228

- environmental enforcement for the industry;

Department:	Ministry of Ecology and Environment of the People’s Republic of China
Address:	115 Small Nan Street, Xizhimen, Xicheng District, Beijing 100035
Phone number:	+86-10- 6655 6114
Fax number:	+86-10- 8466 5415

- management of land utilization;

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

- the China Banking Regulatory Commission for the industry;

Department:	China Banking Regulatory Commission (“CBRC”)
Address:	15 Financial Avenue, Xicheng District, Beijing 100800

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Phone number:	+86-10-6627 9378
Fax number:	+86-10-6629 9144

- investigation and inspection of expansion facilities;

To the best knowledge of Longte, there are no departments or sections in the Chinese government in charge of investigation and inspection of expansion facilities.

- the section in the National Development and Reform Commission that is responsible for the industry; and

As a local private company, Longte is not aware whether there is a functional division or section of the National Development and Reform Commission that is responsible for the steel industry, or how to contact any such division.

- import licensing for raw materials relating to the goods under consideration.

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?

As a local private company, Longte is not aware of the government’s industrial plans or policies at any level of government. Longte is not involved in or provided with any information for such plans or policies.

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

Longte has never provided any information relating to assessments of the implementation of plans, policies or measures.

5. Has the Government of China designated your company and/or industry as “pillar,” “encouraged,” “honourable,” or any other designation? If yes, please answer the following questions.
 - a. Explain the purpose of these designations, the criteria for receiving any such designation, and the benefits or obligations that arise from each such designation.

FOR PUBLIC RECORD

- b. Is there any connection between these designations and five-year plans or other industrial and/or economic policies or administrative measures?
- c. Describe any instances in which your company cited Government of China plans, policies, or measures as support for receiving the financing that you report.

Longte is not aware of it being designated with any of the above.

H-7 Taxation

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

No, there were no export taxes on the exports of the goods during the POR.

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

Please refer to Attachment E-4.2 for the value-added tax rebate/refund applicable to exports of the goods during the period.

3. Have there been any changes to the value-added tax rebate applicable to exports of the goods in the last 5 years? If yes, provide:

- a. a detailed chronological history of the value-added tax rebate rates;
- b. products affected;
- c. the effective dates of the rate changes;
- d. fully translated copies of any Government of China notices regarding these changes, including the relevant appendices.

The VAT rebate/refund for the goods varied during the last 5 years. Please refer to Attachment E-4.2 for these changes. A screenshot of the applicable VAT rebate rate changes from an Administration of Taxation website is attached at Attachment H-7.3 for the Commission's reference.

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

Longte is not aware of any tax changes being planned that would impact the industry at this stage.

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.

Longte's sales terms, prices and other contract provisions are decided by negotiation with customers and authorised by Longte's sales manager.

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

Longte's selling prices of grinding balls are determined by negotiation with customers with regard to the cost level of the company and market conditions. The GOC is not involved in the setting of selling prices nor does it have any guidance role of any sort.

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

Longte does not coordinate its selling prices or supply of the goods with other domestic producers or any Government of China departments. Longte is in vigorous competition with other producers in both its domestic and export markets.

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

Longte does not provide grinding ball price information or data to the Government of China, or other government officials or commercial/industry organisations, including those outside of China, which report on the industry.

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

Longte does not provide grinding ball price data to any persons at the provincial, regional or special economic zone level of government.

H-9 Industry associations

1. Is your business a member of any business or industry associations? If yes, explain your business' relationship with the association and the involvement of the Government of China with the associations.

No, Longte is not a member of any business or industry associations.

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

Not applicable because Longte is not a member of any business or industry associations.

H-10 Statistics submission/recording

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

Longte does not make submissions to the Chinese Bureau of Statistics or to any other government organisation.

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

Not applicable because Longte does not make submissions to the Chinese Bureau of Statistics or to any other government organisation.

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

Not applicable because Longte does not make submissions to the Chinese Bureau of Statistics or to any other government organisation.

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

Not applicable because Longte does not make submissions to the Chinese Bureau of Statistics or to any other government organisation.

H-11 Regional differences

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

Longte does not have production facilities in more than one region. Nonetheless, Longte cannot imagine that the laws and regulations would be different in any region and has not encountered any such differences. There are no pricing restrictions or limitations on sales of grinding balls in China so far as Longte is aware.

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?

Longte's production of grinding balls is not subject to any national/regional industrial policy or guidance.

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

FOR PUBLIC RECORD

Not applicable since Longte's production of grinding balls is not subject to any national/regional industrial policy or guidance.

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

There are no restrictions on the sale of grinding balls imposed by the Government of China.

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

Please refer to Attachment H-12.4 [CONFIDENTIAL ATTACHMENT] for a list of domestic customers as requested.

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.

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

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

Longte does not require an export license.

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

Grinding balls sold by Longte have not been subject to any export restrictions and/or limits during the previous five years.

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

There are no restrictions placed upon Longte in relation to the sale of the goods.

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

Yes, Longte's production capacity in relation to the goods has changed over the last five years. Production capacity has increased because Longte has expanded its production facilities in order to upgrade its facilities and to meet the market demand.

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?

Longte does not benefit from any concession on the purchase of any utility

services.

H-13 Sales price

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

Longte has not been subject to any direct or indirect price guidance or controls by the Government of China during the period.

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

Longte has not been subject to any direct or indirect price guidance or controls by the Government of China during the period with respect to raw material inputs.

Longte observes that the relevant Chinese steel prices during the review period are higher than those in the market at the time of the original investigation. Longte considers that this is due to high prices for raw materials such as iron ore and higher environmental standards for steel production.

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

Longte has not encountered any price guidance or controls established by regional, provincial or special economic zone officials and/or organisations.

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

The selling price of the goods is determined by negotiation with the customers with reference to market conditions, including costs, supply, demand, customer preference, service provision and profitability requirements. There are no restrictions, limitations, or other considerations imposed on Longte in forming its selling prices.

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

Market competition between grinding ball producers is vigorous. In this circumstance no individual manufacturer or seller is in a position to exercise price leadership in relation to sales of the goods in the market.

Further, given Longte's focus on the production and sales of high quality premium products, its business is export focused. Domestic sales accounted for a smaller portion of its total sales during the review period.

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.

FOR PUBLIC RECORD

Longte does not have a pricing committee in respect of the goods.

7. How often does the pricing committee meet to discuss selling prices of the goods? Provide the minutes or any other relevant documents of all meetings of the pricing committee during the period.

Not applicable, see the response to question H-13.6 above.

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

Longte's sales manager is responsible for the sales terms, prices and other contract provisions for the sale of the goods.

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.

Longte is not aware of the laws and regulations in different regions of China being any different with respect to pricing of the goods.

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.

Longte has no recent plan to add capacity or establish a joint venture, and no knowledge of the current approval processes.

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.

Longte has not encountered such request during the POR.

H-15 Raw materials

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

As we explained above, Longte purchased most of the grinding bars as raw materials from its parent company Longteng.

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

Yes. Longte purchased some raw materials on the open market from State invested enterprises. When purchasing, Longte considers a supplier's selling prices and product quality, regardless of the nature of the supplier's business.

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

Not applicable in that Longte's suppliers are not based outside of China.

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

Price differences come about by reason of separate negotiations being carried out by Longte with different suppliers. Price differences will be wider, or narrower, depending on the positions of the two parties (Longte and its supplier) in any individual negotiation.

[CONFIDENTIAL TEXT DELETED – commercial arrangement relating to raw material supply]

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.

The vast majority of the grinding bar purchased by Longte during the POR was supplied and produced by its parent company Longteng. Where Longte is required to purchase grinding bar from unaffiliated parties as a supplementation to Longteng's supply, Longte provides its requirements concerning the quality of raw material to potential suppliers and seeks quotations. Longte will then carry out a comprehensive evaluation of price, quality and other factors before choosing the supplier who will receive an order. These purchases do not take place by way of tendering.

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.

Not applicable. Longte did not purchase any imported raw materials for producing the goods during the POR. On the other hand, most of the iron ore purchased by Longteng during the POR was imported.

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?

FOR PUBLIC RECORD

- 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.

Please refer to the answer to question H-15.4.

[CONFIDENTIAL TEXT DELETED – commercial arrangement relating to raw material supply]

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.

No, The grinding balls sold by Longte are not subject to any export quotas.

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

Not applicable since the grinding balls sold by Longte are not subject to any export quotas.

3. 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.

Grinding balls are neither presently nor previously (including the investigation period) subject to quotas.

**SECTION I
COUNTERVAILING**

This section is not applicable for Longte.

EXPORTER'S DECLARATION

I hereby declare that **Changshu Longte Grinding Ball 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 : Chen Jie

Signature : 

Position in
Company : Export Manager

Date : September 9, 2019