



## Exporter Questionnaire

**Case number:** 521

**Product:** Zinc Coated (Galvanised) Steel

**From:** The People's Republic of China

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

**Response  
due by:** 30 September 2019

**Case  
manager:** Heidi Yang

**Phone:** +61 3 9268 7969

**Return completed questionnaire to:**  
[investigations1@adcommission.gov.au](mailto:investigations1@adcommission.gov.au)

**Anti-Dumping Commission website:**  
[www.adcommission.gov.au](http://www.adcommission.gov.au)

## **TABLE OF CONTENTS**

<b>TABLE OF CONTENTS .....</b>	<b>2</b>
<b>INSTRUCTIONS.....</b>	<b>4</b>
<b>CHECKLIST.....</b>	<b>7</b>
<b>GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES .....</b>	<b>9</b>
<b>SECTION A COMPANY INFORMATION .....</b>	<b>12</b>
A-1    COMPANY REPRESENTATIVE AND LOCATION .....	12
A-2    COMPANY INFORMATION .....	12
A-3    GENERAL ACCOUNTING INFORMATION .....	14
A-4    FINANCIAL DOCUMENTS.....	15
<b>SECTION B EXPORT SALES TO AUSTRALIA.....</b>	<b>16</b>
B-1    AUSTRALIAN EXPORT SALES PROCESS.....	16
B-2    AUSTRALIAN SALES LISTING.....	17
B-3    SAMPLE EXPORT DOCUMENTS .....	17
B-4    RECONCILIATION OF SALES TO FINANCIAL ACCOUNTS .....	17
B-5    RECONCILIATION OF DIRECT SELLING EXPENSES TO FINANCIAL ACCOUNTS.....	18
<b>SECTION C EXPORTED GOODS &amp; LIKE GOODS .....</b>	<b>19</b>
C-1    MODELS EXPORTED TO AUSTRALIA .....	19
C-2    MODELS SOLD IN THE DOMESTIC MARKET.....	19
C-3    INTERNAL PRODUCT CODES.....	19
<b>SECTION D DOMESTIC SALES.....</b>	<b>21</b>
D-1    DOMESTIC SALES PROCESS.....	21
D-2    DOMESTIC SALES LISTING .....	22
D-3    SAMPLE DOMESTIC SALES DOCUMENTS .....	22
D-4    RECONCILIATION OF SALES TO FINANCIAL ACCOUNTS .....	23
<b>SECTION E DUE ALLOWANCE .....</b>	<b>24</b>
E-1    CREDIT EXPENSE .....	24
E-2    PACKAGING .....	24
E-3    DELIVERY.....	25
E-4    OTHER DIRECT SELLING EXPENSES .....	25
E-5    OTHER ADJUSTMENT CLAIMS .....	26
<b>SECTION F THIRD COUNTRY SALES.....</b>	<b>27</b>
F-1    THIRD COUNTRY SALES PROCESS .....	27
F-2    THIRD COUNTRY SALES LISTING .....	27
F-3    DIFFERENCES IN SALES TO THIRD COUNTRIES .....	27
<b>SECTION G COST TO MAKE AND SELL.....</b>	<b>28</b>
G-1.    PRODUCTION PROCESS .....	28
G-2.    COST ACCOUNTING PRACTICES.....	28
G-3    COST TO MAKE ON DOMESTIC MARKET .....	29
G-4    SELLING, GENERAL & ADMINISTRATION EXPENSES .....	30
G-5    COST TO MAKE THE GOODS EXPORTED TO AUSTRALIA.....	30
G-6    COST ALLOCATION METHODOLOGY.....	30
G-7    MAJOR RAW MATERIAL COSTS .....	31
G-8    RECONCILIATION OF COST TO MAKE TO AUDITED FINANCIAL STATEMENTS .....	32
G-9    CAPACITY UTILISATION .....	33
<b>SECTION H PARTICULAR MARKET SITUATION.....</b>	<b>34</b>
H-1    REPORTING REQUIREMENTS.....	34
H-2    BUSINESS STRUCTURE, OWNERSHIP AND MANAGEMENT .....	34
H-3    LICENSING.....	36

**FOR PUBLIC RECORD**

H-4	DECISION-MAKING, PLANNING AND REPORTING .....	37
H-5	FINANCIAL AND INVESTMENT ACTIVITIES.....	38
H-6	GOVERNMENT POLICY ON THE INDUSTRY .....	39
H-7	TAXATION.....	40
H-8	SALES TERMS .....	40
H-9	INDUSTRY ASSOCIATIONS.....	41
H-10	STATISTICS SUBMISSION/RECORDING .....	41
H-11	PRODUCTION/OUTPUT .....	42
H-12	SALES PRICE .....	43
H-13	ADDING CAPACITY AND/OR JOINT VENTURES .....	44
H-14	RAW MATERIALS .....	44
<b>SECTION I COUNTERVAILING .....</b>		<b>46</b>
I-1	GENERAL .....	46
I-2	PROVISION OF GOODS AT LESS THAN ADEQUATE REMUNERATION .....	47
I-3	PREFERENTIAL TAX POLICIES .....	47
I-4	FINANCIAL GRANTS.....	49
I-5	TARIFF AND VAT EXEMPTIONS ON IMPORTED MATERIALS AND EQUIPMENT .....	50
I-6	OTHER PROGRAMS .....	52
<b>EXPORTER'S DECLARATION .....</b>		<b>55</b>
<b>APPENDIX GLOSSARY OF TERMS .....</b>		<b>56</b>

## INSTRUCTIONS

### Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the Commission) is conducting a review of measures applying to zinc coated (galvanised) steel exported to Australia from the People's Republic of China (China), the Republic of India (India), the Republic of Korea (Korea), Malaysia, Taiwan, and the Socialist Republic of Vietnam (Vietnam). This questionnaire is only for exporters from China. Another exporter questionnaire is available for exporters from India, Korea, Malaysia, Taiwan or Vietnam.

The Commission will use the information you provide to determine normal values and export prices over the review period 1 July 2018 to 30 June 2019 (the period). This information will determine whether zinc coated (galvanised) steel is dumped. The Commission will also use this information to determine whether zinc coated (galvanised) steel has been in receipt of countervailable subsidies over the period.

### If you do not manufacture the goods

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

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

### What happens if you do not respond to this questionnaire?

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

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

### Extension requests

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

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

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

More information on extensions can be found in the Customs (Extension of Time and Non-cooperation) Direction 2015 at <https://www.legislation.gov.au/Details/F2015L01736>.

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

## FOR PUBLIC RECORD

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

### **Submitting a response to the exporter questionnaire**

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

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

### **Confidential and non-confidential responses**

You are required to lodge a confidential version (for official use only) and a non-confidential version (for public record) of your response to this exporter questionnaire by the due date. Please ensure that *each page* of information you provide is clearly marked either "FOR OFFICIAL USE ONLY" or "PUBLIC RECORD".

All information provided to the Commission in confidence will be treated accordingly. The non-confidential version of your submission will be placed on the public record, and must contain sufficient detail to allow a reasonable understanding of the substance of the information, but does not breach confidentiality nor adversely affect those interests.

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

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

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

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

### **Verification of the information that you supply**

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

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

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

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

## FOR PUBLIC RECORD

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

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

You will be provided with an opportunity to comment on the accuracy and confidentiality of the verification report prior to its publication on the public record.

The Commission may elect to undertake an alternative verification methodology than an on-site verification to satisfy itself of the completeness, relevance and accuracy of the data.

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

### **Important instructions for preparing your response**

- All questions in this exporter questionnaire must be completed. If a question is not applicable to your situation, please answer the question with "Not Applicable" and provide an explanation as to why.
- All questions must be answered in English. An English translation must be provided for documents not originally in English.
- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same measurement consistently throughout your response to the questionnaire.
- Label all attachments to your response according to the section of the questionnaire it relates to (e.g. label the chart of accounts as Attachment A-4.6)
- The data must be created as spreadsheet files in Microsoft Excel.
- If you have used formulas to complete spreadsheets, these formulas must be retained and not hard-coded.
- You must retain all worksheets used in answering the questionnaire. Be prepared to provide these worksheets during the Commission's verification of your data.
- If you cannot present electronic data in the requested format contact the case officer as soon as possible.
- Where possible, electronic data should be emailed or shared with the Commission via SIGBOX, a secure online document repository. Please contact the case manager to request access to SIGBOX if required.

## CHECKLIST

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

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 & 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	<input checked="" type="checkbox"/>
Section H Particular market situation	<input checked="" type="checkbox"/>
<p><b>H-1 Reporting requirements</b></p> <p>1. Describe generally all interaction that your business has with the Government of China at all levels, including (but not limited to):</p> <ul style="list-style-type: none"> <li>(a) reporting requirements;</li> <li>(b) payment of taxes;</li> <li>(c) senior management representation within your business;</li> <li>(d) supervision by the State-owned Assets Supervision and Administration Commission (SASAC) or a body under the control of SASAC.</li> <li>(e) approval/negotiation of business decisions (e.g. investment decisions, management decisions, pricing decisions, production decisions, sales decisions);</li> <li>(f) licensing;</li> <li>(g) restrictions on land use;</li> <li>(h) provision of loans; or</li> <li>(i) provision of grants, awards or other funds.</li> </ul> <p><b>ANSWER:</b>  <b>The company is a small private company, and its normal interaction with the Government of China includes the following:</b></p> <ul style="list-style-type: none"> <li>• <b>Applying the Business license and Foreign trade entity export record</b></li> <li>• <b>Filing the monthly financial statements, VAT tax returns, paying VAT taxes and additional taxes if any;</b></li> <li>• <b>Filing the quarterly income tax returns and paying corporate income taxes.</b></li> </ul>	

As a private company, there is no representation from any levels of the government and the company does the business based on decisions of the Board of directors and Board of shareholders.

## 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 Government of China (GOC) (either through direct ownership or through association).

**ANSWER:**

**Not applicable, the company is a small private company.**

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

**ANSWER:**

**The company only has one Executive director, Mr. Yaolong Zhang during the period, and for shareholders, in November 2018, shareholders changed from [CONFIDENTIAL INFORMATION regarding the changes of the directors].**

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

**ANSWER:**

**Not applicable, the company didn't have related businesses.**

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

**ANSWER:**

**Not applicable, there are no members of the company 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**

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

**ANSWER:**

**Not applicable, the company's Board of Directors or Board of Shareholders doesn't have representatives from the Chinese Communist Party (CCP)**

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

**ANSWER:**

**Not applicable, there are no such members.**

7. Indicate who owns what percentage of all shares in your business and identify whether they are:



**FOR PUBLIC RECORD**

- an affiliate, representative, agency or otherwise representative of the Government of China;
- employees of your business;
- foreign investors; or
- other (please specify).

**ANSWER:**

**Mr. Yaolong Zhang is the sole shareholder of the company, who is the executive director of the company.**

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

**ANSWER:**

**The company only has one Executive director, Mr. Yaolong Zhang during the period, and for shareholders, in November 2018, shareholders changed from [CONFIDENTIAL INFORMATION regarding the changes of the directors].**

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

**ANSWER:**

**Not applicable, there are no such positions.**

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

**ANSWER:**

**As far as the company knows, there are no such requirements.**

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

**ANSWER:**

**Not applicable, the company is a private company.**

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

**ANSWER:**

**Not applicable, the company is a small private company.**

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

**ANSWER:**

**Normally, board of shareholders and board of directors have full power to reward, fire or discipline your business' senior managers**

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

**ANSWER:**

**Not applicable, the company's senior managers don't hold any positions in any Government of China departments or organisations, associations or Chambers of Commerce.**

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

**ANSWER:**

**Not applicable, the company didn't have pricing committee, the prices are determined by the Executive director, Mr. Yaolong Zhang.**

### **H-3 Licensing**

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

**ANSWER:**

**Please refer to Appendix H-3.1 Business License.**

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

**ANSWER:**

**Guan County Market Supervision Administration**

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

**ANSWER:**

**Normal procedure for applying the license:**

1. Applying preapproval of Company name to government;
2. Renting a house as company address;
3. Submitting Articles of Association for the company;
4. Claiming Letter of bank inquiry from CPA;
5. Opening bank account of the company;
6. Claiming Capital verification report;
7. Registering company before government;

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

**ANSWER:**

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

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

**ANSWER:**

**The company could operate under business scope indicated in the Business license, please refer to Appendix H-3.**

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

**ANSWER:**

**If the company acts outside the scope of business license, the registration authority shall caution, impose a fine, confiscate illegal gains, order the company to stop doing business for internal rectification, withhold or even revoke the business license according to specific circumstances.**

**In the other side, the company could apply for adding the business scope, then we could act according to the new business scope.**

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

**ANSWER:**

**Under the business license, the company could operate legally. In China, if someone do business without a business license, the department of**

administration for industry and commerce will ban it and confiscate illegal gains.

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

**ANSWER:**

**The business license could be revoked under the following circumstances:**

- (1) The company is declared bankrupt as provided by law;**
- (2) pursuant to the provisions of the company's articles of association, the term of operation of the company expires, or one of the other events which are grounds for dissolution occurs;**
- (3) A resolution of dissolution is passed by the shareholders;**
- (4) dissolution is necessary due to a merger or division of the company; or**
- (5) the company is ordered to close down in accordance with law.**

#### **H-4 Decision-making, planning and reporting**

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

**ANSWER:**

**The company is private company, the Executive director of the company are responsible to make decisions of the company, including production, sales, distribution of profits.**

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

**ANSWER:**

**Not applicable, the company is a private company, none of any levels of government of China are involved in the company's business or management.**

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

**ANSWER:**

**Not applicable, the company is a private company, none of any levels of government of China are involved in the company's business or management.**

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

**ANSWER:**

**Not applicable, the company is a small private company, which are not required to submit reports to the Government of China.**

5. Provide a copy of the last two Provincial/City Five Year Plans (including the appendices) for the province/city in which your business is located, whichever is

applicable. The copies should be fully translated including the appendices, along with the original Chinese version.

**ANSWER:**

**Not applicable, the company is a private company, which doesn't have such documents.**

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

**ANSWER:**

**Not applicable, the company didn't have five-year plans.**

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

**ANSWER:**

**Not applicable, the company didn't hold Board of directors and Board of shareholders meetings during the period.**

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

**ANSWER:**

**Pricing decisions on the goods under consideration are made by Executive director of the company, Mr. Yaolong Zhang based on its judgement over material prices and the market situation, and there are no company meetings involved.**

## H-5 Financial and investment activities

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

**ANSWER:**

**Please refer to Appendix I-6.2 Loans.**

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

**ANSWER:**

**Please refer to Appendix I-6.2 Loans.**

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

**ANSWER:**

**Please refer to Appendix I-6.2 Loans.**

4. Has your business raised any capital using issuance of shares, preferential shares, rights issue, bonds, warrants, debentures, sub-ordinate loans or any other debt and/or equity instruments in the last 5 years? If yes:

- a. explain what instruments were used;
- b. identify the type (e.g., government guarantee) and provider of the security; and
- c. explain the reasons for raising the capital.

**ANSWER:**

**Not applicable, the company didn't raise any capital using ways described in the question.**

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

**ANSWER:**

**Not applicable, the company has no such policies.**

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

**ANSWER:**

**Not applicable, the company didn't make such investments.**

## **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:
- copy of the documentation and a translation in English;
  - documentation concerning the Government of China or any association of the Government of China's notification of the measures concerning the goods to your company during the period.

**ANSWER:**

**The company is a private company which has no access to such information.**

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

**ANSWER:**

**The company is a private company which has no access to such information.**

3. Describe any role your company plays in the development of government's industrial plans and/or policies at all levels of government. For example, does your company provide information for, or request inclusion in, any plans, policies, or measures?

**ANSWER:**

**Not applicable, the company didn't play role in the development of government's industrial plans or policies.**

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

**ANSWER:**

**The company is a private company which has no access to such information.**

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.
- Explain the purpose of these designations, the criteria for receiving any such designation, and the benefits or obligations that arise from each such designation.
  - Is there any connection between these designations and five-year plans or other industrial and/or economic policies or administrative measures?
  - Describe any instances in which your company cited Government of China plans, policies, or measures as support for receiving the financing that you report.

**ANSWER:**

**Not applicable, the Government of China didn't grant the company such titles.**

## **H-7 Taxation**

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

**ANSWER:**

**There are no export taxes on exports of the goods during the period.**

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

**ANSWER:**

**Please refer to Appendix H-7.3 VAT Rebate And Government Notices.**

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

**ANSWER:**

**Please refer to Appendix H-7.3 VAT Rebate And Government Notices.**

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

**ANSWER:**

**None.**

## **H-8 Sales terms**

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

**ANSWER:**

**Mr. Yaolong Zhang, the Executive director, is the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by the company.**

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

**ANSWER:**

**Mr. Yaolong Zhang, the Executive director, is the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by the company.**

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

**ANSWER:**

**Not applicable, the company doesn't coordinate the selling prices or supply of the goods with other domestic producers or any Government of China departments.**

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

**ANSWER:**

**As a small private company, the company is not required to provide information or data to the Government of China.**

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

**ANSWER:**

**As a private company, the company doesn't provide data to any other person.**

## **H-9 Industry associations**

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

**ANSWER:**

**Not applicable, the company is not a member of industry associations.**

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

**ANSWER:**

**Not applicable, the company is not a member of industry associations.**

## **H-10 Statistics submission/recording**

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

**ANSWER:**

**Not applicable, the company doesn't make submissions to the Chinese Bureau of Statistics or any other government organization.**

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

**ANSWER:**

**Not applicable, the company doesn't make submissions to the Chinese Bureau of Statistics or any other government organization.**

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

**ANSWER:**

**Not applicable, the company doesn't make submissions to the Chinese Bureau of Statistics or any other government organization.**

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

**ANSWER:**

**Not applicable, the company doesn't make submissions to the Chinese Bureau of Statistics or any other government organization.**

## H-11 Production/output

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

**ANSWER:**

**Not applicable, the company, as a private company, is not subject to any national/regional industrial policy or guidance.**

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

**ANSWER:**

**Not applicable, the company doesn't respond to the policies/guidelines.**

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

**ANSWER:**

**Not applicable, there are no other restrictions to the sale of the goods or like goods imposed by the Government of China.**

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

**ANSWER:**

**Please refer to the spreadsheet "List of Clients" in the Appendix D-2.**

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

**ANSWER:**



**Not applicable, there are no restrictions or conditions in relation to the quality or quantity of the production of the goods placed upon our company.**

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

**ANSWER:**

**Chinese companies are required apply the Foreign Trade Company License Record Form before making exports.**

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

**ANSWER:**

**Not applicable, there are no such restrictions.**

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

**ANSWER:**

**Not applicable, there are no other restrictions.**

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

**ANSWER:**

**Not applicable, there are no changes for the company production capacity over the last 5 years.**

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

**ANSWER:**

**Not applicable, there are no such concessions.**

## **H-12 Sales price**

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

**ANSWER:**

**Not applicable, the company was not 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.

**ANSWER:**

**Not applicable, the company was not subject to any direct or indirect price guidance or controls by the Government of China during the period.**

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

**ANSWER:**

**Not applicable, the company didn't encounter price guidance or controls established by regional, provincial or special economic zone officials and/or organisations.**

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

**ANSWER:**

**The selling prices of the goods are determined by Mr. Yaolong Zhang, the Executive director of the company during the review.**

**There are no restrictions, limitations, or other consideration imposed on the company.**

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

**ANSWER:**

**As far as the company knows, the selling prices are determined by prices of raw materials and market situation, there are no such organization / business entity.**

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

**ANSWER:**

**Not applicable, the company doesn't have pricing committee.**

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

**ANSWER:**

**Not applicable, the company doesn't have pricing committee.**

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

**ANSWER:**

**The selling prices of the goods are determined by Mr. Yaolong Zhang, the executive director of the company.**

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

**ANSWER:**

**Not applicable, the company's production of facility is only located in Shandong province.**

### **H-13 Adding capacity and/or joint ventures**

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

**ANSWER:**

**As far as the company knows, adding capacity shall submit duly evaluation on the Environmental protection, Securities and land use to government of China.**

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

**ANSWER:**

**The company doesn't know the relevant information.**

**H-14 Raw materials**

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

**ANSWER:**

**Not applicable, the company didn't have related or affiliated suppliers.**

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

**ANSWER:**

**Yes, the company identify the SIEs in the raw material purchase listings.**

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

**ANSWER:**

**Not applicable, the company purchased the whole raw materials domestically.**

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

**ANSWER:**

**Different suppliers have different prices due to product qualification, specifications etc, it is nearly impossible that different suppliers have same prices.**

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

**ANSWER:**

**The company purchase raw materials based on specifications required in the sales orders and prices of the raw materials, and the prices are generally determined the suppliers, and the company will select the suppliers with lowest prices.**

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

**ANSWER:**

**Not applicable, all raw materials are purchased domestically.**

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?
- Please provide a description of the raw material or semi-processed goods which are sold, including whether they are domestic or export transactions, to related or unrelated parties, and how the selling price is determined.

b. If there is a difference in selling prices between related and unrelated parties, please provide reasons as to why.

**ANSWER:**

**The company sold the hot rolled steel coils, pickling coils, cold rolled steel coils in domestic market during the period of review.**

**The company sold the hot rolled steel coils to related and unrelated parties, the prices are determined according to market situation. There are no differences in selling prices between related and unrelated parties.**

## SECTION I COUNTERVAILING

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

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

30	High and New Technology Enterprise Grant	
31	Independent Innovation and High-Tech Industrialisation Program	
32	VAT refund on domestic sales by local tax authority	
33	Environmental Prize	
34	Jinzhou District Research and Development Assistance Program	

**I-1 General**

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

**ANSWER:**  
Please refer to Appendix I-1 Company Turnover.

**I-2 Provision of goods at less than adequate remuneration**

The most recent reviews (Review 456 and 457) considered claims that public bodies (in the form of SOEs/ SIEs) were supplying hot rolled coil steel, coking coal and coke, directly or indirectly to manufacturers of zinc coated (galvanised) steel and / or aluminium zinc coated steel at less than fair value. The following programs were found to be countervailing:

- **Program 27:** Hot rolled steel provided by government at less than fair market value.

1. Describe the nature of your production process for the goods, including an itemised list of all raw materials used by your company in the process.

**ANSWER:**  
Please refer to Appendix G-1 Production Process.

2. Did your business or any company/entity related to your business receive any benefit under the above programs during the period? If yes, provide details.

**ANSWER:**  
**The company is a private company and purchased all materials with fair value in the market, never received any profits.**

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

**ANSWER:**  
**The company is a private company and purchased all materials with fair value in the market, never received any profits.**

4. Provide copies of all contractual agreements that detail the obligations of the State Invested Enterprise (SIE) and your business with reference to the granting and receipt of the assistance/benefits.

**ANSWER:**

**The company is a private company and purchased all materials with fair value in the market, never received any profits.**

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

**ANSWER:**

**Not applicable, the company didn't import raw materials.**

### **I-3 Preferential tax policies**

1. Complete the worksheet named "I-3 Income Tax"
- This worksheet is a table of your company's income tax liability over the last three financial years.
  - You must provide this table in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Did your business or any company/entity related to your business receive any benefit under the following income tax programs during the review period (1 July 2018 to 30 June 2019):
- **Program 1:** Preferential Tax Policies for Enterprises with Foreign Investment Established in the Coastal Economic Open Areas and in Economic and Technological Development Zones
  - **Program 2:** Preferential Tax Policies for Foreign Invested Enterprises - Reduced Tax Rate for Productive Foreign Invested Enterprises scheduled to operate for a period not less than 10 years
  - **Program 3:** Preferential Tax Policies for Enterprises with Foreign Investment Established in Special Economic Zones (excluding Shanghai Pudong area)
  - **Program 4:** Preferential Tax Policies for Enterprises with Foreign Investment Established in Pudong area of Shanghai
  - **Program 5:** Preferential Tax Policies in the Western Regions
  - **Program 6:** Land Use Tax Deduction
  - **Program 7:** Preferential Tax Policies for High and New Technology Enterprises
  - **Program 8:** Tariff and value-added tax (VAT) Exemptions on Imported Materials and Equipments
  - **Program 32:** VAT refund on domestic sales by local tax authority
3. Provide a copy of your company's annual tax return for the last three financial years. If the documents are not in English, please provide a translation of the documents.

**ANSWER:**

**Please refer to Appendix I-3.3 Annual Tax Returns 2016-2018.**

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

**ANSWER:**

**Not applicable, the company didn't incur income tax over the last three financial years.**

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

**ANSWER:**

**General tax rate for enterprises are 25%.**

6. Did your company pay less than the general tax rate for enterprises referred to in question I-3.4? If yes:
- a. What tax rate did your company pay?
  - b. Was the reduction in the tax paid or payable related to any of the preferential income tax programs in the table at the top of above?
  - c. What is the name of the program?
  - d. What is the name of the authority granting your company the reduced tax rate?
  - e. What is the eligibility criteria to benefit from the reduced tax rate?
  - f. Provide details of the application process
  - g. Provide a copy of the blank application form. If the documents are not in English, please provide a translation of the documents.
  - h. Provide a copy of your company's completed application form, including all attachments to the application form. If the documents are not in English, please provide a translation of the documents.
  - i. Provide a copy of any confirmation or other correspondence from the authority approving your company for the reduction in tax rate. If the documents are not in English, please provide a translation of the documents.
  - j. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.

**ANSWER:**

**Not applicable, the company didn't pay income tax over the last three years.**

#### **I-4 Financial grants**

In the most recent reviews (Review 456 and 457), the Commission determined that the following countervailable subsidy programs have been received by Chinese exporters of the goods.

- **Program 9:** One-time Awards to Enterprises Whose Products Qualify for 'Well-Known Trademarks of China' and 'Famous Brands of China'
- **Program 10:** Matching Funds for International Market Development for small and medium size enterprises (SMEs)
- **Program 11:** Superstar Enterprise Grant
- **Program 12:** Research & Development (R&D) Assistance Grant
- **Program 13:** Patent Award of Guangdong Province
- **Program 14:** Innovative Experimental Enterprise Grant
- **Program 15:** Special Support Fund for Non-State-Owned Enterprises
- **Program 16:** Venture Investment Fund of Hi-Tech Industry
- **Program 17:** Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment
- **Program 18:** Grant for Key Enterprises in Equipment Manufacturing Industry of Zhongshan
- **Program 19:** Water Conservancy Fund Deduction
- **Program 20:** Wuxing District Freight Assistance
- **Program 21:** Huzhou City Public Listing Grant
- **Program 22:** Huzhou City Quality Award
- **Program 23:** Huzhou Industry Enterprise Transformation & Upgrade Development Fund
- **Program 24:** Wuxing District Public List Grant
- **Program 25:** Anti-dumping Respondent Assistance
- **Program 26:** Technology Project Assistance
- **Program 28:** Capital injection
- **Program 29:** Environmental protection grant
- **Program 30:** High and New Technology Enterprise Grant
- **Program 31:** Independent Innovation and High-Tech Industrialisation Program

- **Program 33:** Environmental Prize
- **Program 34:** Jinzhou District Research and Development Assistance Program

1. Complete the worksheet named "I-4 Grants"
  - This worksheet is a table of the grants received by company over the period plus the two preceding years.
  - You must provide this table in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.

**ANSWER:**

**Not applicable, the company didn't have such grants.**

2. Provide a copy of your company's non-operating income and/or other business income ledgers, extracted directly from your accounting system, for the period covering the period plus the 2 preceding years.

**ANSWER:**

**Please refer to Appendix I-4.2 Non-operating Income Ledger.**

3. Did your company receive any grants (or any other financial contribution) from any level of government during the period plus the two preceding years?

If yes:

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

**ANSWER:**

**Not applicable, the company didn't have any grants.**

4. For each of the grants listed in I-4.3:
  - a. What is the name of the grant?
  - b. What is the name of the authority providing the grant?
  - c. What is the eligibility criteria to receive the grant?
  - d. Is the grant directly related to the goods under consideration, export sales to Australia and/or export sales generally?
  - e. Provide details of the application process.
  - f. Provide a copy of the blank application form. If the documents are not in English, please provide a translation of the documents.
  - g. Provide a copy of your company's completed application form, including all attachments to the application form. If the documents are not in English, please provide a translation of the documents.
  - h. Provide a copy of any confirmation or other correspondence from the authority approving the grant. If the documents are not in English, please provide a translation of the documents.
  - i. Provide proof of payment of your company receiving the grant (e.g. bank statements).
  - j. Provide a copy of the accounting journal entries relating to the grant.
  - k. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the grant.

**ANSWER:**

**Not applicable, the company didn't have any grants.**

## **I-5 Tariff and VAT exemptions on imported materials and equipment**



**FOR PUBLIC RECORD**

It is the Commission's understanding that certain enterprises in China are eligible for exemption from the payment of import duty and import VAT under the following program:

- **Program 8:** Tariff and value-added tax (VAT) Exemptions on Imported Materials and Equipments

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

**ANSWER:**

**This section is not applicable, the company doesn't use imported materials and equipment.**

1. Please complete worksheet "I-5 VAT and tariff transactions".
2. Provide complete details involving the amount of the VAT refund received, including whether the refund was received in a lump sum or multiple instalments.
3. Describe the application and approval procedures for obtaining a benefit under the program.
4. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the GOC in relation to the program.
5. Outline the fees charged to or expenses incurred by your business in receiving the program.
6. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
7. State whether your eligibility for the program was conditional on one or more of the following criteria:
  - a) whether or not your business exports internationally, or has increased its exports;
  - b) the use of domestic rather than imported inputs;
  - c) the industry to which your business belongs; or
  - d) the region in which your business is located.
8. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
9. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.
10. Indicate where benefits under this program can be found in your accounting system (i.e. specify the ledgers or journals) and financial statements.
11. Were the materials and/or equipment that were entitled to a refund of VAT used in the production of the goods during the investigation period? If yes, provide the following information:
  - (a) type of inputs;
  - (b) cost of inputs;
  - (c) quantity of inputs; and
  - (d) amount of VAT refunded.

**FOR PUBLIC RECORD**

<p>12. Has your company received exemption from payment of or refunds of import duty and import VAT for imported material inputs (e.g. hot rolled coil, coking coal and coke) at any time that were used in the production of the goods during the investigation period? If yes, provide the following information:</p> <ul style="list-style-type: none"><li>(a) description of imported product;</li><li>(b) country of origin;</li><li>(c) quantity of imported product;</li><li>(d) purchase price;</li><li>(e) terms of purchase (e.g. FOB, CIF);</li><li>(f) ocean freight;</li><li>(g) value for duty of imported product;</li><li>(h) regular rate of taxes and duties;</li><li>(i) concessionary rate of taxes and duties;</li><li>(j) amount of duties and taxes normally applicable;</li><li>(k) amount of duties and taxes paid;</li><li>(l) amount of duties and taxes exempt;</li><li>(m) date of importation;</li><li>(n) tariff classification number;</li><li>(o) customs entry number; and</li><li>(p) application fee.</li></ul> <p>13. Explain if (and how) the GOC determines which imported inputs are consumed by your business in the production of the subject goods and in what amounts, and the amount of duty paid or payable on the inputs (including any allowance for waste).</p> <p>14. Explain how the GOC determined the percentage rate of duty exemption.</p> <p>Please note that goods consumed in the production of exported goods (inputs) include:</p> <ul style="list-style-type: none"><li>(a) goods incorporated into the exported goods; and</li><li>(b) energy, fuel, oil and catalysts that are used or consumed in the production of the exported goods.</li></ul> <p>15. Provide a representative sample of copies of import entry documents (for example: bill of entry, invoice from supplier, etc.) for each type of importation covering duty-exempt inputs and duty-paid inputs imported for use in the manufacturing of the subject goods.</p> <p>16. In addition to the import entry documents, you must also provide copies, if applicable, of any applications submitted to and/or approval document received from the GOC relating to the exemption from the payment of import duty and import VAT on imported inputs and in relation to the VAT that is refunded on the exportation of the subject goods.</p> <p>17. Provide copies of reports and audits by the GOC authority responsible for administering the duty rebate or duty drawback scheme with respect to the verification of the importation and use of inputs and the remittance or drawback of the related duty paid or payable.</p> <p>18. To your knowledge, does the program still operate or has it been terminated?</p> <p>If the program has been terminated, please provide details (when, why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?</p> <p>If the program terminated has been substituted for by another program, identify the program.</p>	
---	--

## I-6 Other Programs

**ANSWER:**

**This section is not applicable, the company didn't receive benefits from other programs.**

1. Provide a list of all the provinces in which you have business operations (including locations of factories, sales offices, or other places of business).

**ANSWER:**

**The company is operated in Shandong province.**

2. Are you aware of any programs of the Government of China, any of its agencies or any other authorised body that benefits manufacturers of the goods that have not been accounted for in this questionnaire? Provide the name of those programs you are aware of (even if your company is not eligible to receive benefit under the program.)

**ANSWER:**

**Not applicable, the company is not aware of programs of Government of China.**

3. Indicate the location of the program by region, province or municipal level

**ANSWER:**

**Not applicable, the company is not aware of programs of Government of China, and the company never receive the program.**

4. Indicate the type of program, for example:
  - the provision of grants, awards or prizes;
  - the provision of goods or services at a reduced price (e.g. electricity, gas, transport);
  - the reduction of tax payable including income tax and VAT;
  - reduction in land use fees;
  - loans from Policy Banks at below-market rates; or
  - any other form of assistance.

**ANSWER:**

**Not applicable, the company is not aware of programs of Government of China, and the company never receive the program.**

For **each program and any additional programs** that you have identified that are not listed in Section I, complete the worksheet "I-6.1 any other program", and answer the following questions below. For **each loan and any additional loans** that you have identified that are not listed in Section I, complete the worksheet "I-6.2 loans", and answer the following questions below.

5. Indicate whether your company benefited from any of the listed programs during the period.

**ANSWER:**

**The company took the loans from Shandong Liaocheng Runchang Rural Commercial Bank Co., Ltd., please refer to Appendix I-6.2 for details of the loan.**

<p><b>Shandong Liaocheng Runchang Rural Commercial Bank Co., Ltd. is not a state-owned bank and the loan terms are business terms, therefore, the company didn't receive benefit or subsidy from the loan.</b></p> <p>6. Indicate which goods you produced that benefited from the program (e.g. the program have benefited all production or only certain products that have undergone research development).</p> <p><b>ANSWER:</b> <b>The company used the loans to purchase raw materials for the production of Cold-rolled coils, GI coils and Colour collated coils etc.</b></p> <p><b>As indicated above, the company got the loan from private business bank, therefore, the company didn't receive subsidy from the loan.</b></p> <p>7. Describe the application and approval procedures for obtaining a benefit under the program.</p> <p><b>ANSWER:</b> <b>As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.</b></p> <p>8. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the Government of China in relation to the program.</p> <p><b>ANSWER:</b> <b>As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.</b></p> <p>9. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.</p> <p><b>ANSWER:</b> <b>As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.</b></p> <p>10. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.</p> <p><b>ANSWER:</b> <b>As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.</b></p> <p>11. State whether your eligibility for the program was conditional on one or more of the following criteria:</p> <ul style="list-style-type: none"><li>a) whether or not your business exports or has increased its exports;</li><li>b) the use of domestic rather than imported inputs;</li><li>c) the industry to which your business belongs; or</li><li>d) the region in which your business is located.</li></ul> <p><b>ANSWER:</b></p>	
---	--

**FOR PUBLIC RECORD**

<p><b>As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.</b></p> <p>12. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.</p> <p><b>ANSWER:</b> <b>The company used the loans to purchase raw materials for the production of Cold-rolled coils, GI coils and Colour collated coils etc.</b></p> <p><b>As indicated above, the company got the loan from private business bank, therefore, the company didn't receive subsidy from the loan.</b></p> <p>13. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.</p> <p><b>ANSWER:</b> <b>As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.</b></p> <p>14. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.</p> <p><b>ANSWER:</b> <b>As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.</b></p> <p>15. To your knowledge, does the program still operate or has it been terminated?</p> <p><b>ANSWER:</b> <b>As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.</b></p> <p>16. If the program has been terminated, please provide details (including when and why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program? If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part I-4.4 in relation to this programme.</p> <p><b>ANSWER:</b> <b>As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.</b></p>	
Exporter's declaration	
Non-confidential version of this response	<input checked="" type="checkbox"/>

**FOR PUBLIC RECORD**

<b>Attachments</b>	<b>Please tick if you have provided spreadsheet</b>
B-2 Australian sales	<input type="checkbox"/>
B-4 Upwards sales	<input type="checkbox"/>
B-5 Upwards selling expenses	<input 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	<input checked="" type="checkbox"/>
I-3 Income Tax	<input checked="" type="checkbox"/>
I-4 Grants	<input type="checkbox"/>
I-5 VAT and tariff transactions	<input type="checkbox"/>
I-6.1 Other programs	<input type="checkbox"/>
I-6.2 Loans	<input checked="" type="checkbox"/>

## GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

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

### Full description of the goods the subject of the application

In relation to **China, Korea and Taiwan**, the goods description is:

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

and

Flat rolled iron or steel products containing alloys of a width less than 600mm and, equal to or greater than 600mm, plated or coated with zinc exported from:

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

and

In relation to **India, Malaysia and Vietnam**, the goods description is:

Flat rolled iron and steel products (whether or not containing alloys) that are plated or coated with zinc exported to Australia from India, Malaysia and Vietnam. Galvanised steel of any width is included.

### Further information

The amount of zinc coating on the steel is described as its coating mass and is nominated in grams per meter squared (g/m<sup>2</sup>) with the prefix being Z (Zinc) or ZF (Zinc converted to a Zinc/Iron alloy coating). Common coating masses used for zinc coating are: Z350, Z275, Z200, Z100, and for zinc/iron alloy coating are: ZF100, ZF80 and ZF30 or equivalents based on international standards and naming conventions.

The Commission understands from previous inquiries that trade and other names often used to describe galvanised steel include:

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

The goods description includes galvanised steel whether or not including any (combination of) surface treatment, for instance; whether passivated or not passivated, (often referred to as chromated or unchromated), oiled or not oiled, skin passed or not skin passed, phosphated or not phosphated (for zinc iron alloy coated steel only).

Painted galvanised steel, pre-painted galvanised steel, electro-galvanised plate steel and corrugated galvanised steel are not subject to the measures.

**FOR PUBLIC RECORD**

<b>Tariff classification</b>
<p>The goods are generally, but not exclusively, classified to the following tariff classifications in Schedule 3 of the <i>Customs Tariff Act 1995</i>:</p> <ul style="list-style-type: none"> <li>• 7210.49.00 statistical code 55, 56, 57 and 58;</li> <li>• 7212.30.00 statistical code 61;</li> <li>• 7225.92.00* statistical code 38*</li> <li>• 7226.99.00* statistical code 71*</li> </ul> <p>*These tariff subheadings only apply to: (1) All exporters from India, Malaysia and Vietnam, (2) Angang Steel Co. Ltd (China); (3) Benxi Iron and Steel (Group) International Economic and Trading Co. (China); and (4) Yieh Phui Enterprise Co. Ltd (Taiwan).</p>

**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.

<b>Item</b>	<b>Category</b>	<b>Sub-Category</b>	<b>Identifier</b>	<b>Sales Data</b>	<b>Cost Data</b>	<b>Key category</b>
1	Alloy content	Alloy	A	Mandatory	Not applicable	YES
		Non-alloy	NA			
2	Prime	Prime	P	Mandatory	Not applicable	YES
		Non – Prime	N			
3	Steel Base	Hot Rolled	H	Mandatory	Mandatory	YES
		Cold Rolled	C			
4	Coating Type	Zinc Coated (Z)	Z	Mandatory	Mandatory	YES
		Zinc / Iron Alloy Coating (ZF / F)	F			
5	Coating Mass	<= 100 g/m2	1	Mandatory	Mandatory	YES
		>100 g/m2 to <= 220 g/m2	2			
		> 220 g/m2 to <= 300g/m2	3			
		>Z300 g/m2 to <= 400 g/m2	4			
		>400 g/m2	5			
6	Steel Grade	G2 / SGCC / SGHC	A	Mandatory	Mandatory	YES
		G3 / SGCD	B			
		G250 / SGC 340 / SGHC 340 / SGC 340 / SGHC 340	C			
		G300 / G350 / SGC 400 / SGHC 400 / SGC 440 / SGCH 440 / SGC 490 / SGHC 490	D			
		G450 / G500	E			
		G550 / SGC 570	F			
		Other	G			
7	Base Metal Thickness	< 0.40 mm	1	Mandatory	Mandatory	YES
		=> 0.40 mm to < 0.50 mm	2			
		=> 0.50 mm to < 0.75 mm	3			
		=> 0.75 mm to < 1.00 mm	4			
		=> 1.00 mm to < 1.50 mm	5			
		=> 1.50 mm to < 2.00 mm	6			
		=> 2.00 mm to <2.50 mm	7			
		=> 2.50 mm	8			
8	Width	< 600 mm	A	Mandatory	Optional	No
		=> 600 mm to <= 1220mm	B			
		> 1220mm	C			
9	Form	Coil	C	Mandatory	Optional	No
		Sheet	S			



**FOR PUBLIC RECORD**

In constructing a MCC, use a "-" between each category. For example: **A-P-C.....**

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

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

## SECTION A COMPANY INFORMATION

### A-1 Company representative and location

1. Please nominate a contact person within your company:

**Name:** Mr. Yaolong Zhang  
**Position in the company:** Manager  
**Address:** No. 1 Baiyang Road, Chongwen Street Office, Guan County, Liaocheng, ShanDong China  
**Telephone:** +86 13963515221  
**E-mail address of contact person:** xu.5288@163.com

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

**Name:** Tao Wang  
**Address:** Room 916,09/F,Office Tower2,Kunsha Center,No.16 Xinyuanli,Chaoyang District, Beijing 100027, P.R.China.  
**Telephone:** +86-13501092768  
**E-mail address:** [wangtao@rayyinlawyer.com](mailto:wangtao@rayyinlawyer.com) / [zhoulei@rayyinlawyer.com](mailto:zhoulei@rayyinlawyer.com)

*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.

**ANSWER:**  
**Financial records of the company are held at No. 1 Baiyang Road, Chongwen Street Office, Guan County, Liaocheng, ShanDong China.**

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

### A-2 Company information

1. What is the legal name of your business?

**ANSWER:**  
**The legal name of the company is Guanxian Hongshun Composite Material Co., Ltd. ("Hongshun" or "the company"), and the company type, according to Chinese corporation laws, is an "Other Limited Liability Corporation".  
There are no other names being used when export and/or sell goods.**

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

**ANSWER:**  
**Not applicable, the company doesn't trade under different name or brand.**

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

**ANSWER:**  
**Not applicable, the company was not ever known by a different legal or trading name.**

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

**ANSWER:**  
**Mr. Yaolong Zhang, General Manager and Executive director was the sole director and shareholder during the period (In November 2018, shareholders changed from Mr. Yaolong Zhang, Mr. Peihua Zhang, Mr. Ruimin Wang, Mr. Xijun Zhang and Mr. Zhiwei Zhang to Mr.Yaolong Zhang).**

**There are no changes for the board of directors in the last two years.**

5. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint-ventures)? If yes, provide:
- (a) A diagram showing the complete ownership structure; and
  - (b) A list of all related companies and its functions

**ANSWER:**

**Not applicable, the company is not part of a group.**

6. Is your company or parent company publicly listed?  
If yes, please provide:
- (a) The stock exchange where it is listed; and
  - (b) Any principle shareholders<sup>1</sup>
- If no, please provide:
- (a) A list of all principal shareholders and the shareholding percentages.

**ANSWER:**

**Not applicable, the company is not publicly listed company.**

7. What is the overall nature of your company's business? Include details of the products that your company manufacture and sell and the market your company sells into.

**ANSWER:**

**The company is producer of different kinds of steel coils, specifically, the company maintains the production line for cutting coils, and consigned the production of subject goods by other manufacturers.**

**The company only made domestic sales of the subject goods.**

8. If your business does not perform all of the following functions in relation to the goods under consideration, then please provide names and addresses of the companies which perform each function:
- (a) produce or manufacture;
  - (b) sell in the domestic market;
  - (c) export to Australia; and
  - (d) export to countries other than Australia.

**ANSWER:**

**The company is producer of different kinds of steel coils, specifically, the company maintains the production line for cutting coils, and consigned the production of subject goods by other manufacturers.**

**The company is a producer of the subject goods, and make sales of the subject goods in domestic market during period of review.**

**During period of review, the company didn't make exports of the subject goods.**

9. Provide your company's internal organisation chart.

**ANSWER:**

**Please refer to Appendix A-2.9 Organization Chart.**

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

---

<sup>1</sup> 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.

**ANSWER:**

Please refer to Appendix A-2.9 Organization Chart.

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

**ANSWER:**

**Not applicable, the company doesn't produce brochures, pamphlets or other promotional material.**

### **A-3 General accounting information**

1. What is your financial accounting period?

**ANSWER:**

**Financial accounting period is from 1<sup>st</sup> January to 31<sup>st</sup> December.**

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

**ANSWER:**

**The company's financial accounts are audited by Guanxian Shuofeng Accounting Firm.**

3. What currency are your accounts kept in?

**ANSWER:**

**The accounts of the company are kept in RMB.**

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

**ANSWER:**

**Financial accounting system used by the company is UFIDA.**

5. What is the name of your sales system?

**ANSWER:**

**Sales system used by the company is UFIDA.**

6. What is the name of your production system?

**ANSWER:**

**Production system used by the company is UFIDA.**

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

**ANSWER:**

**The company's accounting, sales and production systems are same and integrated system.**

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

**ANSWER:**

**Accounting practices are fully in line 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.

**ANSWER:**

**Negative, there have been no changes to the company's accounting practices.**

## **A-4 Financial Documents**

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

**ANSWER:**

**Please refer to Appendix A-4.1 Financial Statements.**

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

**ANSWER:**

**Please refer to Appendix A-4.2 Tax Returns.**

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

**ANSWER:**

**Not applicable, the company doesn't maintain different profit centres.**

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

**ANSWER:**

**Please refer to Appendix A-4.4 Income Statements.**

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

**ANSWER:**

**Please refer to Appendix A-4.5 Trial Balances.**

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

**ANSWER:**

**Please refer to Appendix A-4.6 Chart of Accounts.**

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

## SECTION B EXPORT SALES TO AUSTRALIA

### NOTE

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

### ANSWER:

**This section is not applicable, since the company didn't make direct exports to Australia during period of review.**

### 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
2. In what currency do you invoice your customers for goods exported to Australia? If it is not in your local currency:
  - (a) Do your customers pay you into a foreign currency denominated account? If yes, provide details;
  - (b) Do you use forward contracts to lock in the foreign exchange rate relating to the export sales? If yes, provide details;
  - (c) How is the exchange rate determined in your accounting system and how often is it updated?
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.
4. If sales are in accordance with price lists or price extras list, provide copies of these lists.
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.
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.
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.
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?

## 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.
  - This worksheet must also include exports of the goods that have been exempted from anti-dumping duties under 8(7) and section 10(8) of the *Customs Tariff (Anti-Dumping) Act 1975*.
  - If you have claimed in B-1.8 that the date of sale is one other than the invoice date, then add the sales within your claimed date of sale.
  - You must provide this list in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.
  - If there are any direct selling expenses incurred in respect of the exports to Australia not listed in the spreadsheet, add a column. For example, if the delivery terms make you responsible for arrival of the goods at an agreed point within Australia (e.g. delivered duty paid), insert additional columns in the spreadsheet for all other costs incurred.
2. Provide a table listing the source of the data for each column in the "B-2 Australian sales" listing.

## B-3 Sample export documents

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

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

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

## 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.
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.
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.

## **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.
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.



## 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.

**ANSWER:**

**Not applicable, the company didn't make exports to Australia during period of review.**

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

**ANSWER:**

**Not applicable, the company didn't make exports to Australia during period of review.**

### 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.

**ANSWER:**

**The company sold in domestic market similar products which are Zinc coated steel coils, with thickness 0.27~6.0 mm, width 333~1500 mm, which are produced with hot rolled steel coils or cold rolled steel coils, coated with zinc.**

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.

**ANSWER:**

**MCCs for goods sold domestically are as following:**

A-P-C-Z-1-A-1-B-C	A-P-C-Z-1-A-6-C-C	A-P-C-Z-2-A-3-B-C	A-P-H-Z-1-C-7-B-C
A-P-C-Z-1-A-2-A-C	A-P-C-Z-1-B-2-B-C	A-P-C-Z-2-C-5-B-C	A-P-H-Z-1-C-7-C-C
A-P-C-Z-1-A-2-B-C	A-P-C-Z-1-B-2-C-C	A-P-C-Z-2-D-5-B-C	A-P-H-Z-1-C-8-B-C
A-P-C-Z-1-A-2-C-C	A-P-C-Z-1-B-3-B-C	A-P-C-Z-2-D-6-B-C	A-P-H-Z-1-C-8-C-C
A-P-C-Z-1-A-3-B-C	A-P-C-Z-1-B-3-C-C	A-P-C-Z-3-A-5-B-C	A-P-H-Z-1-D-8-B-C
A-P-C-Z-1-A-3-C-C	A-P-C-Z-1-C-5-B-C	A-P-C-Z-3-C-7-C-C	A-P-H-Z-1-G-8-C-C
A-P-C-Z-1-A-4-B-C	A-P-C-Z-1-C-6-C-C	A-P-C-Z-3-D-6-B-C	A-P-H-Z-3-C-8-C-C
A-P-C-Z-1-A-5-B-C	A-P-C-Z-1-C-7-C-C	A-P-C-Z-3-D-6-C-C	
A-P-C-Z-1-A-5-C-C	A-P-C-Z-2-A-2-B-C	A-P-H-Z-1-A-8-C-C	

### 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.

**FOR PUBLIC RECORD**

- (b) Provide details on how you mapped the product or SKU codes to the MCC for the purpose of completing this questionnaire.
- (c) Provide a table of showing the product or SKU codes for each MCC.

If no:

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

**ANSWER:**

**(a) For the explanations regarding the product codes of the company, please refer to Appendix C-3.1 Product Codes Explanations.**

**(b) Product codes could not be used to identify the every MCC, therefore, the company identifies the MCC manually by the sales department based on sales contracts and invoices.**

**(c) For reconciliation between product codes with MCC, please refer to Appendix C-3.2 Product Codes With MCC.**

## SECTION D DOMESTIC SALES

### D-1 Domestic sales process

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

**ANSWER:**

**Generally, the company got to know the clients by business visits or introduced by its old clients.**

**Sales prices and sales terms are negotiated between the salesman of the company and the clients. If sales terms agreed, the company will sign the contract with the clients, in the meantime, the company will arrange the manufacturer to produce the goods.**

**Most of the clients are required to make payments after the contract and before the production, once the production is completed, the company will notify the clients to pick up the goods to the manufacturer's premises.**

**Normally, the invoices are issued after the delivery of the goods, and the company will pay the manufacturing fee against the manufacturing overhead invoices after the complete of the production.**

**Lead time from the contact to delivery of the goods at least takes one month.**

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

**ANSWER:**

**Not applicable, the company didn't make sales to related clients.**

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

**ANSWER:**

**Not applicable, the company doesn't use price lists.**

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

**ANSWER:**

**Not applicable, domestic selling prices doesn't vary according to the distribution channel.**

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

**ANSWER:**

**Not applicable, the company didn't grant on-invoice discounts or off-invoice rebates.**

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

**ANSWER:**

**Not applicable, the company doesn't issue credit or debit notes to the customer.**

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?

**ANSWER:**

**Not applicable, the company use invoice dates as dates of sales.**

## **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.

**ANSWER:**

**Please refer to Appendix D-2 Domestic Sales.**

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

**ANSWER:**

**Sales information reported in the Appendix D-2 are sourced from Sales contract and sales invoices and financial 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

**ANSWER:**

**Please refer to Appendix D-3.1 Sample Domestic Sales Documents.**

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

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

**ANSWER:**

**Please refer to Appendix D-3.2 Domestic Sales Documents Reconciliation.**

## D-4 Reconciliation of sales to financial accounts

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

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

**ANSWER:**

Please refer to Appendix B-4 Upwards Sales.

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.

**ANSWER:**

Please refer to Appendix B-4.2 Supporting Documents For B-4.

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.

**ANSWER:**

Please refer to Appendix B-4 Upwards Sales.

## SECTION E DUE ALLOWANCE

### E-1 Credit expense

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

**ANSWER:**

**In domestic sales, the clients are normally required to make the payment in advance, therefore, the company doesn't claim credit to domestic customers.**

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

**ANSWER:**

**Not applicable, the company didn't make sales to Australia during the period of review.**

### E-2 Packaging

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

**ANSWER:**

**Packaging materials used by the company include Plastic film, Rustproof paper, Steel sheet, End shields.**

**In the company's cost accounting practices, the packaging costs are included in the cost of production, namely data of Cost to make and sell, therefore, it is not necessary to claim the adjustment of packaging cost.**

### **E-3 Delivery**

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

**ANSWER:**

**Not applicable, the company made sales in domestic sales based on EXW terms.**

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

**ANSWER:**

**Not applicable, the company didn't make sales to Australia during period of review.**

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

**ANSWER:**

**Not applicable, the company didn't make sales to Australia during period of review.**

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

**ANSWER:**

**Not applicable, the company didn't make sales to Australia during period of review.**

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

**ANSWER:**

**Not applicable, the company didn't make sales to Australia during period of review.**

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

**ANSWER:**

**Not applicable, the company didn't make sales to Australia during period of review.**

### **E-4 Other direct selling expenses**

1. Do you provide sales commissions for domestic sales of like goods and/or export sales of the goods? If yes, provide details.

**ANSWER:**

**Not applicable, the company doesn't grant commissions for domestic sales or export sales.**

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

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

**ANSWER:**

**The company didn't make export sales, the VAT rate for domestic sales of subject goods and VAT refund rate for exports changed during the period of review as following:**

<b>Period</b>	<b>VAT (%)</b>	<b>REFUNDED VAT (%)</b>
<b>Before 31<sup>st</sup> October 2018</b>	<b>16%</b>	<b>13%</b>

**FOR PUBLIC RECORD**

<b>From 1<sup>st</sup> October 2018 to 31<sup>st</sup> March 2019</b>	<b>16%</b>	<b>16%</b>
<b>From 1<sup>st</sup> April 2019</b>	<b>13%</b>	<b>13%</b>

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

**ANSWER:**

**Not applicable, there are no other direct selling expenses.**

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

**ANSWER:**

**Not applicable, the company didn't make export sales.**

### **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.

**ANSWER:**

**Negative, there are no other adjustments.**



## SECTION F THIRD COUNTRY SALES

### F-1 Third country sales process

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

**ANSWER:**

**Not applicable, the company didn't make third country sales.**

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

**ANSWER:**

**Not applicable, the company didn't make 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?

**ANSWER:**

**Not applicable, the company didn't make third country sales.**

### F-2 Third country sales listing

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

**ANSWER:**

**Not applicable, the company didn't make third country sales.**

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

**ANSWER:**

**Not applicable, the company didn't make third country sales.**

### F-3 Differences in sales to third countries

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

**ANSWER:**

**Not applicable, the company didn't make third country sales.**

## SECTION G COST TO MAKE AND SELL

### G-1. Production process

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

**ANSWER:**

**The company doesn't maintain the production facilities, but for the production of the subject goods, please refer to Appendix G-1 Production Process.**

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

**ANSWER:**

**Not applicable, no suppliers are related to the company.**

### G-2. Cost accounting practices

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

**ANSWER:**

**The company'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.

**ANSWER:**

**Not applicable, the company's cost accounting system is based on actual costs.**

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

**ANSWER:**

**Not applicable, the company doesn't use cost centres.**

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

**ANSWER:**

**The company accounts cost of production based on product codes, please refer to the explanations regarding the product codes in Appendix C-3.1.**

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

**ANSWER:**

**Not applicable, there are no costs for management accounting purposes valued differently to financial accounting purposes.**

6. Has your company engaged in any start-up operations in relation to the goods? If yes:

## FOR PUBLIC RECORD

- (a) Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.
- (b) State the total cost of the start-up operation and the way that your company has treated the costs of the start-up operation in its accounting records.

**ANSWER:**

**Not applicable, the company was not involved in the start-up operations in relation to the goods.**

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

**ANSWER:**

**The company uses Weight average method to value the raw material, and finished goods.**

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

**ANSWER:**

**The company does not separate costs for prime goods and sub-standard goods, from the other side, the company doesn't allocate cost for damaged goods.**

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

**ANSWER:**

**The company sold out scrap generated from the production process, and doesn't account cost for scrap.**

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

**ANSWER:**

**Not applicable, there are no management fees / corporate allocate allocations charged to the company.**

### **G-3 Cost to make on domestic market**

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

**ANSWER:**

**Please refer to Appendix G-3 Domestic CTM.**

**Note:**

**1. The company's cost is not accounted based on MCC, but on product codes, therefore, the company can only report the Cost to make and sell based on product codes;**

2. The company doesn't separate cost by destination market, therefore Appendix G-3 covers cost to make and sell for all the goods produced during the period, whether the goods are destined to domestic market or international markets.

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

**ANSWER:**

The cost of the company is calculated directly by its cost accounting system.

## **G-4 Selling, General & Administration expenses**

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

**ANSWER:**

Please refer to Appendix G-4.1 SG&A Listing.

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

**ANSWER:**

Please refer to Appendix G-4.2 Domestic SG&A Calculation.

## **G-5 Cost to make the goods exported to Australia**

1. Complete the worksheet named "G-5 Australian CTM".
  - This worksheet lists the quarterly cost to make the Australian models of the goods under consideration by MCC manufactured within the period.
  - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
  - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
  - You must provide this list in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.
  - If you have claimed in B-1.8 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all Australian sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.

**ANSWER:**

Not applicable, the company doesn't make direct Australian sales.

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

**ANSWER:**

The cost of the company is calculated directly by its cost accounting system.

## **G-6 Cost allocation methodology**

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

**ANSWER:**

(a) **Cost of steel: Actual cost, cost for steel actually used.**

(b) **Labour and Manufacturing overheads: The company didn't have labour and manufacturing costs, but account manufacturing cost based on manufacturing invoices, and the manufacturing invoices are allocated standard consumption rate determined for each specification.**

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

**ANSWER:**

**The company's cost accounting system is calculated by the system itself, and generated by the system at the end of each accounting period.**

**Total cost for each costing factor (Material cost, Manufacturing cost) could be reconciled with total cost of all products.**

## **G-7 Major raw material costs**

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

**ANSWER:**

**Major materials used in the manufacture of the goods are hot rolled steel coil.**

3. 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.

**ANSWER:**

**Not applicable, the hot rolled steel coils are purchased by the company from unrelated suppliers.**

4. 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.

**ANSWER:**

**As indicated previously, the company's cost are calculated by the system, and all materials are calculated and allocated together, and it is not possible to get cost for each kind of material consumed, in this regard, the company managed to separate the cost of major material, cost of steel coils from the total cost to make, please refer to Appendix G-3 Domestic CTM.**

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

**ANSWER:**

Please refer to Appendix G-7.4 Raw Material Purchases.

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

**ANSWER:**

Source of the data for G-7.4 are purchase invoices issued by the suppliers.

7. 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.

**ANSWER:**

Please refer to Appendix G-7.6(a) Sample Purchase Invoices.

**Note:**

1. Payment for purchase of invoices are not made exactly against invoices, but in a rolling method, therefore, it is not possible to find the payment proof for any specific purchase invoice.

2. Registry of purchase of materials are entered into the system with accounting system invoice number for digit invoices, not VAT invoice number, and the company doesn't record the VAT invoice number in normal accounting practice, therefore, the company selects the two largest value based on system invoice number, and provide the screenshot of the digital invoice in the accounting system.

8. 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.

**ANSWER:**

Not applicable, no suppliers are related to the company.

## **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.

**ANSWER:**

Please refer to Appendix G-8 Upward Costs.

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

**ANSWER:**

Please refer to Appendix G-8.2 Upward Costs Supporting Documents.

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

**ANSWER:**

Please refer to Appendix G-8 Upward Costs.

## **G-9 Capacity Utilisation**

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

**ANSWER:**

Please refer to Appendix G-9 Capacity Utilisation.

## SECTION H PARTICULAR MARKET SITUATION

### H-1 Reporting requirements

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

**ANSWER:**

**The company is a small private company, and its normal interaction with the Government of China includes the following:**

- **Applying the Business license and Foreign trade entity export record**
- **Filing the monthly financial statements, VAT tax returns, paying VAT taxes and additional taxes if any;**
- **Filing the quarterly income tax returns and paying corporate income taxes.**

**As a private company, there is no representation from any levels of the government and the company does the business based on decisions of the Board of directors and Board of shareholders.**

### H-2 Business structure, ownership and management

16. 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 Government of China (GOC) (either through direct ownership or through association).

**ANSWER:**

**Not applicable, the company is a small private company.**

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

**ANSWER:**

**The company only has one Executive director, Mr. Yaolong Zhang during the period, and for shareholders, in November 2018, shareholders changed from [CONFIDENTIAL INFORMATION regarding the changes of the directors].**

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

**ANSWER:**

**Not applicable, the company didn't have related businesses.**

19. 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,



**FOR PUBLIC RECORD**

including SASAC)? If yes, identify the individuals, their role on that Board and their affiliation with the Government of China.

**ANSWER:**

**Not applicable, there are no members of the company 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**

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

**ANSWER:**

**Not applicable, the company's Board of Directors or Board of Shareholders doesn't have representatives from the Chinese Communist Party (CCP)**

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

**ANSWER:**

**Not applicable, there are no such members.**

22. 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).

**ANSWER:**

**Mr. Yaolong Zhang is the sole shareholder of the company, who is the executive director of the company.**

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

**ANSWER:**

**The company only has one Executive director, Mr. Yaolong Zhang during the period, and for shareholders, in November 2018, shareholders changed from [CONFIDENTIAL INFORMATION regarding the changes of the directors].**

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

**ANSWER:**

**Not applicable, there are no such positions.**

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

**ANSWER:**

**As far as the company knows, there are no such requirements.**

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

**ANSWER:**

**Not applicable, the company is a private company.**

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

**ANSWER:**

**Not applicable, the company is a small private company.**

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

**ANSWER:**

**Normally, board of shareholders and board of directors have full power to reward, fire or discipline your business' senior managers**

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

**ANSWER:**

**Not applicable, the company's senior managers don't hold any positions in any Government of China departments or organisations, associations or Chambers of Commerce.**

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

**ANSWER:**

**Not applicable, the company didn't have pricing committee, the prices are determined by the Executive director, Mr. Yaolong Zhang.**

### **H-3 Licensing**

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

**ANSWER:**

**Please refer to Appendix H-3.1 Business License.**

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

**ANSWER:**

**Guan County Market Supervision Administration**

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

**ANSWER:**

**Normal procedure for applying the license:**

- 1. Applying preapproval of Company name to government;**
- 2. Renting a house as company address;**
- 3. Submitting Articles of Association for the company;**
- 4. Claiming Letter of bank inquiry from CPA;**
- 5. Opening bank account of the company;**
- 6. Claiming Capital verification report;**
- 7. Registering company before government;**

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

**ANSWER:**

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

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

**ANSWER:**

**The company could operate under business scope indicated in the Business license, please refer to Appendix H-3.**

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

**ANSWER:**

**If the company acts outside the scope of business license, the registration authority shall caution, impose a fine, confiscate illegal gains, order the company to stop doing business for internal rectification, withhold or even revoke the business license according to specific circumstances.**

**In the other side, the company could apply for adding the business scope, then we could act according to the new business scope.**

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

**ANSWER:**

**Under the business license, the company could operate legally. In China, if someone do business without a business license, the department of administration for industry and commerce will ban it and confiscate illegal gains.**

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

**ANSWER:**

**The business license could be revoked under the following circumstances:**

- (1) The company is declared bankrupt as provided by law;**
- (2) pursuant to the provisions of the company's articles of association, the term of operation of the company expires, or one of the other events which are grounds for dissolution occurs;**
- (3) A resolution of dissolution is passed by the shareholders;**
- (4) dissolution is necessary due to a merger or division of the company; or**
- (5) the company is ordered to close down in accordance with law.**

#### **H-4 Decision-making, planning and reporting**

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

**ANSWER:**

**The company is private company, the Executive director of the company are responsible to make decisions of the company, including production, sales, distribution of profits.**

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

**ANSWER:**

**Not applicable, the company is a private company, none of any levels of government of China are involved in the company's business or management.**

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

**ANSWER:**

**Not applicable, the company is a private company, none of any levels of government of China are involved in the company's business or management.**

**FOR PUBLIC RECORD**

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

**ANSWER:**

**Not applicable, the company is a small private company, which are not required to submit reports to the Government of China.**

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

**ANSWER:**

**Not applicable, the company is a private company, which doesn't have such documents.**

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

**ANSWER:**

**Not applicable, the company didn't have five-year plans.**

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

**ANSWER:**

**Not applicable, the company didn't hold Board of directors and Board of shareholders meetings during the period.**

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

**ANSWER:**

**Pricing decisions on the goods under consideration are made by Executive director of the company, Mr. Yaolong Zhang based on its judgement over material prices and the market situation, and there are no company meetings involved.**

## **H-5 Financial and investment activities**

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

**ANSWER:**

**Please refer to Appendix I-6.2 Loans.**

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

**ANSWER:**

**Please refer to Appendix I-6.2 Loans.**

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

**ANSWER:**

**Please refer to Appendix I-6.2 Loans.**

10. Has your business raised any capital using issuance of shares, preferential shares, rights issue, bonds, warrants, debentures, sub-ordinate loans or any other debt and/or equity instruments in the last 5 years? If yes:

- a. explain what instruments were used;
- b. identify the type (e.g., government guarantee) and provider of the security; and

- c. explain the reasons for raising the capital.

**ANSWER:**

**Not applicable, the company didn't raise any capital using ways described in the question.**

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

**ANSWER:**

**Not applicable, the company has no such policies.**

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

**ANSWER:**

**Not applicable, the company didn't make such investments.**

## H-6 Government policy on the industry

6. 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:
- copy of the documentation and a translation in English;
  - documentation concerning the Government of China or any association of the Government of China's notification of the measures concerning the goods to your company during the period.

**ANSWER:**

**The company is a private company which has no access to such information.**

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

**ANSWER:**

**The company is a private company which has no access to such information.**

8. Describe any role your company plays in the development of government's industrial plans and/or policies at all levels of government. For example, does your company provide information for, or request inclusion in, any plans, policies, or measures?

**ANSWER:**

**Not applicable, the company didn't play role in the development of government's industrial plans or policies.**

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

**ANSWER:**

**The company is a private company which has no access to such information.**

10. 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.
- Explain the purpose of these designations, the criteria for receiving any such designation, and the benefits or obligations that arise from each such designation.
  - Is there any connection between these designations and five-year plans or other industrial and/or economic policies or administrative measures?
  - Describe any instances in which your company cited Government of China plans, policies, or measures as support for receiving the financing that you report.

**ANSWER:**

**Not applicable, the Government of China didn't grant the company such titles.**

## **H-7 Taxation**

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

**ANSWER:**

**There are no export taxes on exports of the goods during the period.**

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

**ANSWER:**

**Please refer to Appendix H-7.3 VAT Rebate And Government Notices.**

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

**ANSWER:**

**Please refer to Appendix H-7.3 VAT Rebate And Government Notices.**

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

**ANSWER:**

**None.**

## **H-8 Sales terms**

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

**ANSWER:**

**Mr. Yaolong Zhang, the Executive director, is the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by the company.**

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

**ANSWER:**

**Mr. Yaolong Zhang, the Executive director, is the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by the company.**

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

**ANSWER:**

**Not applicable, the company doesn't coordinate the selling prices or supply of the goods with other domestic producers or any Government of China departments.**

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

**ANSWER:**

**As a small private company, the company is not required to provide information or data to the Government of China.**

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

**ANSWER:**

**As a private company, the company doesn't provide data to any other person.**

## H-9 Industry associations

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

**ANSWER:**

**Not applicable, the company is not a member of industry associations.**

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

**ANSWER:**

**Not applicable, the company is not a member of industry associations.**

## H-10 Statistics submission/recording

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

**ANSWER:**

**Not applicable, the company doesn't make submissions to the Chinese Bureau of Statistics or any other government organization.**

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

**ANSWER:**

**Not applicable, the company doesn't make submissions to the Chinese Bureau of Statistics or any other government organization.**

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

**ANSWER:**

**Not applicable, the company doesn't make submissions to the Chinese Bureau of Statistics or any other government organization.**

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

**ANSWER:**

**Not applicable, the company doesn't make submissions to the Chinese Bureau of Statistics or any other government organization.**

## H-11 Production/output

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

**ANSWER:**

**Not applicable, the company, as a private company, is not subject to any national/regional industrial policy or guidance.**

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

**ANSWER:**

**Not applicable, the company doesn't respond to the policies/guidelines.**

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

**ANSWER:**

**Not applicable, there are no other restrictions to the sale of the goods or like goods imposed by the Government of China.**

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

**ANSWER:**

**Please refer to the spreadsheet "List of Clients" in the Appendix D-2.**

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

**ANSWER:**

**Not applicable, there are no restrictions or conditions in relation to the quality or quantity of the production of the goods placed upon our company.**

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

**ANSWER:**

**Chinese companies are required apply the Foreign Trade Company License Record Form before making exports.**

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

**ANSWER:**

**Not applicable, there are no such restrictions.**



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

**ANSWER:**

**Not applicable, there are no other restrictions.**

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

**ANSWER:**

**Not applicable, there are no changes for the company production capacity over the last 5 years.**

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

**ANSWER:**

**Not applicable, there are no such concessions.**

## H-12 Sales price

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

**ANSWER:**

**Not applicable, the company was not subject to any direct or indirect price guidance or controls by the Government of China during the period.**

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

**ANSWER:**

**Not applicable, the company was not subject to any direct or indirect price guidance or controls by the Government of China during the period.**

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

**ANSWER:**

**Not applicable, the company didn't encounter price guidance or controls established by regional, provincial or special economic zone officials and/or organisations.**

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

**ANSWER:**

**The selling prices of the goods are determined by Mr. Yaolong Zhang, the Executive director of the company during the review.**

**There are no restrictions, limitations, or other consideration imposed on the company.**

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

**ANSWER:**

**As far as the company knows, the selling prices are determined by prices of raw materials and market situation, there are no such organization / business entity.**

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

**ANSWER:**

**Not applicable, the company doesn't have pricing committee.**

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

**ANSWER:**

**Not applicable, the company doesn't have pricing committee.**

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

**ANSWER:**

**The selling prices of the goods are determined by Mr. Yaolong Zhang, the executive director of the company.**

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

**ANSWER:**

**Not applicable, the company's production of facility is only located in Shandong province.**

### **H-13 Adding capacity and/or joint ventures**

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

**ANSWER:**

**As far as the company knows, adding capacity shall submit duly evaluation on the Environmental protection, Securities and land use to government of China.**

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

**ANSWER:**

**The company doesn't know the relevant information.**

### **H-14 Raw materials**

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

**ANSWER:**

**Not applicable, the company didn't have related or affiliated suppliers.**

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

**ANSWER:**

**Yes, the company identify the SIEs in the raw material purchase listings.**

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

**ANSWER:**

**Not applicable, the company purchased the whole raw materials domestically.**

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

**FOR PUBLIC RECORD**

**ANSWER:**

**Different suppliers have different prices due to product qualification, specifications etc, it is nearly impossible that different suppliers have same prices.**

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

**ANSWER:**

**The company purchase raw materials based on specifications required in the sales orders and prices of the raw materials, and the prices are generally determined the suppliers, and the company will select the suppliers with lowest prices.**

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

**ANSWER:**

**Not applicable, all raw materials are purchased domestically.**

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

**ANSWER:**

**The company sold the hot rolled steel coils, pickling coils, cold rolled steel coils in domestic market during the period of review.**

**The company sold the hot rolled steel coils to related and unrelated parties, the prices are determined according to market situation. There are no differences in selling prices between related and unrelated parties.**

## SECTION I COUNTERVAILING

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

Program No.	Program name
1	Preferential Tax Policies for Enterprises with Foreign Investment Established in the Coastal Economic Open Areas and Economic and Technological Development Zones
2	Preferential Tax Policies for Foreign Invested Enterprises– Reduced Tax Rate for Productive Foreign Invested Enterprises scheduled to operate for a period of not less than 10 years
3	Preferential Tax Policies for Enterprises with Foreign Investment Established in Special Economic Zones (excluding Shanghai Pudong area)
4	Preferential Tax Policies for Enterprises with Foreign Investment Established in Pudong area of Shanghai
5	Preferential Tax Policies in the Western Regions
6	Land Use Tax Deduction
7	Preferential Tax Policies for High and New Technology Enterprises
8	Tariff and value-added tax (VAT) Exemptions on Imported Materials and Equipments
9	One-time Awards to Enterprises Whose Products Qualify for ‘Well-Known Trademarks of China’ and ‘Famous Brands of China’
10	Matching Funds for International Market Development for Small and Medium Enterprises
11	Superstar Enterprise Grant
12	Research & Development (R&D) Assistance Grant
13	Patent Award of Guangdong Province
14	Innovative Experimental Enterprise Grant
15	Special Support Fund for Non State-Owned Enterprises
16	Venture Investment Fund of Hi-Tech Industry
17	Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment
18	Grant for key enterprises in equipment manufacturing industry of Zhongshan
19	Water Conservancy Fund Deduction
20	Wuxing District Freight Assistance
21	Huzhou City Public Listing Grant
22	Huzhou City Quality Award
23	Huzhou Industry Enterprise Transformation & Upgrade Development Fund
24	Wuxing District Public List Grant
25	Anti-dumping Respondent Assistance
26	Technology Project Assistance
27	Hot rolled steel provided by government at less than fair market value
28	Capital injections
29	Environmental protection grant
30	High and New Technology Enterprise Grant
31	Independent Innovation and High-Tech Industrialisation Program
32	VAT refund on domestic sales by local tax authority
33	Environmental Prize
34	Jinzhou District Research and Development Assistance Program

### I-1 General

2. Complete the worksheet named “I-1 Company turnover”
  - This worksheet is a table of the total company revenue over the period and split into:

- Total revenue for Australian sales, domestic sales and third country sales
- Revenue of the goods for Australian sales, domestic sales and third country sales
- You must provide this table in electronic format using the template provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.

**ANSWER:**

**Please refer to Appendix I-1 Company Turnover.**

## **I-2 Provision of goods at less than adequate remuneration**

The most recent reviews (Review 456 and 457) considered claims that public bodies (in the form of SOEs/ SIEs) were supplying hot rolled coil steel, coking coal and coke, directly or indirectly, to manufacturers of zinc coated (galvanised) steel and / or aluminium zinc coated steel at less than fair value. The following program were found to be countervailing:

- **Program 27:** Hot rolled steel provided by government at less than fair market value
6. Describe the nature of your production process for the goods, including an itemised list of all raw materials used by your company in the process.

**ANSWER:**

**Please refer to Appendix G-1 Production Process.**

7. Did your business or any company/entity related to your business receive any benefit under the above programs during the period? If yes, provide details.

**ANSWER:**

**The company is a private company and purchased all materials with fair value in the market, never received any profits.**

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

**ANSWER:**

**The company is a private company and purchased all materials with fair value in the market, never received any profits.**

9. Provide copies of all contractual agreements that detail the obligations of the State Invested Enterprise (SIE) and your business with reference to the granting and receipt of the assistance/benefits.

**ANSWER:**

**The company is a private company and purchased all materials with fair value in the market, never received any profits.**

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

**ANSWER:**

**Not applicable, the company didn't import raw materials.**

## **I-3 Preferential tax policies**

7. Complete the worksheet named "I-3 Income Tax"
- This worksheet is a table of your company's income tax liability over the last three financial years.
  - You must provide this table in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.

**FOR PUBLIC RECORD**

8. Did your business or any company/entity related to your business receive any benefit<sup>2</sup> under the following income tax programs during the review period (1 July 2018 to 30 June 2019):
- **Program 1:** Preferential Tax Policies for Enterprises with Foreign Investment Established in the Coastal Economic Open Areas and in Economic and Technological Development Zones
  - **Program 2:** Preferential Tax Policies for Foreign Invested Enterprises - Reduced Tax Rate for Productive Foreign Invested Enterprises scheduled to operate for a period not less than 10 years
  - **Program 3:** Preferential Tax Policies for Enterprises with Foreign Investment Established in Special Economic Zones (excluding Shanghai Pudong area)
  - **Program 4:** Preferential Tax Policies for Enterprises with Foreign Investment Established in Pudong area of Shanghai
  - **Program 5:** Preferential Tax Policies in the Western Regions
  - **Program 6:** Land Use Tax Deduction
  - **Program 7:** Preferential Tax Policies for High and New Technology Enterprises
  - **Program 8:** Tariff and value-added tax (VAT) Exemptions on Imported Materials and Equipments
  - **Program 32:** VAT refund on domestic sales by local tax authority
9. Provide a copy of your company's annual tax return for the last three financial years. If the documents are not in English, please provide a translation of the documents.

**ANSWER:**

**Please refer to Appendix I-3.3 Annual Tax Returns 2016-2018.**

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

**ANSWER:**

**Not applicable, the company didn't incur income tax over the last three financial years.**

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

**ANSWER:**

**General tax rate for enterprises are 25%.**

12. Did your company pay less than the general tax rate for enterprises referred to in question I-3.4? If yes:

- a. What tax rate did your company pay?
- b. Was the reduction in the tax paid or payable related to any of the preferential income tax programs in the table at the top of above?
- c. What is the name of the program?
- d. What is the name of the authority granting your company the reduced tax rate?
- e. What is the eligibility criteria to benefit from the reduced tax rate?
- f. Provide details of the application process
- g. Provide a copy of the blank application form. If the documents are not in English, please provide a translation of the documents.
- h. Provide a copy of your company's completed application form, including all attachments to the application form. If the documents are not in English, please provide a translation of the documents.
- i. Provide a copy of any confirmation or other correspondence from the authority approving your company for the reduction in tax rate. If the documents are not in English, please provide a translation of the documents.
- j. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.

---

<sup>2</sup> Refer to the Glossary of Terms for a definition of benefit in this context.

**ANSWER:**

**Not applicable, the company didn't pay income tax over the last three years.**

#### **I-4 Financial grants**

In the most recent reviews (Review 456 and 457), the Commission determined that subsidy benefits under the following countervailable subsidy programs have been received by Chinese exporters of the goods.

- **Program 9:** One-time Awards to Enterprises Whose Products Qualify for 'Well-Known Trademarks of China' and 'Famous Brands of China'
- **Program 10:** Matching Funds for International Market Development for small and medium size enterprises (SMEs)
- **Program 11:** Superstar Enterprise Grant
- **Program 12:** Research & Development (R&D) Assistance Grant
- **Program 13:** Patent Award of Guangdong Province
- **Program 14:** Innovative Experimental Enterprise Grant
- **Program 15:** Special Support Fund for Non-State-Owned Enterprises
- **Program 16:** Venture Investment Fund of Hi-Tech Industry
- **Program 17:** Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment
- **Program 18:** Grant for Key Enterprises in Equipment Manufacturing Industry of Zhongshan
- **Program 19:** Water Conservancy Fund Deduction
- **Program 20:** Wuxing District Freight Assistance
- **Program 21:** Huzhou City Public Listing Grant
- **Program 22:** Huzhou City Quality Award
- **Program 23:** Huzhou Industry Enterprise Transformation & Upgrade Development Fund
- **Program 24:** Wuxing District Public List Grant
- **Program 25:** Anti-dumping Respondent Assistance
- **Program 26:** Technology Project Assistance
- **Program 28:** Capital injection
- **Program 29:** Environmental protection grant
- **Program 30:** High and New Technology Enterprise Grant
- **Program 31:** Independent Innovation and High-Tech Industrialisation Program
- **Program 33:** Environmental Prize
- **Program 34:** Jinzhou District Research and Development Assistance Program

5. Complete the worksheet named "I-4 Grants"
- This worksheet is a table of the grants received by company over the period plus the two preceding years.
  - You must provide this table in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.

**ANSWER:**

**Not applicable, the company didn't have such grants.**

6. Provide a copy of your company's non-operating income and/or other business income ledgers, extracted directly from your accounting system, for the period covering the period plus the 2 preceding years.

**ANSWER:**

**Please refer to Appendix I-4.2 Non-operating Income Ledger.**

7. Did your company receive any grants (or any other financial contribution) from any level of government during the period plus the two preceding years?
- If yes:
- a. Were any of the grants related to any program listed in the table at the top of Section I above? If yes, identify the program.
  - b. Were any of the grants related to programs not listed in the table at the top of Section I above? If yes, provide the names of the programs.

**ANSWER:**

**Not applicable, the company didn't have any grants.**

8. For each of the grants listed in I-4.3:
  - a. What is the name of the grant?
  - b. What is the name of the authority providing the grant?
  - c. What is the eligibility criteria to receive the grant?
  - d. Is the grant directly related to the goods under consideration, export sales to Australia and/or export sales generally?
  - e. Provide details of the application process.
  - f. Provide a copy of the blank application form. If the documents are not in English, please provide a translation of the documents.
  - g. Provide a copy of your company's completed application form, including all attachments to the application form. If the documents are not in English, please provide a translation of the documents.
  - h. Provide a copy of any confirmation or other correspondence from the authority approving the grant. If the documents are not in English, please provide a translation of the documents.
  - i. Provide proof of payment of your company receiving the grant (e.g. bank statements).
  - j. Provide a copy of the accounting journal entries relating to the grant.
  - k. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the grant.

**ANSWER:**

**Not applicable, the company didn't have any grants.**

## **I-5 Tariff and VAT exemptions on imported materials and equipment**

It is the Commission's understanding that certain enterprises in China are eligible for exemption from the payment of import duty and import VAT under the following program:

- **Program 8:** Tariff and value-added tax (VAT) Exemptions on Imported Materials and Equipments

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

**ANSWER:**

**This section is not applicable, the company doesn't use imported materials and equipment.**

19. Please complete worksheet "I-5 VAT and tariff transactions".
20. Provide complete details involving the amount of the VAT refund received, including whether the refund was received in a lump sum or multiple instalments.
21. Describe the application and approval procedures for obtaining a benefit under the program.
22. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the GOC in relation to the program.
23. Outline the fees charged to or expenses incurred by your business in receiving the program.
24. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
25. State whether your eligibility for the program was conditional on one or more of the following criteria:



**FOR PUBLIC RECORD**

- a) whether or not your business exports internationally, or has increased its exports;
  - b) the use of domestic rather than imported inputs;
  - c) the industry to which your business belongs; or
  - d) the region in which your business is located.
26. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
27. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.
28. Indicate where benefits under this program can be found in your accounting system (i.e. specify the ledgers or journals) and financial statements.
29. Were the materials and/or equipment that were entitled to a refund of VAT used in the production of the goods during the investigation period? If yes, provide the following information:
- (e) type of inputs;
  - (f) cost of inputs;
  - (g) quantity of inputs; and
  - (h) amount of VAT refunded.
30. Has your company received exemption from payment of or refunds of import duty and import VAT for imported material inputs (e.g. hot rolled coil, coking coal and coke) at any time that were used in the production of the goods during the investigation period? If yes, provide the following information:
- (q) description of imported product;
  - (r) country of origin;
  - (s) quantity of imported product;
  - (t) purchase price;
  - (u) terms of purchase (e.g. FOB, CIF);
  - (v) ocean freight;
  - (w) value for duty of imported product;
  - (x) regular rate of taxes and duties;
  - (y) concessionary rate of taxes and duties;
  - (z) amount of duties and taxes normally applicable;
  - (aa) amount of duties and taxes paid;
  - (bb) amount of duties and taxes exempt;
  - (cc) date of importation;
  - (dd) tariff classification number;
  - (ee) customs entry number; and
  - (ff) application fee.
31. Explain if (and how) the GOC determines which imported inputs are consumed by your business in the production of the subject goods and in what amounts, and the amount of duty paid or payable on the inputs (including any allowance for waste).
32. Explain how the GOC determined the percentage rate of duty exemption.
- Please note that goods consumed in the production of exported goods (inputs) include:
- (c) goods incorporated into the exported goods; and
  - (d) energy, fuel, oil and catalysts that are used or consumed in the production of the exported goods.
33. Provide a representative sample of copies of import entry documents (for example: bill of entry, invoice from supplier, etc.) for each type of importation covering duty-exempt inputs and duty-paid inputs imported for use in the manufacturing of the subject goods.

## FOR PUBLIC RECORD

34. In addition to the import entry documents, you must also provide copies, if applicable, of any applications submitted to and/or approval document received from the GOC relating to the exemption from the payment of import duty and import VAT on imported inputs and in relation to the VAT that is refunded on the exportation of the subject goods.
35. Provide copies of reports and audits by the GOC authority responsible for administering the duty rebate or duty drawback scheme with respect to the verification of the importation and use of inputs and the remittance or drawback of the related duty paid or payable.
36. To your knowledge, does the program still operate or has it been terminated?

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

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

### I-6 Other Programs

**ANSWER:**

**This section is not applicable, the company didn't receive benefits from other programs.**

3. Provide a list of all the provinces in which you have business operations (including locations of factories, sales offices, or other places of business).

**ANSWER:**

**The company is operated in Shandong province.**

4. Are you aware of any programs of the Government of China, any of its agencies or any other authorised body that benefits manufacturers of the goods that have not been accounted for in this questionnaire? Provide the name of those programs you are aware of (even if your company is not eligible to receive benefit under the program.)

**ANSWER:**

**Not applicable, the company is not aware of programs of Government of China.**

17. Indicate the location of the program by region, province or municipal level

**ANSWER:**

**Not applicable, the company is not aware of programs of Government of China, and the company never receive the program.**

18. Indicate the type of program, for example:
  - the provision of grants, awards or prizes;
  - the provision of goods or services at a reduced price (e.g. electricity, gas, transport);
  - the reduction of tax payable including income tax and VAT;
  - reduction in land use fees;
  - loans from Policy Banks at below-market rates; or
  - any other form of assistance.

**ANSWER:**

**Not applicable, the company is not aware of programs of Government of China, and the company never receive the program.**

For **each program and any additional programs** that you have identified that are not listed in Section I, complete the worksheet "I-6.1 any other program", and answer the following questions

**FOR PUBLIC RECORD**

below. For **each loan and any additional loans** that you have identified that are not listed in Section I, complete the worksheet "I-6.2 loans", and answer the following questions below.

19. Indicate whether your company benefited from any of the listed programs during the period.

**ANSWER:**

**The company took the loans from Shandong Liaocheng Runchang Rural Commercial Bank Co., Ltd., please refer to Appendix I-6.2 for details of the loan.**

**Shandong Liaocheng Runchang Rural Commercial Bank Co., Ltd. is not a state-owned bank and the loan terms are business terms, therefore, the company didn't receive benefit or subsidy from the loan.**

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

**ANSWER:**

**The company used the loans to purchase raw materials for the production of Cold-rolled coils, GI coils and Colour collated coils etc.**

**As indicated above, the company got the loan from private business bank, therefore, the company didn't receive subsidy from the loan.**

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

**ANSWER:**

**As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.**

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

**ANSWER:**

**As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.**

23. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.

**ANSWER:**

**As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.**

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

**ANSWER:**

**As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.**

25. State whether your eligibility for the program was conditional on one or more of the following criteria:

- a) whether or not your business exports or has increased its exports;
- b) the use of domestic rather than imported inputs;
- c) the industry to which your business belongs; or
- d) the region in which your business is located.

**ANSWER:**

**FOR PUBLIC RECORD**

**As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.**

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

**ANSWER:**

**The company used the loans to purchase raw materials for the production of Cold-rolled coils, GI coils and Colour collated coils etc.**

**As indicated above, the company got the loan from private business bank, therefore, the company didn't receive subsidy from the loan.**

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

**ANSWER:**

**As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.**

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

**ANSWER:**

**As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.**

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

**ANSWER:**

**As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.**

30. If the program has been terminated, please provide details (including when and why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program? If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part I-4.4 in relation to this programme.

**ANSWER:**

**As indicated above, the company got the loan from private business bank, and interest rates are business interests, therefore the company didn't receive benefits from the loan.**

## EXPORTER'S DECLARATION

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

**Name** :.....

**Signature** :.....

**Position in  
Company** :.....

**Date** :.....

## APPENDIX GLOSSARY OF TERMS

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

### **Adjustments**

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

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

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

### **Arms length**

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

### **Constructed value**

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

### **Cost of production/manufacturing**

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

### **Cost to make and sell**

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

### **Country of origin**

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

### **Date of sale**

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

### **Direct labour cost**

## FOR PUBLIC RECORD

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

### Dumping

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

### Dumping margin

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

### Export price

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

### Exporting country

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

### Factory overheads

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

### Goods under consideration (the goods)

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

### Incoterms

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

EXW	ex works (the seller's minimum obligation as costs relate to goods being made available at the seller's premises)
FCA	free carrier (main carriage not paid by seller. Pay costs until such time that the goods have been delivered at the named point into custody of a carrier named by the seller. Customs formalities, taxes etc. paid if required)
FAS	free alongside ship (main carriage not paid by seller. Deliver the goods alongside the ship)
FOB	free on board (main carriage not paid by seller. Deliver the goods on board, provide export clearance if required, pay loading costs to the point the goods have passed the ship's rail, pay customs formalities, taxes etc. payable upon exportation)
CFR	cost and freight (main carriage paid by seller. Pay all costs until delivered as well as freight, loading and unloading, pay customs formalities, taxes etc. payable upon exportation)
CIF	cost, insurance and freight (main carriage paid by seller. Pay all costs as under CFR as well as marine insurance)
CPT	the terms CFR and CIF are only used where goods are carried by sea or waterway transport
CIP	carriage paid to carriage and insurance paid to the terms CPT and CIP are used as alternatives to CFR and CIF where the goods are carried by air, road, rail etc.
DAF	delivered at frontier (goods carried by rail or road and cleared for export at the named place at the frontier. Pay costs until delivered at the frontier plus any discharge costs incurred to place the goods at the customer's disposal)
DES	delivered ex ship (goods made available to the buyer on board the ship uncleared for import at

## FOR PUBLIC RECORD

	the named port of destination. Pay all costs incurred in placed at the disposal of the buyer, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDU	delivered duty unpaid (Pay all costs for carriage to the agreed point, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDP	delivered duty paid (goods made available at the named place in the country of importation – all risks and costs being incurred by the seller including duties, taxes etc. incurred upon importation)

### **The period**

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

### **Like goods**

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

### **Normal value**

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

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

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

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

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

### **Ordinary course of trade**

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

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

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



**Selling, general and administration expenses (SG&A)**

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

- . domestic sales of like goods;
- . sale of goods of the same general category by the exporter; or
- . sales in the industry in the country of export.

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