



**Australian Government**  
Department of Industry, Science,  
Energy and Resources

**PUBLIC RECORD**

**Anti-Dumping  
Commission**

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## **Exporter Questionnaire**

**Case number:** 540 and 541

**Product:** Aluminium extrusions

**From:** Malaysia

**Investigation period:** 1 January 2019 – 31 December 2019 (the period)

**Response due by:** Wednesday 1 April 2020

**Return completed questionnaire to:**  
[investigations3@adcommission.gov.au](mailto:investigations3@adcommission.gov.au)

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

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## INSTRUCTIONS

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

The Anti-Dumping Commission (the Commission) is conducting two investigations in relation to two separate applications seeking the imposition of anti-dumping measures on aluminium extrusions exported to Australia from Malaysia. The questionnaire has been developed in order to obtain information in relation to the following investigations;

- *Anti-Dumping Investigation No.540* (mill finished extrusions only)
- *Anti-Dumping Investigation No.541* (surface finished extrusions - excluding mill finish)<sup>1</sup>

The Commission will use the information you provide to determine normal values and export prices over the investigation period (the period) in relation to each of the investigations listed above. This information will determine whether aluminium extrusions sinks are dumped.

### IMPORTANT

By completing this questionnaire, please ensure that you indicate on the declaration page which investigation you are cooperating with.

### 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 Commission 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 Commission, 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

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<sup>1</sup> Anti-Dumping Notices No. 2020/18 and 2020/19 refer.

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- 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.

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 Commission as soon as possible for a potential verification date to be scheduled.

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

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

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

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

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

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

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

- All questions in this exporter questionnaire must be completed. If a question is not applicable to your situation, please answer the question with "Not Applicable" and provide an explanation as to why.
- All questions must be answered in English. An English translation must be provided for documents not originally in English.
- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same measurement consistently throughout your response to the questionnaire.
- Label all attachments to your response according to the section of the questionnaire it relates to (e.g. label the chart of accounts as Attachment A-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 Commission to request access to SIGBOX if required.

## CHECKLIST

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

<b>Section</b>	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"/>
Exporter's declaration	<input checked="" type="checkbox"/>
Completed for Investigation No.540	<input checked="" type="checkbox"/>
Completed for Investigation No.541	<input checked="" type="checkbox"/>
Non-confidential version of this response	<input checked="" type="checkbox"/>

<b>Attachments</b>	Please tick if you have provided spreadsheet
B-2 Australian sales	<input checked="" type="checkbox"/>
B-4 Upwards sales	<input checked="" type="checkbox"/>
B-5 Upwards selling expenses	<input 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 type="checkbox"/>
G-7.4 Raw material purchases	<input checked="" type="checkbox"/>
G-8 Upwards costs	<input checked="" type="checkbox"/>

## GOODS UNDER CONSIDERATION (GUC)

As previously noted, the Commission is conducting two investigation in relation to two separate applications seeking the imposition of anti-dumping measures on aluminium extrusions exported to Australia from Malaysia. The investigations are being conducted separately as *Anti-Dumping Investigation No.540* and *Anti-Dumping Investigation No.541*.

Customarily, the data requested in questionnaires issued by the Commission pertains to a singular description of the GUC. However, as the purpose of this questionnaire is seeking information about the goods the subject of two separate applications, this questionnaire will be used for the purpose of both investigations. Please ensure that the declaration to this questionnaire indicates for which investigation the questionnaire is being lodged.

### For the purpose of *Anti-Dumping Investigation No.540*

The goods under consideration, i.e. those goods exported to Australia, allegedly at dumped prices, for the purpose of the application relating to mill finished aluminium extrusions being examined in *Anti-Dumping Investigation No.540* are:

*Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium Association commencing with 1, 2, 3, 5, 6 or 7 (or proprietary or other certifying body equivalents), with the **finish being as extruded (mill) (excluding all other surface finishes)**, whether or not worked, having a wall thickness or diameter greater than 0.5 mm., with a maximum weight per metre of 27 kilograms and a profile or cross-section which fits within a circle having a diameter of 421 mm.*

### For the purpose of *Anti-Dumping Investigation No.541*

The goods under consideration, i.e. those goods exported to Australia, allegedly at dumped prices, for the purpose of the application relating to aluminium extrusions with a surface finish (other than mill finished) being examined in *Anti-Dumping Investigation No.541* are:

*Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium Association commencing with 1, 2, 3, 5, 6 or 7 (or proprietary or other certifying body equivalents), with the **finish being mechanical, painted, powder coated, anodised or otherwise coated (excluding mill-finish)**, whether or not worked, having a wall thickness or diameter greater than 0.5 mm., with a maximum weight per metre of 27 kilograms and a profile or cross-section which fits within a circle having a diameter of 421 mm.*

**NOTE: For the purpose of this questionnaire, references to 'the goods' are a joint reference to the descriptions of the GUC relating to *Anti-Dumping Investigation No.540* and *Anti-Dumping Investigation No.541*.**

### Additional information about the GUC the subject of each investigation

Whilst the following information is not part of the description of the GUC outlined above in relation to *Anti-Dumping Investigation No.540* and *Anti-Dumping Investigation No.541*, consistent with previous cases relating to aluminium extrusions undertaken by the Commission, the following discussion about the GUC is provided as an aid for determining whether exports are covered by the GUC descriptions above for each investigation.

The goods the subject of either *Anti-Dumping Investigation No.540* and *Anti-Dumping Investigation No.541* include aluminium extrusion products that have been further processed or fabricated to a limited extent, after aluminium has been extruded through a die. Aluminium extrusion products that have been worked (e.g. precision cut, machined, punched or drilled) fall within the scope of the goods for both investigations.

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The goods do not extend to intermediate or finished products that are processed or fabricated to such an extent that they no longer possess the nature and physical characteristics of an aluminium extrusion, but have become a different product.

Consistent with previous investigations, this investigation will also rely upon the information shown in the table below in its assessment of the goods under consideration and like goods.

< GUC >				< Non GUC >		
1	2	3	4	5	6	7
Aluminium extrusions	Aluminium extrusions with minor working	Aluminium extrusions that are parts intended for use in intermediate or finished products	Aluminium extrusions that are themselves finished products	Unassembled products containing aluminium extrusions, e.g. 'kits' that at time of import comprise all necessary parts to assemble finished goods	Intermediate or partly assembled products containing aluminium extrusions	Fully assembled finished products containing aluminium extrusions
< Examples >						
Mill finish, painted, powder coated, anodised, or otherwise coated aluminium extrusions	Precision cut, machined, punched or drilled aluminium extrusions	Aluminium extrusions designed for use in a door or window	Carpet liner, fence posts, heat sinks	Shower frame kits, window kits, unassembled unitised curtain walls	Unglazed window or door frames	Windows, doors

The table below outlines the tariff classifications<sup>2</sup> that are applicable to imported aluminium extrusions:

<b>Tariff classification (Schedule 3 of the Customs Tariff Act 1995)</b>			
<b>Tariff code</b>	<b>Statistical code</b>	<b>Unit</b>	<b>Description</b>
7604.10.00	06	Kg	Non alloyed aluminium bars, rods and profiles
7604.21.00	07	Kg	Aluminium alloy hollow angles and other shapes
7604.21.00	08	Kg	Aluminium alloy hollow profiles
7604.29.00	09	Kg	Aluminium alloy non hollow angles and other shapes
7604.29.00	10	Kg	Aluminium alloy non hollow profiles
7608.10.00	09	Kg	Aluminium tubes and pipes, not alloyed
7608.20.00	10	Kg	Aluminium tubes and pipes, alloyed
7610.10.00	12	Kg	Aluminium doors, windows and their frames and thresholds for doors
7610.90.00	13	Kg	Other aluminium structures and parts thereof

<sup>2</sup> These tariff classifications and statistical codes are used when imports are declared to the Australian customs and may include goods that are both subject and not subject to this investigation. The listings of these tariff classifications and statistical codes are for convenience or reference only and do not form part of the goods description.



## MODEL CONTROL CODE

Details of the combined model control code (MCC) structures for the goods subject to *Anti-Dumping Investigations No.540 and No.541* 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.

Category	Sub-category		Sales data	Cost data
Finish	<b>A</b>	Anodise	Mandatory	Mandatory
	<b>BD</b>	Bright dip		
	<b>M</b>	Mill		
	<b>PC</b>	Powder coating		
	<b>MC</b>	Mechanical		
Alloy code	<b>6A</b>	6060, 6063	Mandatory	Optional
	<b>6B</b>	6106		
	<b>6C</b>	6101, 1350, 6082, 6351, 6061		
	<b>6D</b>	6005A		
	<b>O</b>	Other*		
Temper code	<b>T1</b>	T1, T4, T5, T6	Optional	Optional
	<b>T50</b>	T591, T595, T52		
	<b>O</b>	Other*		
Anodising microns	<b>0</b>	Not anodised	Optional	Optional
	<b>1</b>	<20µm		
	<b>2</b>	>20µm		

\* Specify alloy code and temper code

In constructing a MCC, use a "-" between each category. For example, goods relevant to *Anti-Dumping Investigation No.540* with a mill finish, alloy of 6063 and temper of T5 will have a MCC of **M-6A-T1**. Goods relevant to *Anti-Dumping Investigation No.541* with a powder coating, alloy of 6060 and temper T5 will have an MCC of **PC-6A-T1-0**.

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: [REDACTED]  
Position in the company: [REDACTED]  
Telephone: +60387258899  
E-mail address: [REDACTED]

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

Name:  
Address:  
Telephone:  
E-mail address:

*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.  
[Lot 11, Jalan Perusahaan 1, Kawasan Perusahaan Beranang, 43700 Beranang, Semenyih, Selangor Darul Ehsan, Malaysia.](#)
4. Please provide the location of the where the company's production records are held.  
[Lot 11, Jalan Perusahaan 1, Kawasan Perusahaan Beranang, 43700 Beranang, Semenyih, Selangor Darul Ehsan, Malaysia.](#)

### A-2 Company information

1. What is the legal name of your business?  
[LB ALUMINIUM BERHAD \("LB"\).](#)
2. Does your company trade under a different name and/or brand? If yes, provide details.  
[No.](#)
3. Was your company ever known by a different legal and/or trading name? If yes, provide details  
[No.](#)
4. Provide a list of your current board of directors and any changes in the last two years.  
[Please refer to ATTACHMENT – LB BOARD OF DIRECTORS. No changes in the last two years for the board of directors.](#)
5. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint-ventures)? If yes, provide: [LB Aluminium Berhad is the parent company.](#)
  - (a) A diagram showing the complete ownership structure; and  
[Please refer to ATTACHMENT - LB GROUP STRUCTURE.](#)
  - (b) A list of all related companies and its functions  
[Please refer to ATTACHMENT – LB LIST OF RELATED COMPANIES AND FUNCTIONS.](#)
6. Is your company or parent company publically listed?  
[LB Aluminium Berhad is a public listed company.](#)

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If yes, please provide:

- (a) The stock exchange where it is listed; and  
[Main Market of Bursa Malaysia Securities Berhad](#)
- (b) Any principle shareholders<sup>3</sup>  
[Please refer to ATTACHMENT – PRINCIPAL SHAREHOLDERS.](#)

If no, please provide:

- (a) A list of all principal shareholders and the shareholding percentages.  
[Not applicable.](#)

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.  
[LB is a manufacturer of aluminium extrusions with various alloy and temper and different finishing. LB then sells to the domestic and export markets directly. Please refer to CONFIDENTIAL ATTACHMENT – B2 AUSTRALIAN SALES, CONFIDENTIAL ATTACHMENT – D2 DOMESTIC SALES & CONFIDENTIAL ATTACHMENT – F2 THIRD COUNTRY SALES for the details of products that LB manufacture and the market LB sells into.](#)
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.[LB performs all of the above functions directly.](#)
9. Provide your company's internal organisation chart.  
[Please refer to CONFIDENTIAL ATTACHMENT – LB OC – 2019.](#)
10. Describe the functions performed by each group within the organisation.  
[Please refer to CONFIDENTIAL ATTACHMENT – A2.10.](#)
11. Does your company produce brochures, pamphlets or other promotional material? If yes, please provide them.  
[Yes. Please refer to ATTACHMENT – LB PROMOTIONAL BROCHURES and at <http://www.lbalum.com/catalog-download> for the company promotional material.](#)

### A-3 General accounting information

1. What is your financial accounting period?  
[1<sup>st</sup> May to 30<sup>th</sup> April.](#)
2. Are your financial accounts audited? If yes, who is the auditor?  
[Yes. BDO PLT.](#)
3. What currency are your accounts kept in?  
[Malaysian Ringgit \(MYR\)](#)
4. What is the name of your financial accounting system?  
[\[REDACTED\] Management System](#)

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<sup>3</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.

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5. What is the name of your sales system?  
[REDACTED] Management System
6. What is the name of your production system?  
[REDACTED] Management System
7. If your financial accounting, sales and production systems are different, how do the systems interact? Is it electronically or manual? Please provide a detailed explanation and include diagrams.  
Not applicable.
8. Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If yes, please provide details.  
No.
9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.  
No changes over the last 2 years.

### A-4 Financial Documents

1. Please provide the two most recently completed annual reports and/or financial statements for your company and any other related companies involved in the production and sale of the goods.  
Please refer to ATTACHMENT - LB ANNUAL REPORT 2018 and ATTACHMENT - LB ANNUAL REPORT 2019.
2. If the financial statements in A-4.1 are unaudited, provide for each company:
  - (a) the tax returns relating to the same period; and
  - (b) reconciliation of the revenue, cost of goods sold, and net profit before tax between the financial statements and tax returns.Not applicable.
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.Not applicable
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  
Please refer to CONFIDENTIAL ATTACHMENT – A4.4(A).
  - (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.  
Not applicable.
5. Please provide a copy of your company's trial balance (in Excel) covering the period and the most recent financial year.  
Please refer to CONFIDENTIAL ATTACHMENT – A4.5.
6. Please provide your company's chart of accounts (in Excel).  
Please refer to CONFIDENTIAL ATTACHMENT – A4.6 CHART OF ACCOUNTS.

## SECTION B EXPORT SALES TO AUSTRALIA

### B-1 Australian export sales process

1. Provide details (and diagrams if appropriate) of the export sales process of your company and any entities (e.g. agents) including:
    - (a) Marketing and advertising activities
      - LB Aluminium Website
      - Direct marketing by salesperson.
    - (b) Price determination and/or negotiation process  
Negotiation process differs by customers. [REDACTED]  
[REDACTED] LB will then produce and directly deliver to the Australia customers as per agreed shipping terms.
    - (c) Order placement process  
Orders are placed by e-mail to the sales team as based on agreed payment terms, delivery method and price structure.
    - (d) Order fulfilment process and lead time  
Order fulfilment process and lead time will differs according to the order volume, type of finishing, type of profile, additional engineering work requirement and die availability.
    - (e) Delivery terms and process  
Delivery terms differs for each customers depending on their needs at the time of order placement.
    - (f) Invoicing process  
Invoice issued based on [REDACTED]
    - (g) Payment terms and process  
Payment terms differs by customers [REDACTED]  
[REDACTED]
  2. Do your exports of the goods to Australia involve an intermediary or intermediaries?  
No.
- If yes, please answer or respond to the following;
- (a) List the name of each intermediary involved in the exportation.
  - (b) Are any of the intermediaries a related entity, such as through, your parent company with subsidiaries, common ownership (directors/family members) or joint-ventures?
  - (c) Does the export of your goods to Australia involve selling those goods to the intermediary prior to or close to those goods leaving the port of export?
  - (d) What functions does the intermediary undertake in relation to the sales and/or export of the goods to Australia?
  - (e) List the exportation costs incurred by the intermediary?
  - (f) Are the goods shipped to Australia via the port of export directly from your facility, or via a warehousing or staging location under the control of, or specified by, the intermediary?
  - (g) If the sales of your goods exported to Australia involve an intermediary please report the relevant sales information in the Australian listing at B-2.

## PUBLIC RECORD

**IF** sales to the intermediary are not on-sold by the intermediary in an identical quantity or product mix to please submit a separate Australian sales listings for your sales to the intermediary and sales by the intermediary to the Australian customer using the format provided in the worksheet named "B-2 Australian sales"  
Not applicable.

3. In what currency do you invoice your customers (of any relevant intermediary) 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;  
Yes. Currency used for invoice are in USD.
  - (b) Do you use forward contracts to lock in the foreign exchange rate relating to the export sales? If yes, provide details;  
No.
  - (c) How is the exchange rate determined in your accounting system and how often is it updated?  
Using Bank [REDACTED] middle rate as at 5pm of the day before. The exchange rate are updated daily into the system.
4. 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.  
No.
5. If sales are in accordance with price lists or price extras list, provide copies of these lists.  
LB does not have a price list for sales to Australia and is quoted according to market situation.
6. 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.  
LB produces and directly delivers to the Australian customers [REDACTED]  
[REDACTED] Pricing varies according to the market situation.
7. 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.  
LB does not provide on-invoice discounts and/or off-invoice rebates on extrusion to any customer or an associate of the customer in relation to the sale of the goods exported to Australia during the period.
8. 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.  
Please refer to CONFIDENTIAL ATTACHMENT – B1.8
9. 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?Not applicable.

## B-2 Australian sales listing

1. Complete the worksheet named "B-2 Australian sales"<sup>4</sup>
  - This worksheet lists all sales (i.e. transaction by transaction) exported to Australia of the goods invoiced within the period. This includes exports to Australia sold through a domestic customer.
  - If you have claimed in B-1.9 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.
  - If sales are exported to Australia through an intermediary, complete the relevant columns as required.

Please refer to [CONFIDENTIAL ATTACHMENT – B2 AUSTRALIAN SALES](#).
2. Provide a table listing the source of the data for each column in the "B-2 Australian sales" listing (including data relevant to sales through intermediaries).  
Please refer to [CONFIDENTIAL ATTACHMENT – B2.2](#)

## B-3 Sample export documents

In relation to your exports covered by **Anti-Dumping Investigations No.540 and No.541** please provide the following. A sample of four exports (two for each investigation) are to be selected.

1. Select the two largest invoices by value and provide the following documentation:
  - Contracts
  - Purchase order and order confirmation
  - Commercial invoice and packing list (*including invoices relevant to sales through an intermediary*)
  - 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)

For Anti Dumping Investigation No,540:

Please refer to [CONFIDENTIAL ATTACHMENT – FULL SET MF AUSTRALIAN SALE 1 & CONFIDENTIAL ATTACHMENT – FULL SET MF AUSTRALIAN SALE 2](#).

For Anti Dumping Investigation No.541:

Please refer to [CONFIDENTIAL ATTACHMENT – FULL SET NA AUSTRALIAN SALE 3 & CONFIDENTIAL ATTACHMENT – FULL SET PC AUSTRALIAN SALE 4](#).

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.  
Please refer to [CONFIDENTIAL ATTACHMENT – B3.2](#).

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<sup>4</sup> Referring to question B-1.2(g), if necessary use the B-2 Australian sales worksheet to separately report export sales by any relevant intermediary.

## B-4 Reconciliation of sales to financial accounts

1. Please complete the worksheet named "B-4 Upwards sales" to demonstrate that the sales listings in B-2, D-2 and F-2 are complete.
  - You must provide this list in electronic format using the template provided.
  - Please use the currency that your accounts are kept in.
  - If you have used formulas to complete this worksheet, these formulas must be retained.  
Please refer to [CONFIDENTIAL ATTACHMENT – B4 UPWARD SALES](#).
2. Please provide all documents, other than those in A-4, B-2 and D-2, required to complete the "B-4 Upwards sales" worksheet. If the documents include spreadsheets, all formulas used must be retained.  
Please refer to [CONFIDENTIAL ATTACHMENT – B4 UPWARD SALES](#).
3. For any amount in the "B-4 Upwards sales" worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
  - the name of the source document, including the relevant page number, in column D of the worksheet; and
  - highlight or annotate the amount shown in the source document.  
Please refer to [CONFIDENTIAL ATTACHMENT – B4 UPWARD SALES](#).

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

1. Please complete the worksheet named "B-5 Upwards selling expense" to demonstrate that the direct selling expenses (e.g. Inland transport) in B-2 and D-2 are complete.
  - You must provide this list in electronic format using the template provided.
  - Please use the currency that your accounts are kept in.
  - If you have used formulas to complete this worksheet, these formulas must be retained.  
Not applicable. LB does not have direct selling expenses.
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.  
Not applicable.
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.  
Not applicable.



## 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.

Please refer to [CONFIDENTIAL ATTACHMENT – B2 AUSTRALIAN SALES](#) for the various alloy type, temper and finishing which was exported to Australia during the investigation period.

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.

MCCs of the goods exported to Australia are as below:

1. A-6A-T1-1
2. A-6A-T1-2
3. M-6A-T1
4. M-6A-T50
5. M-6C-T1
6. M-6D-T1
7. M-O-T1
8. PC-6A-T1

### 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.

Please refer to [CONFIDENTIAL ATTACHMENT – C2.1 LIKE GOODS](#)

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.

MCCs of like goods sold on the domestic market are as below:

1. A-6A-O-O
2. A-6A-O-1
3. A-6A-T1-O
4. A-6A-T1-1
5. A-6A-T1-2
6. A-6A-T50-O
7. A-6A-T50-1
8. A-6C-O-O
9. A-6C-T1-O
10. A-6C-T1-1
11. M-6A-O
12. M-6A-T1
13. M-6A-T50
14. M-6C-O
15. M-6C-T1
16. M-6D-T1
17. M-O-O
18. M-O-T1
19. PC-6A-O

- 20. PC-6A-T1
- 21. PC-6A-T50
- 22. PC-6C-O
- 23. PC-6C-T1
- 24. PC-O

### **C-3 Internal product codes**

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

If yes: [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.  
[Please refer to CONFIDENTIAL ATTACHMENT - C3.1\(A\) for the details of the product codes.](#)
- (b) Provide details on how you mapped the product or SKU codes to the MCC for the purpose of completing this questionnaire.  
[Please refer to CONFIDENTIAL ATTACHMENT - B2 AUSTRALIAN SALES for the details on mapping the product codes to MCC.](#)
- (c) Provide a table of showing the product or SKU codes for each MCC.  
[Please refer to CONFIDENTIAL ATTACHMENT - B2 AUSTRALIAN SALES for the details.](#)

If no:

- (a) Provide details on the method used to identify the MCC in the sales and cost spreadsheets.  
[Not applicable.](#)

## 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
    - Archidex 2019 Exhibition
    - Event flyers
    - Kiosk @ Malaysian Institute of Architects
    - LB Aluminium Website
    - Advertisements (Malaysian Institute of Architects, Federation of Malaysian Manufacturers & Construction In Focus Magazine)
    - Product & technical presentations
    - Direct marketing by salesperson
  - (b) Price determination and/or negotiation process  
Negotiation process differs by customers [REDACTED]  
[REDACTED] They then place the orders at the agreed pricing, agreed delivery period and other agreed terms and conditions.
  - (c) Order placement process  
Purchase order from customer.
  - (d) Order fulfilment process and lead time  
Sales admin monitor and liaise with production planner follow customer delivery schedule.
  - (e) Delivery terms and process  
Deliver to customer address or another delivery address specify by customer. Delivery arrange by lorry.
  - (f) Invoicing process  
Invoice issued following [REDACTED]
  - (g) Payment terms and process  
Payment term follow the agreed term with customer.
2. Are any domestic customers related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.  
No.
3. If sales are in accordance with price lists or price extras list, provide copies of these lists.  
LB does not have a price list for domestic sales and is quoted according to market situation.
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.  
Selling prices differs by customers and negotiated as based on current market condition.
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.  
LB does not provide on-invoice discounts and/or off-invoice rebates on extrusion to any customer or an associate of the customer in relation to the sale of the goods to domestic market during the period.

## PUBLIC RECORD

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.  
[We issue credit note for defect material returns from customer, unit price discrepancy & debit note for under charge pricing. Please refer to CONFIDENTIAL ATTACHMENT – D1.6.](#)
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?  
[Not applicable.](#)

### 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.[Please refer to CONFIDENTIAL ATTACHMENT – D2 DOMESTIC SALES.](#)
2. Provide a table listing the source of the data for each column in the “D-2 domestic sales” listing.  
[Please refer to CONFIDENTIAL ATTACHMENT – D2.2](#)

### D-3 Sample domestic sales documents

In relation to your domestic sales covered by **Anti-Dumping Investigations No.540 and No.541** please provide the following. A sample of four domestic sales (two for each investigation) are to be selected.

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

[For Anti Dumping Investigation No,540:](#)

[Please refer to CONFIDENTIAL ATTACHMENT – FULL SET MF DOMESTIC 1 & CONFIDENTIAL ATTACHMENT – FULL SET MF DOMESTIC 2.](#)

[For Anti Dumping Investigation No.541:](#)

[Please refer to CONFIDENTIAL ATTACHMENT – FULL SET NA DOMESTIC 3 & CONFIDENTIAL ATTACHMENT – FULL SET PC DOMESTIC 4.](#)

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.  
[Please refer to CONFIDENTIAL ATTACHMENT – D3.2.](#)

## 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.

Not applicable.
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.

Not applicable.
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.

Not applicable.

## 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

Not applicable. We have specific payment terms agreed at the time of sale.
  - (b) Do you have short term borrowings or an overdraft facility? If yes, what is the interest rate, or average of interest rates?

Not applicable.
  - (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?

Not applicable.
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

Not applicable. We have specific payment terms agreed at the time of sale.
  - (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?

Not applicable.

### E-2 Packaging

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

Domestic sales of like goods are mostly packed into bundle with plastic wrapper and placed in a standard wooden rack. Packing method also varies from customer to customer.
2. What is the packaging used for your export sales of the goods to Australia?

Method of packing differs based on the customer requirement. The most common method are corrugated paper interleave wrapping with plastic sheet and packed into a wooden crate before stacking with steel platform as the base.

## PUBLIC RECORD

3. If there are distinct differences in packaging between your domestic and export sales:
  - (a) Provide details of the differences  
For export sales, the goods are packed in wooden crate. Additional plastic interleave wrapping are provided to reduce scratches during container transport. Furthermore steel platform with rollers are included for ease of loading/unloading of goods from the container. Domestic goods are packed in rack. No steel platform are used for local goods.
  - (b) Calculate the weighted average packaging cost for each model sold on the domestic market  
Please refer to the Unit Packing at CONFIDENTIAL ATTACHMENT – D2 DOMESTIC SALES
  - (c) Calculate the weighted average packaging cost for each model exported to Australia  
Please refer to the Unit Packing at CONFIDENTIAL ATTACHMENT – B2 AUSTRALIAN SALES
4. How are the goods exported to Australia shipped, e.g. containerised, and how does this compare with the method used to deliver domestic sales?  
Goods exported to Australia are shipped in container while goods of domestic sales are delivered by lorry.
5. Does the export of the goods to Australia involve the use of devices, sometimes described as trolleys, stillages or otherwise, to assist in the loading and unloading of the goods exported to Australia? If so, please provide a brief description of these devices and address the following further questions.  
Goods exported to Australia does involve the use of steel platform based on requirement of each order. The steel platform used is a type of steel base platform with customised steel roller to enable easy loading and unloading of the goods into and out of the container.
  - (a) Are these devices exported with the goods, and if so does the Australian importer return these devices back to Malaysia?  
The steel platform exported with the goods are not returned to Malaysia.
  - (b) If the devices are shipped with the goods to Australia and returned to Malaysia, in what manner are the devices returned, who incurs the shipping costs for returning these devices and by what mechanism is the cost recovered, e.g. credit notes, direct payment of funds?  
Not applicable. The devices shipped with the goods to Australia are not returned to Malaysia.
  - (c) If the devices are NOT returned to Malaysia, is the cost of the device included in the price of the goods exported to Australia or separately charged to the Australian importer?  
The cost of the steel platform is included in the price of the goods exported to Australia.
  - (d) Are the loading devices used in the export of your goods to Australia sourced from a third party supplier or self-produced?  
Self-produced.

### 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?  
Yes but depending on the delivery term agreed with the customer beforehand. In average, transportation cost is calculated by [REDACTED]
2. What are the delivery terms of the export sales of the goods to Australia?  
Ex-factory(EXW), FOB, CIF & DDU.

## PUBLIC RECORD

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?  
[REDACTED]
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?  
[REDACTED]
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?  
[REDACTED]
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?  
[Not applicable. No Australian sales are under the delivery terms of delivered duty paid.](#)

### 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.  
[Yes. Please refer to CONFIDENTIAL ATTACHMENT - B2 AUSTRALIAN SALES & CONFIDENTIAL ATTACHMENT - D2 DOMESTIC SALES.](#)
2. Are there any differences in tax liability, e.g. Goods and Services Tax (GST), or any other form of taxation that exists between domestic and export sales? If yes, provide details, for example:
  - What is the rate of GST on sales of the goods exported to Australia and like goods sold into the Malaysian domestic market?
  - How is GST accounted for in your records in relation to sales of the goods and like goods?
  - Do you receive a GST 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?[Not applicable.](#)
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[Not applicable.](#)
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[Not applicable.](#)

### 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.[Not applicable](#)



## 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.  
[No.](#)
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.  
[Yes to LB Aluminium \(Singapore\) Pte. Ltd. which is a wholly owned subsidiary of LB Aluminium Berhad. Please refer to CONFIDENTIAL ATTACHMENT – F1.2.](#)
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?[Not applicable.](#)

### F-2 Third country sales listing

1. Complete the worksheet named “F-2 Third country sales”
  - This worksheet lists all export sales, summarised by country and customer, to third countries of like goods invoiced within the period.
  - If you have claimed in F-1.3 that the date of sale is one other than the invoice date, then add sales with your claimed date of sale.
  - You must provide this list in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.[Please refer to CONFIDENTIAL ATTACHMENT – F2 THIRD COUNTRY SALES](#)
2. Provide a table listing the source of the data for each column in the export sales listing (F-2.1).  
[Please refer to CONFIDENTIAL ATTACHMENT – F2.2](#)

### 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.  
[No differences in sales to third countries which may affect the comparison to export sales to Australia.](#)

## SECTION G COST TO MAKE AND SELL

### G-1. Production process

1. Describe the production process for the goods and provide a flowchart of the process. Include details of all products manufactured using the same production facilities as those used for the goods. Also specify all scrap or by-products that result from producing the goods.  
Please refer to CONFIDENTIAL ATTACHMENT - G1 PRODUCTION PROCESS for the flowchart of the production process. All scrap or by-products that result from producing the goods are aluminium extrusion.
2. Are any of your suppliers related to your company (regardless of whether it is relevant to the manufacture of the goods)? If yes, please provide details including the product or services supplied by the related company.  
Yes. Please refer to CONFIDENTIAL ATTACHMENT – G7.4 RAW MATERIAL PURCHASES.

### G-2. Cost accounting practices

1. Is your company's cost accounting system based on actual or standard costs (budgeted)?  
LB is using actual cost for the costing accounting system. We are using the actual cost to allocate the cost.
2. If your company uses standard costs:
  - (a) Were standard costs used as the basis of actual costs in your responses G-3.1 & G-5.1?
  - (b) Have all variances (i.e. differences between standard and actual production costs) been allocated to the goods?
  - (c) How were those variances allocated?
  - (d) Provide details of any significant or unusual cost variances that occurred during the period.  
Not applicable.
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.

Cost Centre

[REDACTED]

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

Product specificity

- Aluminium

- [REDACTED]

- Roll forming

## PUBLIC RECORD

5. Are there any costs for management accounting purposes valued differently to financial accounting purposes? If yes, provide details of the differences.  
No difference.
6. Has your company engaged in any start-up operations in relation to the goods? If yes:
  - (a) Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.
  - (b) State the total cost of the start-up operation and the way that your company has treated the costs of the start-up operation in its accounting records.Not applicable.
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)?  
By weighted average cost. Please refer to LB Annual Report 2019, pg.93, Item 4.10 Inventories.
8. What are the valuation methods for damaged or sub-standard goods generated at the various stages of production?  
By weighted average cost.
9. What are the valuation methods for scrap, by products, or joint products?  
By weighted average cost.
10. Are any management fees/corporate allocations charged to your company by your parent or related company? If yes, provide details  
Not applicable. LB is the parent 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.Please refer to CONFIDENTIAL ATTACHMENT – G3 DOMESTIC CTM. There are no difference in cost to make between domestic and Australia goods.
2. Provide a table listing the source of the data for each column of the "G-3 Domestic CTM" listing.  
Please refer to CONFIDENTIAL ATTACHMENT - G3.2.

## G-4 Selling, General & Administration expenses

1. Complete the worksheet named "G-4.1 SG&A listing".
  - This worksheet lists all selling, general and administration expenses by account code for the most recent accounting period and the period.
  - You must provide this list in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.  
[Please refer to CONFIDENTIAL ATTACHMENT – G4.1 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.  
[Please refer to CONFIDENTIAL ATTACHMENT – G4.2 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.  
[Please refer to CONFIDENTIAL ATTACHMENT – G5 AUSTRALIAN CTM.](#)
2. Provide a table listing the source of the data for each column of the "G-5 Australian CTM" listing.  
[Please refer to CONFIDENTIAL ATTACHMENT – G5.2.](#)

## G-6 Cost allocation methodology

1. What is the allocation methodology used to complete in G-3 domestic CTM and G-5 Australian CTM for:
  - (a) Raw materials
  - (b) Labour
  - (c) Manufacturing overheads[Allocation method – all by kilogram \(kg\)](#)
2. Select the domestic model (export model if you have no domestic production of like goods) with the largest production volume over the period and provide worksheets demonstrating the allocation methodology described in G-6.1 from your normal cost accounting system to the cost for that model reported in G-3.1.  
[Please refer to CONFIDENTIAL ATTACHMENT – G6.2.](#)

## G-7 Major raw material costs

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

Major raw material is aluminium billet which are purchase from the following suppliers:



2. Are any raw materials, e.g. aluminium billet used to produce aluminium extrusions, 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" to report the production costs of these raw materials. **No. All raw material are purchase from suppliers and related parties.**

- 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.

Not applicable.

3. Using the domestic cost data in "G-3 Domestic CTM" (use "G-5 Australian CTM" if you have no domestic production of like goods), calculate the weighted average percentage of each raw material cost (listed in G-7.1) as a proportion of total cost to make.

Please refer to CONFIDENTIAL ATTACHMENT – G7.3.

4. For each raw material identified in G-7.3, e.g. aluminium billet, and powder (in the case of powder coated extrusions), and purchases of scrap aluminium, aluminium ingot and other raw materials which individually account for 10% or more of the total cost to make, complete the worksheet named "G-7.4 Raw material purchases"

- This worksheet lists all raw material purchases (i.e. transaction by transaction) purchased by your company within the period.
- You must provide this list in electronic format using the template provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to CONFIDENTIAL ATTACHMENT – G7.4 RAW MATERIAL PURCHASES.

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

Please refer to CONFIDENTIAL ATTACHMENT – G7.5.

6. For each raw material:

- (a) Select the two largest invoices by value and provide the commercial invoice and proof of payment.

Please refer to CONFIDENTIAL ATTACHMENT – G7.6(A).

- (b) Reconcile the total value listed in "G-7.4 Raw material purchases" listing to relevant purchase ledgers or trial balances in your accounting system. Provide copies of all documents used to demonstrate the reconciliation.

Please refer to CONFIDENTIAL ATTACHMENT – G7.6(B).

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7. Are any of the suppliers in “G-7.4 Raw material purchases” listing related to your company? If yes, please provide details on how the price is set.  
[Yes. The price is based on market price \(LME\) at time of purchase.](#)

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

1. Please complete the worksheet named “G-8 Upwards costs” to demonstrate that the cost listings in G-3 and G-5 are complete.
  - You must provide this list in electronic format using the template provided.
  - Please use the currency that your accounts are kept in.
  - If you have used formulas to complete this worksheet, these formulas must be retained.[Please refer to CONFIDENTIAL ATTACHMENT – G8 UPWARDS COSTS.](#)
2. Please provide any documents, other than those in A-4, G-3 and G-5, required to complete the “G-8 Upwards costs” worksheet.  
[Please refer to CONFIDENTIAL ATTACHMENT – G8 UPWARDS COSTS.](#)
3. For any amount that is hard coded (i.e. not a formula), please cross-reference by providing:
  - the name of the source document, including the relevant page number, in column D of the worksheet; and
  - highlight or annotate the amount shown in the source document.[Please refer to CONFIDENTIAL ATTACHMENT – G8 UPWARDS COSTS.](#)

### **G-9 Capacity Utilisation**

4. Please complete the worksheet named “G-9 Capacity Utilisation”.
  - You must provide this list in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.[Please refer to CONFIDENTIAL ATTACHMENT – G9 CAPACITY UTILISATION.](#)

## EXPORTER'S DECLARATION

I hereby declare that LB ALUMINIUM BERHAD (company) have completed the attached questionnaire for the purpose of;

(Please tick  both or either of the following)

Anti-Dumping Investigation No.540 (mill finish)

Anti-Dumping Investigation No.541 (surface finished)

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 : **30/4/2020** .....

## 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**

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 actions covered by *Anti-Dumping Investigations 540 and 541* relate. That is, the goods covered by *Anti-Dumping Investigations 540 and 541* that you have exported to Australia allegedly at dumped prices.

## Incoterms

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

EXW	ex works (the seller's minimum obligation as costs relate to goods being made available at the sellers premises)
FCA	free carrier (main carriage not paid by seller. Pay costs until such time that the goods have been delivered at the named point into custody of a carrier named by the seller. Customs formalities, taxes etc. paid if required)
FAS	free alongside ship (main carriage not paid by seller. Deliver the goods alongside the ship)
FOB	free on board (main carriage not paid by seller. Deliver the goods on board, provide export clearance if required, pay loading costs to the point the goods have passed the ship's rail, pay customs formalities, taxes etc. payable upon exportation)
CFR	cost and freight (main carriage paid by seller. Pay all costs until delivered as well as freight, loading and unloading, pay customs formalities, taxes etc. payable upon exportation)
CIF	cost, insurance and freight (main carriage paid by seller. Pay all costs as under CFR as well as marine insurance) the terms CFR and CIF are only used where goods are carried by sea or waterway transport
CPT	carriage paid to
CIP	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 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

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	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 (that is the goods relevant to ***Anti-Dumping Investigations No.540 and 541***) 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

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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.