



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

**PUBLIC VERSION**

**Anti-Dumping  
Commission**

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## **Exporter Questionnaire**

**Case number:** 543

**Product:** Aluminium extrusions

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

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

**Response due by:** Monday 23 March 2020

**Return completed questionnaire to:**  
[investigations4@adcommission.gov.au](mailto:investigations4@adcommission.gov.au)

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

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## GOODS SUBJECT TO ANTI-DUMPING MEASURES

The goods subject to anti-dumping measures (the goods) 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), mechanical, anodized or painted or otherwise coated, 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.*

The goods 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 painted, anodised, or otherwise coated, or worked (e.g. precision cut, machined, punched or drilled) fall within the scope of the goods.

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, the review 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 goods subject to the anti-dumping measures may be classified to the following subheadings in Schedule 3 of the *Customs Tariff Act 1995*:

7604.10.00/06	non alloyed aluminium bars, rods and profiles
7604.21.00/07	aluminium alloy hollow angles and other shapes
7604.21.00/08	aluminium alloy hollow profiles
7604.29.00/09	aluminium alloy non hollow angles and other shapes
7604.29.00/10	aluminium alloy non hollow profiles
7608.10.00/09	non alloyed aluminium tubes and pipes
7608.20.00/10	aluminium alloy tubes and pipes
7610.10.00/12	doors, windows and their frames and thresholds for doors
7610.90.00/13	Other

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**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.

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		
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, a powder coated aluminium extrusion with alloy code 6060 and temper code 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: Deputy Chief Financial Officer  
Address: Tangerine Garden, Guangshan Road, Licheng Town, Zengcheng City,  
Guangdong Province, 511300, PRC  
Telephone: [REDACTED] (English or Chinese) or [REDACTED]  
(Chinese only)  
E-mail address of contact person:  
[REDACTED]

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

Name: Mr John Bracic – J.Bracic & Associates Pty Ltd  
Address: PO Box 3026, Manuka ACT 2603  
Telephone: +61 (0)499 056 729  
E-mail address of contact person: [john@jbracic.com.au](mailto:john@jbracic.com.au)

*In nominating a representative, you are granting authority to the Commission to discuss matters relating to the case with the nominated representative, including your company's confidential information.*

3. Please provide the location of where the company's financial records are held.  
Financial records for PanAsia China are held at its manufacturing facility offices. However, as per the recent review, its financial records can be accessed at its corporate group offices in HK.
4. Please provide the location of where the company's production records are held.  
Production records for PanAsia China are held at its manufacturing facility offices. However, as per the recent review, its production records can be accessed at its corporate group offices in HK.

### A-2 Company information

1. What is the legal name of your business?  
Response: PanAsia Aluminium (China) Limited ("PanAsia China")
2. Does your company trade under a different name and/or brand? If yes, provide details.  
Response: No.
3. Was your company ever known by a different legal and/or trading name? If yes, provide details  
Response: No.
4. Provide a list of your current board of directors and any changes in the last two years.  
Response: Please refer to **Confidential Exhibit A-2.4 - List of Board of Directors**.
5. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint-ventures)? If yes, provide:  
(a) A diagram showing the complete ownership structure; and  
(b) A list of all related companies and its functions  
Response: PanAsia is wholly owned by PanAsia Enterprises Group Limited. PanAsia Enterprises Group Limited is wholly owned by PanAsialum Holdings Company Limited. Please refer to **Confidential Exhibit A-2.5**.
6. Is your company or parent company publically listed?  
If yes, please provide:  
(a) The stock exchange where it is listed; and

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(b) Any principle shareholders<sup>1</sup>

If no, please provide:

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

Response: Yes. PanAsialum Holdings Company Limited is listed on The Stock Exchange of Hong Kong Limited. See table below for principal shareholders. Please note that the

Name	Capacity	Number of Shares	Approximate Percentage of Shareholding
Ms. Shao Liyu <sup>(Note)</sup> (former Director resigned on August 3, 2018)	Interest under in discretionary trust	900,000,000	75%
Easy Star <sup>(Note)</sup>	Beneficial Owner	900,000,000	75%
Marina Star Limited <sup>(Note)</sup>	Interest in controlled corporation	900,000,000	75%
HSBC International Trustee Limited <sup>(Note)</sup>	Trustee	900,000,000	75%

Note:

Easy Star was the registered holder of the 900,000,000 shares. Easy Star was wholly-owned by Marina Star Limited. The entire issued share capital of Marina Star Limited was owned by HSBC International Trustee Limited as trustee for The Pan Family Trust. The Pan Family Trust was a discretionary trust established by Mr. Marcus Pan as settlor and the beneficiaries included Ms. Shao Liyu. An application has been made to the Court of Cayman Island to, inter alia, remove Ms. Shao Liyu as one of the potential beneficiaries of The Pan Family Trust.

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

Response: PanAsia has manufacturing capabilities that focus of a vast array of aluminium extruded products that fall into the following broad categories:

- Heatsinks for computers
- Solar modular frames;
- Skirt boards and auto parts;
- Electronic products accessories (ie, mobile phones, keyboards, speakers)
- Door and windows;
- Fencing.

Other than Australia and China, PanAsia sells in the following markets – Canada, France, Germany, HK, Malaysia, NZ, Singapore, South Africa, Switzerland, UK, USA, Vietnam.

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:

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<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.

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- (a) produce or manufacture;
- (b) sell in the domestic market;
- (c) export to Australia; and
- (d) export to countries other than Australia.

Response: PanAsia China is a manufacturer of aluminium products and is directly involved in the sale of those goods on the domestic market in China. It does not directly export goods to Australia or other markets. This function is performed by OPAL which is responsible for selling and arranging the exportation of goods.

9. Provide your company's internal organisation chart.

Response: Please refer to **Confidential Exhibit A-3.9 - Internal organisational chart of PanAsia China**.

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

Response: Please refer to **Confidential Exhibit A-3.9 - Internal organisational chart of PanAsia China**.

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

Response: PanAsia China does not prepare specific product brochures or pamphlets. However, we have prepared a product overview relating to our business for your information.

### A-3 General accounting information

1. What is your financial accounting period?

Response: The accounting period is the calendar year, i.e., from 1 January through 31 December.

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

Response: Yes. The auditors are [REDACTED].

3. What currency are your accounts kept in?

Response: Chinese RMB

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

Response: The accounting system is called [REDACTED].

5. What is the name of your sales system?

Response: The sales system is called [REDACTED].

6. What is the name of your production system?

Response: The production system is called [REDACTED].

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

Response: PanAsia China's electronic systems are connected with each other, with sales and costing information being imported directly into its accounting system.

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

Response: PanAsia follows China Accounting Standards for Foreign Invested Enterprises, which is comprised of the GAAP of CHINA.

9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.

Response: There are no changes in accounting methods used by the Company over the last two years.

### A-4 Financial Documents

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

Response: Please refer to **Confidential Exhibit A-4.1 – Audited Financial Accounts for 2017 and 2018**. Please note that PanAsia China's 2019 audited financial report is not yet available. It is expected to be available in May 2020 and will be submitted at that time.



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

Response: Not applicable.

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

Response: 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
  - (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.

Response: Income Statement for the accounting and review period is at confidential attachment **Confidential Exhibit A-4.4**.

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

Response: Please refer to **Confidential Exhibit A-4.5 – Trial Balance**.

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

Response: Please refer to **Confidential Exhibit A-4.6 – 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
  - (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

Sales terms are negotiated directly by OPAL with the customers in Australia. OPAL is responsible for and makes all necessary arrangements for delivery of the goods from the suppliers to the port of export and then to Australia. OPAL arranges and pays for inland transportation, ocean freight and marine insurance.

OPAL issues sales invoices to each customer in Australia and liaises with the customers in Australia for shipment arrangements.

2. In what currency do you invoice your customers for goods exported to Australia? **Australian dollars.**  
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, please refer to commercial invoices in Exhibit B-3 for details of bank account.**
  - (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? **Daily published rates.**
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. **Panasia's sole Australian customer, Panasia Australia, is a related party. Price is set having regard to prevailing LME prices, the relevant spread and the existing anti-dumping measures.**
4. If sales are in accordance with price lists or price extras list, provide copies of these lists.  
**Not applicable.**
5. Do your export selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.  
**Not applicable.**
6. Did you provide on-invoice discounts and/or off-invoice rebates to any customer or an associate of the customer in relation to the sale of the goods exported to Australia during the period? If yes, provide a description and explain the terms and conditions that must be met by the customer to obtain the discount.  
**Not applicable.**
7. Did you issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the goods exported to Australia during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.  
**Not applicable.**
8. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:
  - (a) What date are you claiming as the date of sale?

(b) Why does this date best reflect the material terms of sale?

Not applicable.

## B-2 Australian sales listing

1. Complete the worksheet named “B-2 Australian sales”
  - This worksheet lists all sales (i.e. transaction by transaction) exported to Australia of the goods invoiced within the period. This includes exports to Australia sold through a domestic customer.
  - Any goods exempt from duties should not be included in the sales list.
  - 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.

Refer to [Exhibit B-2 – Australian sales](#). Also refer to [Exhibit B-2.1 – Inland & handling expenses](#).
2. Provide a table listing the source of the data for each column in the “B-2 Australian sales” listing.

Refer to [Exhibit B-2 – Australian sales](#).

## 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.*

Refer to [Exhibit B-3 – Sample export sales](#).

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.

Refer to [Exhibit B-3 – Sample export sales](#).

## 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.

Refer to [Exhibit B-4 – Upward sales reconciliation](#).
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.

Refer to [Exhibit B-4 – Upward sales reconciliation](#).
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:

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- 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.

Refer to [Exhibit B-4 – Upward sales reconciliation](#).

### **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.

Refer to [Exhibit B-5 – Upward 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.

Refer to [Exhibit B-5 – Upward selling expenses](#).

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.

Refer to [Exhibit B-5 – Upward selling expenses](#).

## 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.

Panasia exported aluminium extrusions in hundreds of differing profiles. These are typically finished in mill, anodised or powder coated, and made using numerous different alloys. Given the hundreds of different profiles exported, Panasia or its Australian customer can provide detailed technical drawings to the Commission during verification.

Refer to [Exhibit C-1.1](#) for technical drawings for most popular exported profiles. Also included is technical drawing for the most popular non-subject good.

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.

Refer to [Exhibit C-1.2 – Australian MCC list](#).

### 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.

Panasia sold aluminium extrusions on the domestic market in hundreds of differing profiles and for vastly different end-use applications compared to the Australian exports. Like the exports, these are also finished in mill, anodised or powder coated, and made using numerous different alloys. However, the end-use applications which include electronic and computer components, involve more technical specifications with substantially more complex profiles and stricter tolerances.

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.

Refer to [Exhibit C-2.2 – Domestic MCC list](#).

### C-3 Internal product codes

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

No. Each profile has a generated profile code which is not linked to specific characteristics. Each profile code is categorised to a broader product grouping.

If yes:

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

If no:

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

Panasia intends preparing its sales and costing spreadsheets on the basis of workshop activity, as it has during previous reviews. That is, each profile code can be linked to the corresponding workshops related to that particular extrusion.

## 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

Please refer to **Exhibit D-1** for the Transaction Flow diagram.

PanAsia China has its own sales team to service domestic customers. Customers in domestic markets are mainly [REDACTED], [REDACTED] or [REDACTED]. There are no agency or distributorship agreements.

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.

PanAsia China sells to the following related customers, who are all fellow subsidiaries of Pan Asia China:

- a) [REDACTED];

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

Not applicable.

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.

No. Selling prices in domestic market are based on the metal price (based on the prices quoted by [REDACTED]) plus a processing fee and fabrication charges agreed with individual customers. Factors in determining the processing fees are mainly based on [REDACTED], [REDACTED], [REDACTED] and [REDACTED] etc.

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.

Not applicable.

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.

Not applicable.

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

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- 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.

Refer to [Exhibit D-2 – Domestic sales](#).

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

Refer to [Exhibit D-2 – Domestic sales](#).

### D-3 Sample domestic sales documents

1. Select the two largest invoices by value and provide the following documentation:

- Contracts
- Purchase order and order confirmation
- Commercial invoice and packing list
- Proof of payment and accounts receivable ledger
- Documents showing bank charges
- Delivery invoices

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

Refer to [Exhibit D-3 – Sample domestic sales](#).

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.

Refer to [Exhibit D-3 – Sample domestic sales](#).

### D-4 Reconciliation of sales to financial accounts

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

Not applicable. Refer to [Exhibit 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.
2. Please provide all documents, other than those in A-4, D-2 and F-2, required to complete the “B-4 Upwards sales” worksheet. If the documents include spreadsheets, all formulas used must be retained.
3. For any amount in the “B-4 Upwards sales” worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
  - the name of the source document, including the relevant page number, in column D of the worksheet; and
  - highlight or annotate the amount shown in the source document.

## SECTION E DUE ALLOWANCE

### E-1 Credit expense

1. Do you provide credit to any domestic customers in relation to sales of like goods (i.e. payment terms that are not on a cash or pre-payment basis)?

Yes.

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)? No. If yes:
- Calculate the accounts receivable turnover for each domestic customer (credit sales divided by the average accounts receivable).
  - 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? [REDACTED]. 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)? [REDACTED]. If yes, what is the interest rate, or average of interest rates?

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)? [REDACTED].

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)? [REDACTED]. If yes:
- Calculate the accounts receivable turnover for each domestic customer (credit sales divided by the average accounts receivable).
  - 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):
- Do you have short term borrowings or an overdraft facility denominated in the same foreign currency? [REDACTED]. If yes, what is the interest rate, or average of interest rates?
  - 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?

### E-2 Packaging

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

Packaging is basically subject to the different requirements of the customer.

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

Packaging is basically subject to the different requirements of the customer.

3. If there are distinct differences in packaging between your domestic and export sales:

- Provide details of the differences
- Calculate the weighted average packaging cost for each model sold on the domestic market
- Calculate the weighted average packaging cost for each model exported to Australia

Please note that the cost of packaging is included in the cost of manufacture and directly allocated to each product depending on whether the product enters the packaging workshop. Please refer to B-2 and D-2 for sales relevant to packaging costs. It shows that [REDACTED] are allocated costs from the packaging workshop, whilst a [REDACTED] domestic sales are relevant to the costs of the packaging workshop.

### 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?



## PUBLIC VERSION

Yes. Panasia calculates a weighted average unit cost for domestic transport, and applied this amount to all delivered sales.

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

Delivery terms for export sales are [REDACTED] from Panasia to OPAL and [REDACTED] from OPAL.

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?

The amount of inland all-in charges reported in the export sales stated in electronic spreadsheet marked "Australian Sales" are based on [REDACTED] transportation costs for each shipment and allocated to each item based on sales quantity.

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?

The amount of inland all-in charges reported in the export sales stated in electronic spreadsheet marked "Australian Sales" are based on [REDACTED] transportation costs for each shipment and allocated to each item based on sales quantity.

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?

The amount of inland all-in charges reported in the export sales stated in electronic spreadsheet marked "Australian Sales" are based on [REDACTED] transportation costs for each shipment and allocated to each item based on sales quantity.

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.

### 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.

Not applicable.

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?

Since 1 April 2019, a full refund exists on VAT paid on exported goods. Therefore, no difference exists between export and domestic sales as neither sales have a non-refundable VAT component.

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.

## **PUBLIC VERSION**

- 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.

## 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.

Similar other than anti-dumping measures may not be considered.

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.

Not applicable.

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 reflect 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.

Refer to [Exhibit F-2 – Third country sales](#).

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

Refer to [Exhibit F-2 – 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.

Different profiles, alloys, end-use applications will affect comparison to export 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.

Please refer to **Exhibit 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.

Not applicable.

#### G-2. Cost accounting practices

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

PanAsia uses the actual input incurred to calculate costs.

2. If your company uses standard costs:

- (a) Were standard costs used as the basis of actual costs in your responses G-3.1 & G-5.1?
- (b) Have all variances (i.e. differences between standard and actual production costs) been allocated to the goods?
- (c) How were those variances allocated?
- (d) Provide details of any significant or unusual cost variances that occurred during the period.

Not applicable.

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.

Not applicable. Cost is allocated based on the processing method and material used by different production departments. For example, [REDACTED] workshop, [REDACTED] workshop, [REDACTED] workshop, [REDACTED] workshop, and [REDACTED] workshop.

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

There are no major differences among different type of products in terms of production process or material required. The only difference is the related [REDACTED] (i.e. [REDACTED], [REDACTED] or [REDACTED]) which is also captured in the production costs recorded.

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

Not applicable.

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)?

Inventories are stated at the lower of cost and net realizable value. Cost is determined using the weighted average method. The cost of finished goods and work in progress comprises raw materials, direct labour, other direct costs and related production overheads (based on normal operating capacity). It excludes borrowing costs. Net realizable value is the estimated selling price in the ordinary course of business, less applicable variable selling expenses.

8. What are the valuation methods for damaged or sub-standard goods generated at the various stages of production?  
Scrap materials or damaged goods are [REDACTED].
9. What are the valuation methods for scrap, by products, or joint products?  
There are no by-products from the production process. Scrap materials are [REDACTED] during the production process.
10. Are any management fees/corporate allocations charged to your company by your parent or related company? If yes, provide details  
Not applicable.

### **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.

Refer to [Exhibit G-3 - Domestic CTM](#) and [Exhibit G-3.1 - Domestic CTM Summary](#).
2. Provide a table listing the source of the data for each column of the "G-3 Domestic CTM" listing.  
[Refer to Exhibit G-3 - Domestic CTM](#) and [Exhibit G-3.1 - Domestic CTM Summary](#).

### **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.

Refer to [Exhibit 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.

Refer to [Exhibit G-4.2 - Dom 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.

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- 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.

Refer to [Exhibit G-5 – Australian CTM](#) and [Exhibit G-5.1 – Australian CTM Summary](#).

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

Refer to [Exhibit G-5 – Australian CTM](#) and [Exhibit G-5.1 – Australian CTM Summary](#).

### 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

Panasia allocates its expenses and cost to each product based on workshop activity and its weight. The cost of goods sold in the domestic market and to export includes:

- Cost of raw materials ( [REDACTED], [REDACTED], [REDACTED] );
- Labour;
- Manufacturing overhead (depreciation, repair and maintenance, utilities charges and materials used for generating internal heat and electricity);
- Other production cost (shipment charges, custom declaration charges, auxiliary materials used to operate the machineries and in the production process, materials used in production of dies, and packaging materials).

These costs are captured within each workshop and allocated to each product based on the corresponding weighted average unit cost for the relevant workshops which the product passes.

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.

Refer to [Exhibit G-3 - Domestic CTM](#) and [Exhibit G-3.1 - Domestic CTM Summary](#) for reconciliation of each domestic model.

### G-7 Major raw material costs

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

The only major raw material cost is aluminium ingot and aluminium billet.

2. Are any raw materials sourced as part of an integrated production process or from a subsidiary company which your company exercise control? If yes, complete the worksheet named “G-7.2 Raw material CTM” for these raw materials.
  - This worksheet lists the quarterly cost to make the raw material manufactured within the period.
  - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold).
  - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the raw material, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as ‘other costs’ if not already included, for example, under material costs.
  - You must provide this list in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.

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.

Refer to [Exhibit G-3 – Domestic CTM \(Cells D2:S4\)](#).

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

Refer to [Exhibit G-7.4 – 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.

Refer to [Exhibit G-7.4 – Raw material purchases](#).
6. For each raw material:
  - (a) Select the two largest invoices by value and provide the commercial invoice and proof of payment.
  - (b) Reconcile the total value listed in “G-7.4 Raw material purchases” listing to relevant purchase ledgers or trial balances in your accounting system. Provide copies of all documents used to demonstrate the reconciliation.

Refer to [Exhibit G-7.6 – Sample material purchases](#).
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.

Not applicable.

### **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.

Refer to [Exhibit 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.

Refer to [Exhibit G-8 – Upward 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.

Refer to [Exhibit 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.

Refer to [Exhibit G-9 – Capacity Utilisation](#).

## SECTION H PARTICULAR MARKET SITUATION

### H-1 Reporting requirements

1. Describe generally all interaction that your business has with the Government of China at all levels, including (but not limited to):

(a) reporting requirements;

Little interaction with GOC other than obligations to file its annual financial statements with relevant commerce and tax authorities and in less common circumstances, some informal statistical reporting..

(b) payment of taxes;

Panasia lodges its tax returns with the relevant tax authority.

(c) senior management representation within your business;

No interaction with GOC regarding senior management representation.

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

No interaction with GOC regarding SASAC supervision.

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

No interaction with GOC regarding business decisions.

(f) licensing;

Panasia applied for its business license with the relevant government regulatory authority. See submitted business license.

(g) restrictions on land use;

No interaction with GOC regarding land use measures.

(h) provision of loans; or

No interaction with GOC regarding loan requirements.

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

Panasia receives minor grants from local authority although no formal interaction or application process is undertaken.

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

1. Indicate whether your company is a state-owned or state-invested enterprise (SIE)
  - A state owned enterprise refers to any company or enterprise that is wholly or partially owned by the GOC (either through direct ownership or through association).

Response: No.

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

Response: Refer to Exhibit A-2.4 which identifies directors for the PanAsialum Corporate Group, along with PanAsia China and OPAL.

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

Response: Only [REDACTED] is a common director for OPAL and its parent company, PanAsialum Holdings.

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.

Response: No

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

Response: No.



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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.

Response: No.

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

Response: Refer to response at A-2.6. None of the listed shareholders are representatives of the GOC.

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

Response: Not applicable as no significant changes occurred.

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

Response: Not applicable.

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

Response: Panasia is not aware of any requirements in law or practice.

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

Response: Not applicable as PanAsia China is not a publicly-traded company.

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

Response: Not applicable.

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

Response: Company management.

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.

Response: No.

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

Response: PanAsia does not operate a pricing committee within its business. Prices are typically offered according to a [REDACTED] which takes account of the prevailing aluminium price [REDACTED].

### H-3 Licensing

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

Response: Refer to **Exhibit H-3 – Business license**.

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

Response: Guangzhou Administration for Industry and Commerce (Zengcheng Branch)

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

Response:

1. Notice of enterprise name verification
2. Lease agreement (signed by shareholder)
3. Copy of property ownership certificate
4. Resolution of shareholder meeting
5. Articles of incorporation

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6. Copy of shareholder's ID card
7. Application for company establishment
8. Letter of attorney
9. Seal carving

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

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

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

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

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

Response: Panasia understands that if a company breaches the scope and terms of its stated business licence, the sanctions may be a fine or revocation of its license.

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

Response: The business license is only for registration purpose. No benefits or rights conferred to the business license.

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

Response: If a company operates beyond the scope of business activities the company is permitted to perform, then the Company Law and the Regulations of the People's Republic of China on Administration of Company Registration, allows for the local government administration to revoke the business license.

For example, Panasia's business license refers to its principal activity as "[REDACTED]". Were it to commence manufacturing and supplying [REDACTED] products, it would be in breach of its business license and risk having its license revoked.

Panasia is unaware of other circumstances that would allow for revocation of a company's business license.

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

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

Response: Not applicable.

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

Response: Not applicable as no involvement from the GOC.

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

Response: Not applicable as no involvement from the GOC.

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.

Response: Financial reports and tax returns to be filed with the State Taxation Administration of the PRC.

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

Response: Panasia does not have access to, and is not aware of any such plans for its province or city.

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).

Response: No.

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

Response: No minutes from Directors meetings are prepared as meetings are irregular.

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

Response: Panasia does not prepare notes of meetings to discuss pricing decisions. As explained earlier, prices are typically set according to an agreed formula which takes account of prevailing aluminium ingot prices, conversion costs and gross margin.

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

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

Response: Yes, in some circumstances Panasia will take out [REDACTED] borrowing from the [REDACTED].

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

Response: Depending of the period of the loan, rates have ranged from X%-X%.

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

Response: No.

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

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

Response: No.

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

Response: No.

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

Response: No.

## **H-6 Government policy on the industry**

1. Are there any Government of China opinions, directives, decrees, promulgations, measures, etc. concerning industry of the goods that were put in place or operating during the period? If yes, please provide:

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

Response: Panasia is not aware of any such documents relating to the aluminium extrusion industry.

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

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industry of the goods in the regions, provinces or special economic zones where your company is located, including contact information regarding the following areas:

- industrial policy and guidance on the industry;
- market entry criteria for the industry;
- environmental enforcement for the industry;
- management of land utilization;
- the China Banking Regulatory Commission for the industry;
- investigation and inspection of expansion facilities;
- the section in the National Development and Reform Commission that is responsible for the industry; and
- import licensing for raw materials relating to the goods under consideration.

Response: Panasia is not aware of any government authorities responsible for such policy.

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

Response: Panasia does not play any role in development of government policy.

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

Response: No.

5. Has the Government of China designated your company and/or industry as "pillar," "encouraged," "honourable," or any other designation? If yes, please answer the following questions.

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

Response: Panasia is not aware of any government if the aluminium extrusion industry is designated as such.

## H-7 Taxation

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

Response: Yes, please table below.

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

Response: 13%.

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

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

Response: VAT rates below relate to aluminium extruded profiles. Refer to **Exhibit H-7.3**.

Period	Export VAT rate	VAT rebate rate	Non-refundable VAT rate
2012 - April 2018	17%	13%	4%
May 2018 - March 2019	16%	13%	3%
April 2019 onwards	13%	13%	0%

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

Response: Not applicable.

## H-8 Sales Terms

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

Response: [REDACTED].

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.

Response: As explained, prices are set by formula taking into account [REDACTED]. No involvement from GOC.

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.

Response: No.

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.

Response: No. Panasia does not provide such information or data.

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

Response: No. Panasia does not provide such information or data.

## 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.

Response: No.

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.

Response: Not applicable.

## H-10 Statistics submission/recording

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

Response: No.

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

Response: No.

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

Response: No.

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

Response: No.

## 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?

Response: No.

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

Response: Not applicable.

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

Response: Panasia is not aware of any restrictions.

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

Response: Refer to **Exhibit 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.

Response: No.

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

Response: No.

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

Response: No.

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

Response: No restrictions apply.

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

Response: No.

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

Response: No.

## **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.

Response: Panasia has not been subjected to any price guidance or controls.

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.

Response: Panasia has not been subjected to any price guidance or controls.

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

Response: Panasia has not encountered to any price guidance or controls.

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

Response: Price is based on formula

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

Response: Panasia does not consider that a price leader exists as each manufacturer focuses on different regions and operates to focus on different products.

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

Response: No.

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

Response: Not applicable.

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

Response: Domestic sales manager ( [REDACTED] )

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

Response: Not applicable.

### H-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.

Response: Panasia is not aware of the government approval process.

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

Response: Panasia is not aware of the government's rights with respect to adding capacity or joint ventures approval process.

### H-14 Raw materials

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

Response: No.

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

Response: Known SIEs include:

- [REDACTED], and
- [REDACTED].

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

Response: [REDACTED].

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

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

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

Response: Panasia purchases raw materials according to its production schedule, and will be arranged based on competing spot price offers from various suppliers. Selection of a supplier takes into account delivery time, competing price offers, credit terms and quality specification.

Purchases are not made by tender.

6. If any of your raw materials for the goods and/or like goods are imported by your business, or related businesses:

- 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).

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d. Are you eligible for a duty drawback? If yes, provide details.

Response: Not applicable as all raw material purchases were made locally.

7. Do you, or a business associated with you, sell any of the raw materials used to manufacture the goods and/or like goods, or sell the semi-processed goods?

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

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

Response: No.



## SECTION I COUNTERVAILING

In the most recent Review of Measures into aluminium extrusions (Review No. 482) conducted by the Anti-Dumping Commission, the following programs were found to be countervailable in respect of aluminium extrusions exported from China to Australia:

<b>Program Number</b>	<b>Program Name</b>	<b>Program Type</b>	<b>Countervailable in relation to the goods (Yes/No)</b>
2	One-time Awards to Enterprises Whose Products Qualify for 'Well-Known Trademarks of China' and 'Famous Brands of China'	Grant	Yes
3	Provincial Scientific Development Plan Fund	Grant	Yes
4	Export Brand Development Fund	Grant	Yes
5	Matching Funds for International Market Development for Small and Medium Enterprises (SME)	Grant	Yes
6	Superstar Enterprise Grant	Grant	Yes
7	Research & Development (R&D) Assistance Grant	Grant	Yes
8	Patent Award of Guangdong Province	Grant	Yes
9	Training Program for Rural Surplus Labour Force Transfer Employment	Grant	Yes
15	Aluminium provided at less than adequate remuneration	Less than adequate remuneration	Yes
18	Preferential tax policies in the Western Regions	Tax	Yes
21	Tariff and Value Added Tax (VAT) Exemptions on Imported Materials and Equipment	Tariff and VAT Exemptions	Yes
26	Innovative Experimental Enterprise Grant	Grant	Yes
29	Special Support Fund for Non-State-Owned Enterprises	Grant	Yes
32	Venture Investment Fund of Hi-Tech Industry	Grant	Yes
35	Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment	Grant	Yes
47	Preferential tax policies for high and new technology enterprises	Tax	Yes
48	Provincial Government of Guangdong (PGOG) tax offset for R&D	Tax	Yes
56	PGOG special fund for energy saving technology reform	Grant	Yes
58	Development assistance grants from the Zhaoqing New and High Tech Industrial Development Zone (ZHTDZ)	Grant	Yes
59	Processing trade special fund	Grant	Yes

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<b>Program Number</b>	<b>Program Name</b>	<b>Program Type</b>	<b>Countervailable in relation to the goods (Yes/No)</b>
60	Trade insurance support fund	Grant	Yes
61	Enterprise employment fixed point monitoring work subsidy	Grant	Yes
62	Special funds for provincial enterprises to transfer and upgrade equipment	Grant	Yes
63	Reserve funds for enterprise development	Grant	Yes
64	High integrity enterprise award 2014	Grant	Yes
65	Jiangmen engineering technology research centre award	Grant	Yes
66	2016 Shanghai Automotive Commodities Exhibition special fee subsidy	Grant	Yes
67	Corporate remuneration survey subsidy	Grant	Yes
68	Energy saving project subsidy	Grant	Yes
69	Science and technology project subsidy	Grant	Yes
70	Provincial engineering and technology research centre 2016	Grant	Yes
71	Foreign trade development fund subsidy of Jiangmen City	Grant	Yes
72	2015 Special Funds of Technology Renovation technical renovation project with environmental protection	Grant	Yes
73	Provincial Market Development Grant for foreign trade exhibitions and SMEs International market development	Grant	Yes
75	Subsidy for Supporting Foreign Trade Enterprises of Nan'an city in 2017	Grant	Yes
76	Fund for Supporting Foreign Trade Export in 2017 of Nan'an Municipal Bureau of Financial	Grant	Yes
77	Power consumption award for production and efficiency increase in December 2016	Grant	Yes
78	integration of informationization and industrialization management system (Note changed from market development due to info provided from Goomax)	Grant	Yes
79	Subsidy for invention patents	Grant	Yes
80	No. 269: Special project for technology reform- subsidy for technology reform	Grant	Yes
81	Madrid Trademark grant by Fujian Provincial Administration for Industry and Commerce	Grant	Yes
82	2016 Award for brand value from Finance Bureau	Grant	Yes
83	Social security fund Guangzhou Social Insurance Fund	Grant	Yes
84	Patent supporting fund	Grant	Yes

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<b>Program Number</b>	<b>Program Name</b>	<b>Program Type</b>	<b>Countervailable in relation to the goods (Yes/No)</b>
85	Unemployment fund Guangzhou Social Insurance Fund	Grant	Yes
86	Technology supporting fund	Grant	Yes
87	Special fund Industry technology development and research	Grant	Yes
88	Industry technology R&D fund	Grant	Yes
89	Technology innovation fund	Grant	Yes
90	Social security fund Zencheng City	Grant	Yes
91	2016 Jiangmen support fund for technology development	Grant	Yes
92	Funds for EFT16 technical reform	Grant	Yes
93	Funds for 2016 technical renovation	Grant	Yes
94	EFT provincial Industry and informatization Special research expenses supplement fund	Grant	Yes
95	2017 Enterprise Compensation Survey Fund	Grant	Yes
96	VOCs treatment fund for the process of injection workshop	Grant	Yes
97	Economic investigation fund	Grant	Yes
98	2017 Provincial Motor Energy Efficiency Promotion Special Fund	Grant	Yes
99	2017 Jiangmen Enterprise Major technology platform construction Fund	Grant	Yes
100	Receiving the payment from Taishan Finance Bureau	Grant	Yes
101	2017 Jiangmen Enterprise Research and Development Financial Aid Fund	Grant	Yes
102	Taishan High-integrity enterprise project fund	Grant	Yes
103	2017 Provincial Enterprise Research and Development Fund	Grant	Yes
104	Special funds for enterprises in large equipment manufacturing industry	Grant	Yes
105	2017 Provincial New enterprise Technology Reform Fund	Grant	Yes

## **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.

Refer to [Exhibit I-1 - Company Turnover](#).

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

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.

Refer to Exhibit G-1 for overview of the production process. Raw materials used in production are aluminium billet and aluminium ingot.

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.

No.

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

Aluminium ingot and aluminium billet.

4. Complete the worksheet named "I-2 Raw Material Purchases" for your purchases of raw materials

Refer to Exhibit I-2 - Raw material purchases.

5. Did your business receive any reduction/reduced price for the purchase of these goods 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.

No.

6. 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.

Panasia is not aware and does not have possession of any such contractual agreements.

7. 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.

Not applicable.

## 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.

Refer to Exhibit I-3 - Income Tax.

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

Refer to Exhibit I-3.2 – Tax returns.

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

[REDACTED]

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

25%.

5. 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 Section I Countervailing above?
- c. What is the name of the program?

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- 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.

Not applicable as PanAsia China pays corporate income tax at a rate of 25%.

### I-4 Financial grants

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.

Refer to [Exhibit I-4](#).

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.

Refer to [Exhibit I-4.2 – Non-operating income](#).

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.

Refer to [Exhibit I-4 - 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.

PanAsia has no information regarding the criteria, application or operation of the identified grants. Its records only contain information of the amount and title of the funds received.

## I-5 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).

[REDACTED]

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.)

No.

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

Not applicable.

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.

Not applicable.

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

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

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15. To your knowledge, does the program still operate or has it been terminated?
16. If the program has been terminated, please provide details (including when and why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?

If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part H-4 in relation to this programme.