



Australian Industry Questionnaire

Case number: 543

Product: Aluminium Extrusions

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

Review period: 1 January 2019 to 31 December 2019

Response due by: 26 May 2020

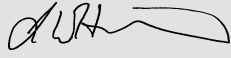
Return completed questionnaire to: investigations4@adcommission.gov.au

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

DECLARATION

I believe that the information contained in this response is complete and correct.

Signature:



Name:

Luke Hawkins

Position:

General Manager, Supply and Industrial Solutions

Company:

Capral Limited

ABN:

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Date:

29 May 2020

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SECTION A MARKET SITUATION

Section 269TAC(1) of the *Customs Act 1901* (Cth) (the Act) provides that, subject to this section, the normal value of any goods exported to Australia is the price paid or payable for like goods sold in the ordinary course of trade for home consumption in the country of export in sales that are arms length transactions by the exporter or, if like goods are not so sold by the exporter, by other sellers of like goods.

In addition, section 269TAC(2)(a)(ii) of the Act provides that, subject to this section, where the Minister is satisfied that because of the situation in the market of the country of export is such that sales in that market are not suitable for use in determining a price under subsection (1), the normal value of the goods exported to Australia cannot be ascertained under subsection (1).

In the application from Capral Limited (Capral) received by the Commission on 24 January 2020 in respect of aluminium extrusions (the goods), it was claimed that a particular market situation exists with respect to the goods within China.

Capral has based its claim that a particular market situation exists within China primarily on previous findings by the Commission. The application specifically refers to findings relating to Government of China (GOC) influence in aluminium markets, aluminium being the key raw material used in the manufacture of aluminium extrusions.¹

As part of its investigation, the Commission will consider if a market situation exists in the aluminium extrusions market in China during the inquiry period. The Commission will also investigate whether any market situation, if found to exist, influences a comparison between export prices and normal values. To undertake this assessment, the Commission requires further information about the respective markets.

¹ See, for example, findings set out in *Anti-Dumping Commission Report Nos. 148, 241, 248, 287, 304, 392 and 482*.

A-1 Whether sales are suitable

If the Minister is satisfied a market situation exists during the inquiry period, the Minister must consider whether, because of that market situation, exporters' domestic sales of the goods are suitable for determining a price under section 269TAC(1) of the Act.

1. In the event that the Minister is satisfied a market situation is found to exist during the investigation period, please comment and provide any relevant evidence on:
 - (a) the effect of the market situation on exporters' domestic prices in China (as relevant);
 - (b) the effect of the market situation on exporters' export prices;
 - (c) whether the effect of the market situation is such that exporters' domestic prices and export prices cannot be properly compared.

Capral re-affirms its position as detailed in its application for the continuation of anti-dumping measures on exports of aluminium extrusions (i.e. the "goods") from China that a particular market situation for the goods exists on the Chinese domestic market.

Capral's application detailed earlier Commission Reports that concluded that the Government of China ("GOC") exerted influence on the primary aluminium industry in China - which comprises a significant proportion of State-Invested Enterprises ("SIE's) - which has resulted in primary aluminium prices in China being lower than they otherwise would be. The impact of the artificially low raw material input prices of aluminium on the aluminium extrusion industry is that selling prices for aluminium extrusions are distorted. Capral's application cites the OECD Trade Policy Paper No. 2018 published in 2019 as confirming the GOC impact on aluminium industry prices for Chinese manufacturers - both domestic and export selling prices.

Consistent with earlier investigations - and most recently supported by the OECD Report No. 218 - the effect of the market situation on domestic selling prices for aluminium extrusions is that they are lower than they otherwise would be in the absence of the intervention.

Similarly, the export prices for Chinese aluminium extrusions are also distorted by the GOC's plans and policies that act to suppress the prices of Chinese exporters.

It is Capral's assessment that domestic selling prices for aluminium extrusions continue to be distorted by the GOC's influence and that domestic selling prices are not suitable for determining normal values under subsection 269TAC(1) of the Customs Act. It is also Capral's view - and that of the OECD - that Chinese export prices of downstream aluminium products (including aluminium extrusions) are artificially low due to the impact of the GOC policies.

Capral therefore does not consider that, for the purposes of determining normal values, that the exporter's domestic prices and export prices for aluminium extrusions can be properly compared.

2. Please provide any further information and evidence you may wish to submit.

Capral would reiterate with the Commission that the CBSA administration in Canada has similarly determined (under the CBSA's Section 20 SIMA provisions) that domestic selling prices in China are not suitable for determining normal values as they are subject to the distortionary influences of the GOC and are lower than they otherwise would be.

It is also noted that anti-dumping measures apply in the USA and Vietnam against Chinese exporters of aluminium extrusions. The European Commission (EC) is also currently investigating the export of aluminium extrusions from China at dumped prices.

SECTION B AUSTRALIAN MARKET

In responding to the questions in section B please respond to these questions in relation to the inquiry period (1 January 2019 to 31 December 2019).

B-1 Prevailing conditions of competition in the Australian market

1. Describe the Australian market for the goods and the prevailing conditions of competition within the market, including:
 - (a) Provide an overall description of the market in Australia for the goods which explains its main characteristics and trends over the past five years;
 - (b) Provide the sources of demand for the goods in Australia, including the categories of customers, users or consumers of the product;
 - (c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b);
 - (d) Describe the factors that influence consumption/demand variability in Australia, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;
 - (e) Describe any market segmentations in Australia; such as geographic or product segmentations;
 - (f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e);
 - (g) Describe the way in which Australian manufactured, Chinese and other imported goods compete in the Australian market;
 - (h) Describe the ways that the goods are marketed and distributed in the Australian market; and
 - (i) Describe any other factors that are relevant to characteristics or influences on the market in Australia for the goods.

Provide documentary evidence to support the responses made to questions 1(a) to (i).

Capral's response:

- (a) Aluminium extrusions are used in a wide variety of applications, including commercial and residential buildings for window and door frame systems, prefabricated houses/building structures, roofing and exterior cladding, curtain walling, shop fronts, fencing, airframes, road and rail vehicles, marine, electrical and general engineering.*
- (b) Demand for aluminium extrusions correlates to the general level of economic growth, especially in building/construction, industrial and transportation activities. Capral has included supporting information on New Residential Building Commencements on a Moving Annual Basis Forecast, Quarterly Basis Forecast (December 2019, and May 2020 (update). Refer Confidential Attachments B-1.1.1-3.*
- (c) Refer Confidential Attachment B-1.2.1.*
- (d) Refer to Confidential Attachment B-1.2.1 for segmentation of market.*
- (e) There exists no geographical segmentation of the aluminium extrusions market.*

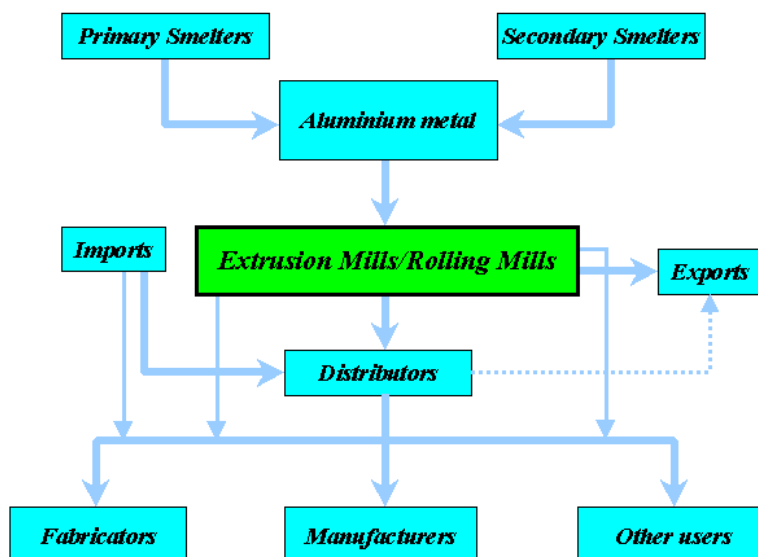
(f) Refer Confidential Attachment B-1.2.1 for estimated revenues by market segment.

(g)-(i) The Australian market is supplied by Capral and eight other aluminium extrusion manufacturers, along with imports from China, Malaysia, Vietnam and Indonesia. Many large customers have been increasingly sourcing a combination of local and imported product of the same specification. Imports almost always undercut domestic prices, however, invariably import products do not cover the whole range of Australian market requirements. Import prices are often used as a 'bargaining' device to obtain lower prices from local aluminium extrusion producers. Another feature of this process is the tendency for common, easier to make profiles to be dual-sourced, with the more difficult and lower-run volume sections mainly supplied from local sources. Multiple sourcing leads to loss of production tonnage, capacity underutilisation and production inefficiencies for local producers, contributing to material injury.

The trend in the Australian market is that the Australian market experienced an increase in demand in 2018 but has declined in 2019 to be below the levels of 2016 and 2017.

2. Provide a diagram which describes the Australian market structure for the goods, ensuring that all the categories of participants are included. In this diagram use linkages to illustrate the different levels of trade and distribution channels within the Australian market.

The diagram below outlines the aluminium extrusion industry's position (shown as Extrusion Mills/Rolling Mills) in the value chain in most, if not all, domestic markets, including Australia. It also shows the distribution channels to fabricators, manufacturers and other users.



A wide range of small to medium retail and trade end-users (including smaller fabricators, manufacturers and other users) order aluminium extrusions from distributors, metal service centres or retailers, with the choice of intermediary mainly reflecting size and complexity of orders, as well as the type of trading relationships developed over time.

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A breakdown of the Australia Market Segment Size and Share supplied by manufacturers and importers is included at Confidential Attachment B-1.2.1. This is Capral's assessment of the market only.

3. Describe the commercially significant market participants in the Australian market for the goods at each level of trade over the investigation period. Include in your description:
 - names of the participants;
 - the level of trade for each market participant (e.g., manufacturer, reseller, original equipment manufacturer (OEM), retailer, corporate stationer, importer, etc.);
 - a description of the degree of integration (either vertical or horizontal) for each market participant; and
 - an estimation of the market share of each participant.

Capral has identified that there are a further eight manufacturers of aluminium extrusions in Australia, namely:

- *Almax Aluminium Pty Ltd;*
- *Aluminium Profiles Australia Pty Ltd;*
- *Aluminium Shapemakers Pty Ltd;*
- *Extrusions Australia Pty Ltd;*
- *G James Extrusion Co Pty Ltd;*
- *Independent Extrusions Pty Ltd;*
- *Olympic Aluminium Co Pty Ltd*
- *Ullrich Aluminium Pty Ltd.*

The following companies are importers of aluminium extrusions (key source of supply identified):

[List of importers and sources of supply].

Capral has included its assessment of the Australian extrusion market in 2018 (2019 full year is yet to be finalised) by supply source (refer Confidential Attachment B-1.3.1). Capral has also included a breakdown of the Extrusion Market by segment and share of market (refer Confidential Attachment B-1.3.2).

The Distribution market for aluminium extrusions is highly fragmented. Capral's estimate of shares based upon 2018 volumes is included at Confidential Attachment B-1.3.3.

Capral has included its assessment of [market participants] Australian extruders (Confidential Attachment B-1.3.4) and participants in the extrusions market, including importers (Confidential Attachment B-1.3.5).

4. Identify the names of commercially significant importers in the Australian market for the goods over the investigation period and estimate their market share. Specify the country each importer imports from and their level of trade in the Australian market, if known.

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Please see response to B-1.3 above.

5. Describe the regulatory framework of the Australian market for the goods as it relates to competition policy, taxation, product standards and the range of the goods. Provide a copy of any regulation described, if available.

This question is not applicable to aluminium extrusions.

6. Describe any entry restrictions for new participants into the Australian market for the goods. Your response could include information on:
 - resource ownership;
 - patents and copyrights;
 - licenses;
 - barriers to entry;
 - import restrictions; and
 - government regulations(including the effect of those government regulations).

In responding to question 6 ensure that relevant regulations are referenced.

Not applicable. There exist no barriers to entry to the manufacture of aluminium extrusions in Australia.

B-2 Like goods in the Australian market

1. Generally describe the range of products/models of the goods offered for sale in the Australian market. The description should include all goods under consideration including those produced by your company. Your description could include information about:
 - quality differences;
 - price differences;
 - supply/availability differences;
 - technical support differences;
 - the prevalence of private labels/customer brands;
 - the prevalence of generic or plain labels;
 - the prevalence of premium labels; and
 - product segmentation.

The range of goods the subject of the measures are included within the goods description as follows:

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 under consideration (“GUC”) include aluminium extrusion products that have been further processed or fabricated to a limited extent, after aluminium has been extruded through a die. For example, 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.

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The GUC 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.²

Capral confirms that the goods covered by the measures are included in the description used in the Dumping Commodity Register (“DCR”) as follows.³

Aluminium extrusions that:

- *are produced by an extrusion process;*
- *are 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);*
- *have finishes being:*
 - *as extruded (mill);*
 - *mechanically worked*
 - *anodized; or*
 - *painted or otherwise coated, whether or not worked;*
- *have a wall thickness or diameter greater than 0.5 mm;*
- *have a maximum weight per metre of 27 kilograms; and*
- *have a profile or cross-section fitting within a circle having a diameter of 421 mm.*

2. Describe the end uses of the goods in the Australian market from all sources.

The uses of the aluminium extrusions the subject of the measures are reflected in the following Table:

< 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

² REP 148, p. 18 at 3.2

³ <http://www.adcommission.gov.au/measures/Documents/Aluminium%20Extrusions/DCR%20-%20aluminium%20extrusions%20150910%20%282%29.pdf>

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3. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the Australian market. Rank these preferences or purchasing influencers in order of importance.

The key attributes in the purchasing decisions in the Australian market are:

- (i) Pricing;
- (ii) Quality;
- (iii) Lead-time;
- (iv) Service.

4. Identify if there are any commercially significant market substitutes in the Australian market for the goods.

There are no commercially significant substitutes to aluminium extrusions available to the Australian market.

5. Identify if there are any commercially significant market complements in the Australian market for the goods.

There are currently no commercially significant market complements to aluminium extrusions available to the Australian market.

6. Have there been any changes in market or consumer preferences in the Australian market for the goods in the last five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.

There have been no significant changes in consumer preferences on the Australian market over the last five years.

B-3 Relationship between price and cost in Australia

1. Is your organisation/business entity the price leader of the goods in the Australian market? If no, please explain the reasons behind your response and specify the name(s) of the price leaders.

[Capral assessment].

2. Describe the nature of your product pricing (e.g., market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g., competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in Australia. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.

[Capral assessment].

3. Explain the process for how the selling prices of the goods for the Australian market by your business are determined. Provide copies of internal documents which support how pricing is determined.

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The Commission is familiar with Capral's pricing for aluminium extrusions. Capral has regard to raw material cost inputs (influenced by prevailing LME), however, pricing of import competition is key factor in price determination.

4. How frequently are your Australian selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.

[Pricing mechanism].

5. Rank the following factors in terms of their influence on your pricing decisions in the Australian market, with the most important factor ranked first and the least important factor ranked last:

Capral has identified the top 5 price influencing factors. The remainder are important, however, are secondary considerations.

[Capral's assessment].

6. Describe the relationship between selling price and costs to make and sell in the Australian market. Does your company maintain a desired profit margin for the goods? If not, does your company seek to maintain a desired profit margin for the goods? Provide copies of internal documents which support your response to this question.

The margin between selling prices and CTMS influences Capral's profit and profitability. Capral's margin is squeezed by dumped import prices.

7. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Australian market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.

[Select rebates].

8. Do you offer bundled pricing in the Australian market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices. Provide copies of internal documents which support your claims in response to this question.

Not applicable.

9. Does the volume of sales to a customer or the size of an order influence the selling price? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume based prices for the goods. Provide copies of internal documents which support your claims in response to this question.

Pricing is determined on a customer-by-customer basis in the supply negotiation process.

10. Does your organisation/business entity use sales contracts in the Australian market? If yes:

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- (a) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
- (b) Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
- (c) How frequently are sales contracts renegotiated?
- (d) How frequently are price reviews conducted between contracts?
- (e) Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review.
- (f) Do changes in your costs to make and sell enable you to review prices for customers within contracts?
- (g) Provide a list of the customers under contract during the review period and copies of the two largest contracts in terms of sales revenue.

[Capral' approach to sales contract].

11. Provide copies of any price lists for the goods used in the Australian market during the investigation period. If you do not use price lists, describe the transparency of your prices in the Australian market.

Please see attached at Confidential Attachment B-3.11.1 and B-3.11.2 for two examples of Capral pricing to customers.

12. How do you differentiate pricing for different products/models of the goods in the Australian market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost to make or selling cost differences between differentiated products. Describe how these cost differences (if any) influence pricing decisions. Provide copies of internal documents which support your claims in response to this question.

Pricing is determined on the basis of taking account of cost of the raw material, manufacturing conversion and overhead, selling expenses, contrasted with competitor prices (typically prices for imports).

13. Do you tier or segment your customers for the goods in terms of pricing? If yes, provide:
- (a) a general description of how this is done;
 - (b) list the factors that influence pricing differentiation in different tiers or segments; and
 - (c) explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

Provide copies of internal documents which support your claims in response to this question.

Refer Confidential Attachment B-3.13 for breakdown of market segments by revenue only.

14. Do you sell the goods to related entities in Australia? If yes, describe how prices are set for related party transactions and specify what proportion of your sales in terms of sales revenue are to related party entities. If available, provide copies of any internal documents relevant to establishing pricing to related parties.

Not applicable.

B-4 Marketing and sales support in the Australian market

1. How does your company market the goods in the Australian market? Include in your response the value proposition used (e.g., competitive price, superior quality, reliability, availability, etc.).

Capral has a team of sales personnel are located nationally and offer technical support for all of its sales in Australia. Capral has plants in the major states, with support offices.

2. Does your company conduct brand segmentation in the Australian market for the goods? If yes, describe the brand segmentation used and provide the proportion of sales revenue derived from each brand segment.

Capral's brand is widely recognised on the Australian market.

3. Provide examples of your Australian advertising of the goods over the past five years. If you have not used advertising in Australia, provide examples of any other promotion campaigns for the goods you have conducted over the investigation period.

Capral has undertaken some advertising of the subject goods via its online store (Non-Confidential Attachment B-4.3.1 and B-4.3.2) and on social media (Non-Confidential Attachment B-4.3.3⁴).

4. How many people are in your Australian sales team and where are they located? In general terms, how are they remunerated? If they are offered performance pay based on sales, describe the performance indicators used to establish the performance pay. Provide copies of internal documents which support your claims in response to this question.

Capral has included a breakdown of its Sales & Marketing team and remuneration details (Confidential Attachment B-4.4.1), terms of employment (Confidential Attachment B-4.4.2) and performance incentives (Confidential Attachment B-4.4.3).

5. Describe what parameters are provided to sales staff to assist in establishing pricing for the goods when negotiating sales with customers. Provide copies of internal documents which support your claims in response to this question.

Pricing is negotiated with customers in consultation with Head Office personnel at Capral. Key considerations involve prevailing LME pricing and "spread" or margin over raw material costs.

⁴ Also use product brochures <https://www.capral.com.au/resources-downloads/catalogues-brochures/>

SECTION C PRODUCTION AND PRODUCTION COSTS

In responding to the questions in section C, please respond to these questions only in relation to the inquiry period.

C-1 Production of the goods

1. Describe how your company determines its volume of production for the goods, product mix of production and the factors that contribute to these decisions. How frequently are production volumes determined? How frequently is the product mix determined? Provide copies of internal documents which support your claims in response to this question.

Capral prepares a sales order based on a customer purchase order.

[Commercially sensitive details concerning production scheduling].

Please refer the attached internal report "Mill Summary" Row 12 at Confidential Attachment C-1.1.

2. What lead times are typically needed to adjust volumes of production for the goods? Provide copies of internal documents which support your claims in response to this question.

Typical lead times for mill finish product is xx-xx weeks and surface finished products is 3-6 weeks.

3. Do you have warehousing facilities for the goods? If no, what do you do with excess inventory? If yes:
 - (a) What is the volume capacity of these facilities?
 - (b) What was the monthly amount of inventory maintained during the review period?
 - (c) What is the average period of time that inventory is retained (describe how this is calculated)?

Provide copies of internal documents which support your claims in response to this question.

Capral operates warehousing facilities in each state of Australia.

Finished stock tonnes at the end of each month in 2019 were as follows:

Month	Tonnes		Month	Tonnes	
<i>Jan 2019</i>			<i>Jul 2019</i>		
<i>Feb 2019</i>			<i>Aug 2019</i>		
<i>Mar 2019</i>			<i>Sep 2019</i>		
<i>Apr 2019</i>			<i>Oct 2019</i>		
<i>May 2019</i>			<i>Nov 2019</i>		
<i>Jun 2019</i>			<i>Dec 2019</i>		

Capral's inventory turnover ratio is xxxx. Method of calculation is sales of like goods divided by average value of like goods inventory.

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4. Have there been any changes to the type of capital or technology utilised by your company in the manufacturing of the goods in the last five years? If yes, provide details.

There has been some automation involving replacement of labour to compete with imports.

5. For each plant capable of producing inputs that could be utilised to make the goods, provide the date that production facility came into operation and the production capacity of the plant over the past five years. The production capacity should be based on an actual production capacity, not a budgeted production capacity. Provide copies of internal documents which support your claims in response to this question.

Capral has attached details of production capacity and utilisation rates, by plant, in 2019 at Confidential Attachment C-1.5.

6. Confirm whether management reports are prepared on production costs. If yes:
 - (a) specify how often these cost reports are prepared;
 - (b) describe the level of detail in those reports and whether they enable the establishment of costs of producing the goods; and
 - (c) specify to whom within the company these reports are provided; and
 - (d) provide copies of these reports for each month of the review period.

Capral prepares monthly management reports on aluminium extrusions which are distributed to the Senior Management team. Please find attached reports for June and September 2019 (Confidential Attachments C-1.6.1- 4).