



Australian Government  
Department of Industry, Science,  
Energy and Resources

Anti-Dumping  
Commission

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## Supplementary Exporter Questionnaire

**Case number:** 543

**Product:** Aluminium extrusions

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

**Investigation period:** 1 January 2019 to 31 December 2019

**Response due by:** Open of business Monday 11 May 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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## INSTRUCTIONS

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

The Anti-Dumping Commission (the Commission) is conducting a continuation inquiry into aluminium extrusions exported to Australia from the People's Republic of China (China).

The Commission will use the additional information requested in this supplementary questionnaire to determine normal values and export prices over the inquiry period (the period). This information will determine whether aluminium extrusions are dumped. The Commission will also use this information to determine whether aluminium extrusions have been in receipt of countervailable subsidies over the period.

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

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

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

### Extension requests

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

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

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

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

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

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

### Submitting a response to the exporter questionnaire

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

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

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

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

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

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

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

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

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

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

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

- Where possible, electronic data should be emailed or shared with the Commission via SIGBOX, a secure online document repository. Please contact the Commission to request access to SIGBOX if required.

## CHECKLIST

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

| Section                                      | Please tick if you have responded to all questions |
|--|--|
| Section A<br>Chinese market                  | <input checked="" type="checkbox"/>                |
| Section B<br>Production AND Production Costs | <input checked="" type="checkbox"/>                |
| Section C<br>Australian Market               | <input checked="" type="checkbox"/>                |
| 错误!未找到引用源。                                   | <input checked="" type="checkbox"/>                |
| Non-confidential version of this response    | <input checked="" type="checkbox"/>                |

## SECTION A CHINESE MARKET

### A-1 Prevailing conditions of competition in the Chinese market

1. Describe the Chinese market for the goods and the prevailing conditions of competition within the market, including:

- (a) Provide an overall description of the market in China which explains its main characteristics and trends over the past five years;

#### Answer

**The product differentiation and refinement has been improving over the past five years. More domestic customers choose to ask the Respondent to make the die for the goods based on their request, rather than use the universal die to produce the goods. Besides, patent protection of knowledge and technology has been paid more attention to in the Chinese market.**

- (b) Provide the sources of demand for the goods in China, including the categories of customers, users or consumers of the product;

#### Answer

**The goods sold in the Chinese market are for industrial uses or construction applications. The customers of the goods are end users or distributors.**

- (c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b);

#### Answer

**The Respondent has no knowledge of estimated proportion of sales revenue from each of those sources of demand in the Chinese market.**

**【Confidential】**

**【Confidential information regarding proportion of sales revenue】**

- (d) Describe the factors that influence consumption/demand variability in China, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;

#### Answer

**The main factor that influences consumption/demand variability in China is developments in technology. The update of accessories drives the technical innovation of the extrusions, and lead to the consumers' demand for high quality extrusions, which may have sound insulation effect and heat insulation effect, nice look, or more various finishes.**

- (e) Describe any market segmentations in China; such as geographic or product segmentations;

#### Answer

**There's no market segmentations in China.**

- (f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e);

Answer

**Not applicable. There's no market segmentations in China.**

- (g) Describe the way in which Chinese and imported goods compete in the Chinese market;

Answer

**The goods compete in the Chinese market based on their technology, service, brand and public praise.**

- (h) Describe the ways that the goods are marketed and distributed in the Chinese market; and

Answer

**The producers of the goods sell the goods to the domestic customers directly or via domestic traders.**

- (i) Describe any other factors that are relevant to characteristics or influences on the Chinese market for the goods.

Answer

**None.**

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

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

Answer

**The Respondent has no knowledge of the overall Chinese market structure for the goods.**

**For the Respondent itself, please refer to [Annex A-1.2](#) for the diagram for the Respondent's Chinese market structure for the goods.**

3. Describe the commercially significant market participants in the Chinese 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 (EOM), 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.

Answer

**The Respondent has no knowledge of the commercially significant market participants in the Chinese market for the goods.**

4. Identify the names of commercially significant importers in the Chinese 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 Chinese market, if known.

Answer

**The Respondent has no knowledge of the commercially significant importers in the Chinese market for the goods and their market share.**



5. Describe the regulatory framework of the Chinese 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.

Answer

**There's no regulatory framework of the Chinese market for the goods as it relates to competition policy, taxation, product standards and the range of the goods.**

6. Describe any entry restrictions for new participants into the Chinese 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.*

Answer

**The Respondent has no knowledge of the entry restrictions for new participants into the Chinese market for the goods.**

## A-2 Goods in the Chinese market

1. Generally describe the range of goods offered for sale in the Chinese market. The description should include all like goods, 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.

Answer

**There's a wide range of goods offered for sale in the Chinese market.**

**【Confidential】**

**【Confidential information regarding the information of the goods produced and sold by the Respondent in the Chinese market】**

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

Answer

**The goods in the Chinese market are for industrial uses or construction applications.**

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

Answer

The key product attributes that influence purchasing decisions or purchaser preferences in the Chinese market are the brand (quality), the services and the price. The above preferences or purchasing influencers are ranked in order of importance.

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

Answer

The commercially significant market substitutes in the Chinese market for the goods are iron, stainless steel, wood and Aluminum wood composites.

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

Answer

The commercially significant market complements in the Chinese market for the goods are iron, stainless steel, wood and Aluminum wood composites.

6. Have there been any changes in market or consumer preferences in the Chinese 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.

Answer

With the improvement of customers' requirements for the end use, the requirements for the quality and technology of the goods were also improved.

### A-3 Relationship between price and cost

1. Describe the importance of the Chinese market to your company's operations. In your response describe:
  - (a) The proportion of your company's sales revenue derived from sales of the goods in China; and

Answer

**【Confidential】**

**【Confidential information regarding the proportion of the Respondent's sales revenue derived from sales of the goods in China】**

- (b) The proportion of your company's profit derived from sales of the goods in China.

Answer

**【Confidential】**

**【Confidential information regarding the proportion of the Respondent's profit derived from sales of the goods in China】**

Please refer to [Annex A-3.1](#) for the worksheet for the profit proportion.

*In responding to question 1 please provide evidence supporting calculations.*

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

Answer

**The Respondent is not the price leader for the goods in the Chinese market. To the Respondent's knowledge, there's no price leader for the goods in the Chinese market.**

3. 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 China. 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.

Answer

**【Confidential】**

**【Confidential information regarding the Respondent's product pricing】**

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

Answer

**【Confidential】**

**【Confidential information regarding how the selling prices of the goods for the Chinese market by the Respondent are determined】**

5. How frequently are your Chinese 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.

Answer

**Not applicable. 【Confidential】**

**【Confidential information regarding how the selling prices of the goods for the Chinese market by the Respondent are determined】**

6. Rank the following factors in terms of their influence on your pricing decisions in the Chinese market, with the most important factor ranked first and the least important factor ranked last:
- Competitors' prices
  - Purchase price of raw materials
  - Cost to make and sell the goods
  - Level of inventory
  - Value of the order
  - Volume of the order
  - Value of forward orders
  - Volume of forward orders
  - Customer relationship management
  - Supplier relationship management
  - Desired profit
  - Brand attributes
  - Other [please define what this factor is in your response]

Answer

Not applicable. **【Confidential】**

**【Confidential information regarding the main factors affecting the Respondent's pricing decisions in the Chinese market】**

7. Describe the relationship between selling price and costs to make and sell in the Chinese market. Does your company maintain a desired profit margin for the goods?

Answer

**【Confidential】**

**【Confidential information regarding the relationship between selling price and costs to make and sell in the Chinese market】**

8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Chinese 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.

Answer

**The Respondent doesn't offer price reductions in the Chinese market.**

9. Do you offer bundled pricing in the Chinese 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 for the goods. Provide copies of internal documents which support your claims in response to this question.

Answer

**The Respondent doesn't offer bundled pricing in the Chinese market.**

10. Does the volume of sales to a customer or the size of an order influence your selling price in China? 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.

Answer

**The volume of sales to a customer or the size of an order has little influence on the selling price.**

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

Answer

**The Respondent uses sales contracts in the Chinese market.**

- (a) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?

Answer

**【Confidential】**

**【Confidential information regarding the proportion of the sales revenue coming 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?

**Answer**

**The Respondent doesn't offer exclusivity contracts.**

- (c) How frequently are sales contracts renegotiated?

**Answer**

**The sales contract is negotiated for each transaction.**

- (d) How frequently are price reviews conducted between contracts?

**Answer**

**Not applicable. The selling price for each transaction is determined by negotiation between the Respondent and the customer.**

- (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.

**Answer**

**Not applicable. The selling price for each transaction is determined by negotiation between the Respondent and the customer.**

- (f) Do changes in your costs to make and sell enable you to review prices for customers within contracts?

**Answer**

**Not applicable. The selling price for each transaction is determined by negotiation between the Respondent and the customer.**

- (g) Provide a list of the customers under contract during the investigation period and copies of the two largest contracts in terms of sales revenue. Provide a complete translation of the documents.

**Answer**

**Please refer to [Annex A-3.11](#) for the list of the customers under contract in the inquiry period and two contracts.**

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

**Answer**

**No price list is used for the goods sold in the Chinese market. The customers know the Respondent's prices by enquiry.**

13. How do you differentiate pricing for different products/models of the goods in the Chinese 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.

Answer

**【Confidential】**

**【Confidential information regarding the Respondent's product pricing】**

14. Do you tier or segment your Chinese customers for the goods in terms of pricing? If yes, provide:
- a general description of how this is done;
  - list the factors that influence pricing differentiation in different tiers or segments; and
  - 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.*

Answer

**The Respondent doesn't tier or segment the Chinese customers for the goods in terms of pricing.**

15. Do you sell the goods to related entities in China? 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 a copy of any internal document relevant to establishing pricing to related parties.

Answer

**【Confidential】**

**【Confidential information regarding the information of the sales between the Respondent and the related company in China】**

## A-4 Marketing and sales support in the Chinese market

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

Answer

**【Confidential】**

**【Confidential information regarding the Respondent's value proposition】**

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

Answer

**The Respondent doesn't conduct brand segmentation in the Chinese market for the goods.**

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

Answer

Please refer to [Annex A-4.3](#) for the examples of the Respondent's Chinese advertising of the goods over the past five years.

4. How many people are in your Chinese market 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.

Answer

**【Confidential】**

**【Confidential information regarding the information on the sales staff】**

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.

Answer

**【Confidential】**

**【Confidential information regarding the parameters information】**

## SECTION B

### PRODUCTION AND PRODUCTION COSTS

#### B-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 for the goods? How frequently is the product mix determined for the goods? Provide copies of internal documents which support your claims in response to this question.

##### Answer

Normally the Respondent determines its volume of production for the goods and product mix of production based on orders from the customers. However, for some basic models of goods sold on the domestic market which had relatively larger volume of sales, the Respondent arranges more production beyond the orders as daily reserves.

The Respondent determines its volume of production for the goods and product mix of production every **【Confidential】** days.

**【Confidential information regarding frequency of determining volume of production for the goods and product mix of production】**

Please refer to [Annex B-1.1](#) for an example of Extrusion Production Arrangement. The Respondent does not retain the Extrusion Production Arrangement, so the example is a recent one.

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.

##### Answer

**Not applicable. The Respondent does not adjust volumes of production for the goods.**

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 investigation 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.*

##### Answer

The Respondent has warehousing facilities for aluminium products (for both goods under consideration and non-goods under consideration).

- (a) The volume capacity of these facilities is **【Confidential】** .

**【Confidential information regarding volume capacity of these facilities】**

- (b) The monthly amount of inventory maintained for goods under consideration during the investigation period was **【Confidential】** . Please refer to [Annex B-1.3.\(b\)](#) for the supporting document, i.e. extract of ledger of stock for goods under consideration.

**【Confidential information regarding monthly amount of inventory maintained for goods under consideration during the investigation period】**

- (c) The average period of time that inventory is retained is calculated as follows:

**【Confidential】**



**【Confidential information regarding the methodology of calculating the average period of time that inventory is retained】**

Please refer to [Annex B-1.3.\(c\)](#) for the supporting documents for the above calculation.

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.

**Answer**

**There have been no changes to the type of capital or technology utilised by the Respondent in the manufacturing of the goods in the last five years.**

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.

**Answer**

**Not applicable. The Respondent has no plant capable of producing inputs that could be utilised to make the goods.**

6. List any significant investments in the past five years to either upgrade, refurbish or build any of the plants used in the production of the goods.

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

**Answer**

**The Respondent made an investment for 【Confidential】. Please refer to [Annex B-1.6](#) for the proof of investment in the plant, i.e. the invoice of the investment.**

**【Confidential information regarding the investment】**

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

**Answer**

**The Respondent does not prepare management reports on production costs.**

## SECTION C

### AUSTRALIAN MARKET

#### C-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 Australian market for the goods which explains its main characteristics and trends over the past five years;

Answer

**The imports of goods to Australia have increased 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;

Answer

**【Confidential】**

**【Confidential information regarding the sources of demand for the goods in Australia】**

- (c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b);

Answer

**The Respondent has no knowledge of estimated proportion of sales revenue from each of those sources of demand in the Australian market.**

**【Confidential】**

**【Confidential information regarding proportion of sales revenue】**

- (d) Describe the factors that influence consumption/demand variability in Australia, such as c, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;

Answer

**The seasonal fluctuations influence consumption/demand variability in Australia. The winter is the peak season and the summer is the slack season.**

- (e) Describe any market segmentations in Australia; such as geographic or product segmentations;

Answer

**There's no market segmentations in Australia.**

- (f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e);

Answer

**Not applicable. There's no market segmentations in Australia.**

- (g) Describe the way in which Australian manufactured, Chinese and other imported goods compete in the Australian market;

Answer

The goods compete in the Australian market based on their service, including delivery time and quality.

- (h) Describe the ways that the goods are marketed and distributed in the Australian market; and

Answer

For the Respondent itself, they exported the goods to the Australian customers directly in the inquiry period.

- (i) Describe any other factors that are relevant to characteristics or influences on the market for the goods in Australia.

Answer

None.

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

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.

Answer

The Respondent has no knowledge of the overall Australian market structure for the goods.

For the Respondent itself, please refer to [Annex C-1.2](#) for the diagram for the Respondent's Australian market structure for the goods.

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 (EOM), 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.

Answer

The Respondent has no knowledge of the commercially significant market participants in the Australian market for the goods.

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.

Answer

The Respondent has no knowledge of the commercially significant importers in the Australian market for the goods and their market share.

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.

**Answer**

**The Respondent has no knowledge of 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.**

6. Describe any entry restrictions for new participants into cfor 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.*

**Answer**

**The Respondent has no knowledge of the entry restrictions for new participants into the Australian market for the goods.**

## **C-2 Goods in the Australian market**

1. Generally describe the range 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.

**Answer**

**There's a wide range of goods offered for sale in the Australian market.**

**【Confidential】**

**【Confidential information regarding the information of the goods produced and sold by the Respondent in the Australian market】**

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

**Answer**

**The goods in the Australian market are for industrial uses or construction applications.**

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.

Answer

The key product attributes that influence purchasing decisions or purchaser preferences in the Australian market are the quality, the price, the environmental protection property, and the services. The above preferences or purchasing influencers are ranked in order of importance.

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

Answer

The commercially significant market substitutes in the Australian market for the goods are iron, stainless steel, wood and Aluminum wood composites.

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

Answer

The commercially significant market complements in the Australian market for the goods are iron, stainless steel, wood and Aluminum wood composites.

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.

Answer

The customers prefer the imports with lower anti-dumping duties.

### C-3 Relationship between price and cost in Australia

1. Describe the importance of the Australian market to your company's operations. In your response describe:
- (a) The proportion of your company's sales revenue derived from sales of the goods in Australia; and

Answer

**【Confidential】**

**【Confidential information regarding the proportion of the Respondent's sales revenue derived from sales of the goods in Australia】**

- (b) The proportion of your company's profit derived from sales of the goods in Australia.

Answer

**【Confidential】**

**【Confidential information regarding the proportion of the Respondent's profit derived from sales of the goods in Australia】**

Please refer to [Annex C-3.1](#) for the worksheet for the profit proportion.

*In responding to question 1 please provide evidence supporting calculations.*

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

Answer

**The Respondent is not the price leader for the goods in the Australian market. The Respondent has no knowledge of the price leader for the goods in the Australian market.**

3. 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.

Answer

**【Confidential】**

**【Confidential information regarding the Respondent's product pricing】**

4. 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.

Answer

**【Confidential】**

**【Confidential information regarding how the selling prices of the goods for the Chinese market by the Respondent are determined】**

5. 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.

Answer

**Not applicable. The selling price for each transaction is determined by negotiation between the Respondent and the customer.**

6. 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:
- Competitors' prices
  - Purchase price of raw materials
  - Cost to make and sell the goods
  - Level of inventory
  - Value of the order
  - Volume of the order
  - Value of forward orders
  - Volume of forward orders
  - Customer relationship management
  - Supplier relationship management
  - Desired profit
  - Brand attributes
  - Other [please define what this factor is in your response]

Answer

**Not applicable. 【Confidential】**

**【Confidential information regarding the main factors affecting the Respondent's pricing decisions in the Australian market】**

7. 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.

Answer

**【Confidential】**

**【Confidential information regarding the relationship between selling price and costs to make and sell in the Australian market】**

8. 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.

Answer

**The Respondent doesn't offer price reductions in the Australian market.**

9. 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 for the goods. Provide copies of internal documents which support your claims in response to this question.

Answer

**The Respondent doesn't offer bundled pricing in the Australian market.**

10. 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.

Answer

**The volume of sales to a customer or the size of an order has little influence on the selling price.**

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

Answer

**The Respondent uses sales contracts in the Australian market.**

- (a) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?

Answer

**【Confidential】**

**【Confidential information regarding the proportion of the sales revenue coming 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?

Answer

**The Respondent doesn't offer exclusivity contracts.**

- (c) How frequently are sales contracts renegotiated?

Answer

**The sales contract is negotiated for each transaction.**

- (d) How frequently are price reviews conducted between contracts?

Answer

**Not applicable. The selling price for each transaction is determined by negotiation between the Respondent and the customer.**

- (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.

Answer

**Not applicable. The selling price for each transaction is determined by negotiation between the Respondent and the customer.**

- (f) Do changes in your costs to make and sell enable you to review prices for customers within contracts?

Answer

**Not applicable. The selling price for each transaction is determined by negotiation between the Respondent and the customer.**

- (g) Provide a list of the customers under contract during the investigation period and copies of the two largest contracts in terms of sales revenue.

Answer

**Please refer to [Annex C-3.11](#) for the list of the customers under contract in the inquiry period and two contracts.**

12. 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.

Answer

**No price list is used for the goods sold in the Australian market. The customers know the Respondent's prices by enquiry.**

13. 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.

Answer

**【Confidential】**



**【Confidential information regarding the Respondent's product pricing】**

14. Do you tier or segment your Australian customers for the goods in terms of pricing? If yes, provide:
- a general description of how this is done;
  - list the factors that influence pricing differentiation in different tiers or segments; and
  - 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.*

**Answer**

**The Respondent doesn't tier or segment the Australian customers for the goods in terms of pricing.**

15. 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.

**Answer**

**Not applicable. The Respondent has no related entities in Australia.**

**C-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.).

**Answer**

**【Confidential】**

**【Confidential information regarding the Respondent's value proposition】**

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.

**Answer**

**The Respondent doesn't conduct brand segmentation in the Australian market for the goods.**

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 you have conducted over the investigation period.

**Answer**

**The Respondent has not used advertising in Australia. 【Confidential】**

**【Confidential information regarding the information of marketing strategy】**

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.

Answer

**【Confidential】**

**【Confidential information regarding the information on the sales staff】**

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.

Answer

**【Confidential】**

**【Confidential information regarding the parameters information】**