PUBLIC RECORD

Australian Government
Department of Industry, Science, Energy and Resources

Anti-Dumping Commission

Exporter Questionnaire

Case number: 544

Product: Aluminium extrusions

From: Malaysia

Review period: 1 January 2019 – 31 December 2019 (the period)

Response due by: 1-April-2020

Return completed questionnaire to:
investigations3@adcommission.gov.au

Anti-Dumping Commission website: 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 review of anti-dumping and countervailing measures currently applying to aluminium extrusions exported to Australia from Malaysia (*Anti-Dumping Notice No.2020/014* refers).

The Commission will use the information you provide to determine normal values, export prices and countervailable subsidisation over the review period (the period). The Commission will also use this information to determine whether countervailable subsidies have been received in respect of aluminium extrusions exported to Austrlaia over the period.

If you do not manufacture the goods

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

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

What happens if you do not respond to this questionnaire?

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

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

Extension requests

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

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

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

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

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

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

Submitting a response to the exporter questionnaire

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

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

Confidential and non-confidential responses

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

All information provided to the Commission in confidence will be treated accordingly. The non-confidential version of your submission will be placed on the public record, and must contain sufficient detail to allow a reasonable understanding of the substance of the information, but does not breach confidentiality nor adversely affect those interests.
A person is not required to provide a summary for the public record if the Commission can be satisfied that no such summary can be given that would allow a reasonable understanding of the substance of the information.

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

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

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

Verification of the information that you supply

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

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

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

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

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

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

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

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

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

Important instructions for preparing your response

- All questions in this exporter questionnaire must be completed. If a question is not applicable to your situation, please answer the question with "Not Applicable" and provide an explanation as to why.
- All questions must be answered in English. An English translation must be provided for documents not originally in English.
- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same measurement consistently throughout your response to the questionnaire.
- Label all attachments to your response according to the section of the questionnaire it relates to (e.g. label the chart of accounts as Attachment A-4.6)
- The data must be created as spreadsheet files in Microsoft Excel.
- If you have used formulas to complete spreadsheets, these formulas must be retained and not hard-coded.
- You must retain all worksheets used in answering the questionnaire. Be prepared to provide these worksheets during the Commission's verification of your data.
- If you cannot present electronic data in the requested format contact the case officer as soon as possible.
- Where possible, electronic data should be emailed or shared with the Commission via SIGBOX, a secure online document repository. Please contact the 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 Company information	☑
Section B Export sales to Australia	☑
Section C Exported goods & like goods	☑
Section D Domestic sales	☑
Section E Due allowance	☑
Section F Third country sales	☑
Section G Cost to make and sell	☑
Section H Countervailing	☑
Exporter's declaration	☑
Non-confidential version of this response	☑

Attachments	Please tick if you have provided spreadsheet
B-2 Australian sales	☑
B-4 Upwards sales	☑
B-5 Upwards selling expenses	☑
D-2 Domestic sales	☑
F-2 Third country sales	☑
G-3 Domestic CTM	☑
G-4.1 SG&A listing	☑
G-4.2 Dom SG&A calculation	☑
G-5 Australian CTM	☑
G-7.2 Raw material CTM	☑
G-7.4 Raw material purchases	☑
G-8 Upwards costs	☑
H-1 Company Turnover	☑
H-2 Income Tax	☑
H-3 Grants	☐
H-4 Other Programs	☐

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.*

Additional information about the goods

Whilst the following information is not part of the goods, consistent with previous cases relating to aluminium extrusions undertaken by the Commission, the following discussion about the goods is provided as an aid for determining whether exports are covered by the goods description above.

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 table below outlines the tariff classifications[1] that are applicable to imported aluminium extrusions:

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

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

MODEL CONTROL CODE

Details of the 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	**A**	Anodise	Mandatory	Mandatory
	BD	Bright dip		
	M	Mill		
	PC	Powder coating		
	MC	Mechanical		
Alloy code	**6A**	6060, 6063	Mandatory	Optional
	6B	6106		
	6C	6101, 1350, 6082, 6351, 6061		
	6D	6005A		
	O	Other*		
Temper code	**T1**	T1, T4, T5, T6	Optional	Optional
	T50	T591, T595, T52		
	O	Other*		
Anodising microns	**0**	Not anodised	Optional	Optional
	1	<20µm		
	2	>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: How Swee Chow
   Position in the company: Financial Controller
   Telephone: +603-6156 9457
   E-mail address: how@alumac.com.my

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

   Name: Not applicable
   Address:
   Telephone:
   E-mail address:

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

3. Please provide the location of the where the company's financial records are held.
   Alumac's office in Sungai Buloh, Selangor, Malaysia

4. Please provide the location of the where the company's production records are held.
   Alumac's office in Sungai Buloh, Selangor, Malaysia

A-2 Company information

1. What is the legal name of your business? Alumac Industries Sdn Bhd

2. Does your company trade under a different name and/or brand? If yes, provide details.
   Not applicable

3. Was your company ever known by a different legal and/or trading name? If yes, provide details
   Not applicable

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

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

   [redacted]

6. Is your company or parent company publically listed?
If yes, please provide: Not applicable

   (a) The stock exchange where it is listed; and
   (b) Any principle shareholders[2]

   If no, please provide:

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

   [redacted]

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.

   The principal activities of Alumac Industries Sdn Bhd are manufacturing and marketing and trading of aluminium extrusions. We sell to both domestic and overseas customers.

8. If your business does not perform all of the following functions in relation to the goods under consideration, then please provide names and addresses of the companies which perform each function:

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

   Alumac perform all of the above functions.

9. Provide your company's internal organisation chart.

10. Describe the functions performed by each group within the organisation.
Refer to company internal organisation chart in 9.

11. Does your company produce brochures, pamphlets or other promotional material? If yes, please provide them.
Confidential
A2-10-1 Company profile.
A2-10-2 Company products catalogue.

A-3 General accounting information

1. What is your financial accounting period?
1st July to 30th June

2. Are your financial accounts audited? If yes, who is the auditor?
Yes. We audit our account yearly.
Auditor : [redacted]

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[2] 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.

3. What currency are your accounts kept in?
Ringgit Malaysia.

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

5. What is the name of your sales system?
[redacted]

6. What is the name of your production system?
[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.

[redacted]

8. Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If yes, please provide details.
No different. Our Accounting practices are in accordance with Applicable Approved Accounting Standards and the Companies Act 1965 in Malaysia

9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.
Not change. Alumac does not change accounting practices over 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.

   Confidential A4-1 Financial annual report FY2018.pdf
   Confidential A4-1 Financial annual report FY2019.pdf

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.

   The above both financial annual reports FY2018 and FY2019 are audited.

3. Does your company maintain different profit centres? If yes, provide profit & loss statements for the profit centre that the goods falls into for:

   (a) the most recent financial year; and
   (b) the period.

   Not applicable. No different profit centre.

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.

544 Alumac EQ Spreadsheets A-4.4 Income Statement.

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

544 Alumac EQ Spreadsheets A-4.5 Trial Balance.

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

544 Alumac EQ Spreadsheets A-4.6 Chart of accounts.

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

SECTION B
EXPORT SALES TO AUSTRALIA

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

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
   We do not appoint any marketing agent for export sales.

   (b) Price determination and/or negotiation process
   We do not have price lists. Our pricing based on monthly average aluminium metal price (LME + MJP + Billet premium) plus production cost, support cost, shipping cost and margin.

   (c) Order placement process
   Receiving orders. Customers send purchase order/confirmation order through e-mail.

   (d) Order fulfilment process and lead time
   Estimated lead time is agreeable by both Alumac and customers before purchase order received.

   (e) Delivery terms and process
   Delivery terms C&F as agreed by both parties

   Delivery C&F: Alumac factory → Local forwarder → Malaysia port → Australia port → Australia forwarder → Australia customer warehouse.

   (f) Invoicing process
   When the container loaded and shipped out.

   (g) Payment terms and process
   Payment terms agreed by both parties.
   [redacted]
   All payment terms are shown in B-2 Australian Sales.
   Customers pay direct to Alumac's bank account in Malaysia.

2. Do your exports of the goods to Australia involve an intermediary or intermediaries?
   No. Our exports do not involve an intermediary.

   If yes, please answer or respond to the following;

   (a) List the name of each intermediary involved in the exportation.
   (b) Are any of the intermediaries a related entity, such as through, your parent company with subsidiaries, common ownership (directors/family members) or joint-ventures?
   (c) Does the export of your goods to Australia involve selling those goods to the intermediary prior to or close to those goods leaving the port of export?
   (d) What functions does the intermediary undertake in relation to the sales and/or export of the goods to Australia?
   (e) List the exportation costs incurred by the intermediary?

(f) Are the goods shipped to Australia via the port of export directly from your facility, or via a warehousing or staging location under the control of, or specified by, the intermediary?

(g) If the sales of your goods exported to Australia involve an intermediary please report the relevant sales information in the Australian listing at B-2.

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

3. In what currency do you invoice your customers for goods exported to Australia? If it is not in your local currency:
We invoice Australian customers in USD currency.

(a) Do your customers pay you into a foreign currency denominated account? If yes, provide details;
Customers pay us into foreign currency account with [redacted]

(b) Do you use forward contracts to lock in the foreign exchange rate relating to the export sales? If yes, provide details;
Not applicable.

(c) How is the exchange rate determined in your accounting system and how often is it updated?
We follow USD selling rate by Central Bank. [redacted]

4. Are there any customers of the goods exported to Australia related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.
Alumac is not related to any Australian customers.

5. If sales are in accordance with price lists or price extras list, provide copies of these lists.
We do not have price list.

6. Do your export selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.
Alumac's selling prices not vary to the distribution channel as goods were sent directly to customers.

7. Did you provide on-invoice discounts and/or off-invoice rebates to any customer or an associate of the customer in relation to the sale of the goods exported to Australia during the period? If yes, provide a description and explain the terms and conditions that must be met by the customer to obtain the discount.
Alumac does not give any discount and rebate on export sales to Australia.

8. Did you issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the goods exported to Australia during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.
Alumac did not issued any credit note to customers in Australia during the investigation period.

9. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:

(a) What date are you claiming as the date of sale?
(b) Why does this date best reflect the material terms of sale?
Not applicable.

B-2 Australian sales listing

1. Complete the worksheet named "B-2 Australian sales" [3]

   544 Alumac EQ Spreadsheets B-2 Australian sales

   - This worksheet lists all sales (i.e. transaction by transaction) exported to Australia of the goods invoiced within the period. This includes exports to Australia sold through a domestic customer.
   - This worksheet must also include exports of the goods that have been exempted from anti-dumping duties under section 8(7) and section 10(8) of the *Customs Tariff (Anti-Dumping) Act 1975.*[4]
   - 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.

     Yes. Added Column for machining cost, fumigation and powder coating.

2. Provide a table listing the source of the data for each column in the "B-2 Australian sales" listing *(including data relevant to sales through intermediaries).*

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)

     Confidential attachment
     B-3-1a Sample export documents
     B-3-1b Sample export documents

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

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

B-4 Reconciliation of sales to financial accounts

1. Please complete the worksheet named "B-4 Upwards sales" to demonstrate that the sales listings in B-2, D-2 and F-2 are complete.

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[3] Referring to question B-1.2(g), if necessary use the B-2 Australian sales worksheet to separately report export sales by any relevant intermediary.
[4] ADN No. 2019/136 & Ministerial Exemption Instrument No. 6 of 2019.

- 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.

544 Alumac EQ Spreadsheets B-4 Upward sales.

2. Please provide all documents, other than those in A-4, B-2 and D-2, required to complete the "B-4 Upwards sales" worksheet. If the documents include spreadsheets, all formulas used must be retained.

3. For any amount in the "B-4 Upwards sales" worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:

   - the name of the source document, including the relevant page number, in column D of the worksheet; and
   - highlight or annotate the amount shown in the source document.

B-5 Reconciliation of direct selling expenses to financial accounts

1. Please complete the worksheet named "B-5 Upwards selling expense" to demonstrate that the direct selling expenses (e.g. Inland transport) in B-2 and D-2 are complete.

   544 Alumac EQ Spreadsheets B-5 Upwards selling expenses.

   - You must provide this list in electronic format using the template provided.
   - Please use the currency that your accounts are kept in.
   - If you have used formulas to complete this worksheet, these formulas must be retained.

2. Please provide all documents, other than those in A-4, B-2 and D-2, required to complete the "B-5 Upwards selling expense" worksheet. If the documents include spreadsheets, all formulas used must be retained.

3. For any amount in the "B-5 Upwards selling expense" worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:

   - the name of the source document, including the relevant page number, in column C of the worksheet; and
   - highlight or annotate the amount shown in the source document.

SECTION C
EXPORTED GOODS & LIKE GOODS

The Commission considers the MCC structure in and of itself is not likely to be commercially sensitive information. Any claim that disclosing the MCC information is confidential or would adversely affect your business or commercial interests must be raised by lodging a submission as soon as practicable, but no later than the time this questionnaire is due.

C-1 Models exported to Australia

1. Fully describe all of the goods your company exported to Australia during the period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the goods exported to Australia.
   Confidential attachment
   [redacted]

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.
   Finishes, Alloy and Temper set out in C-1-2 Specification Details and B-2 Australia Sales.

   - This list must be disclosed in the public record version of the response.

C-1.2 Australian Exports

M-6063-T5-
PC-6063-T5-
A-6063-T5-

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.
   Confidential attachment
   C-2 Technical and Illustrative

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.
   Finishes, Alloy and Temper set out in D-2 Domestic Sales.

   - This list must be disclosed in the public record version of the response.

C-2.2 Domestic Like Goods

A-6061-T5-	M-1050-T4-	PC-6063-T5-
A-6061-T6-	M-1070-F-	PC-6063-T6-
A-6063-T5-	M-1070-T4-	
A-6063-T6-	M-1070-T5-	
A-6063T-T5-	M-6061-F-	
A-6082-T6-	M-6061H-T6-	
AM-6063-T5-	M-6061-T0-	
AM-6063-T6-	M-6061-T4-	

	M-6061-T5-	
	M-6061-T6-	
	M-6063-T4-	
	M-6063-T5-	
	M-6063-T6-	
	M-6063T-T5-	
	M-6082-T5-	
	M-6082-T6-	

C-3 Internal product codes

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

   (a) Provide details of the product or SKU coding system for the goods, such as a legend or key of the meaning for each code within the product or SKU code.

SKU CODE EXAMPLE :-

[redacted]

   (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.
   MCC is showing aline with every SKU codes in the B-2 and D-2 in EQ Worksheet.

If no:

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

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
   We do not appoint any marketing agent for export sales. No advertising activities except our website.

   (b) Price determination and/or negotiation process
   We do not have price lists. Selling pricing is based on monthly average aluminium metal price (LME + MJP + Billet premium) plus production cost, support cost, transport cost and margin

   (c) Order placement process
   Receiving orders. Customers send purchase order/confirmation order through e-mail.

   (d) Order fulfilment process and lead time
   Estimated lead time is agreeable by both Alumac and customers.

   (e) Delivery terms and process
   Delivery terms - Delivered warehouse
   Delivery Process – By lorry or truck.

   (f) Invoicing process
   Invoice on delivery date

   (g) Payment terms and process
   Payment terms – As shown D-2 Domestic Sales
   Payment made by cheque or direct transfer to Alumac's bank account.

   Process :

   Received customer Purchase Order → issue Order Confirmation → Production schedule → production → packing → warehouse → issue Delivery Order and Invoice → load to truck → distribute accordingly → payment received based on agreed payment terms.

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.

3. If sales are in accordance with price lists or price extras list, provide copies of these lists.
   We do not have price lists.

4. Do your domestic selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.
   We do not enter into any appointment of agency of distributors. We sell direct to customers. Hence, selling prices not vary to distribution channel.

5. Did you provide on-invoice discounts and/or off-invoice rebates to the customer or an associate of the customer in relation to the sale of the like goods during the period? If yes, provide a description; and explain the terms and conditions that must be met by the importer to obtain the discount.
   We do not practice in giving discount and rebates to customers.

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.
   Credit notes only issued on sub-standard/rejected goods from customers.

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"

   544 Alumac EQ Spreadsheets D-2 Domestic sales.

   - This worksheet lists all domestic sales (i.e. transaction by transaction) of like goods invoiced within the period, even if they are models not exported to Australia
   - If you have claimed in B-1.8 and/or D-1.7 that the date of sale is one other than the invoice date, then add the sales within your claimed date of sale.
   - You must provide this list in electronic format using the template provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.
   - If there are any other costs, charges or expenses incurred in respect of the sales listed which have not been identified in the table in question D-2 above, add a column for each item. For example, certain other selling expenses incurred.
     Yes. Added Column for machining cost and other further works.

[redacted]

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

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.

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.
   Confidential attachment
   D-3-2a Sample domestic sales Documents
   D-3-2b Sample domestic sales Documents

D-4 Reconciliation of sales to financial accounts

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

1. Please complete the worksheet named "B-4 Upwards sales" to demonstrate that the sales listings in D-2 and F-2 are complete.

   - You must provide this list in electronic format using the template provided.
   - Please use the currency that your accounts are kept in.
   - If you have used formulas to complete this worksheet, these formulas must be retained.

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)? If yes:
   Yes. Payment terms stated in invoice.
   However, we do not practice late payment interest.

   (a) Do you provide a rolling credit facility to your domestic customers (i.e. no specific payment terms agreed at the time of sale)? If yes:
      i. Calculate the accounts receivable turnover for each domestic customer (credit sales divided by the average accounts receivable).
      ii. Calculate the average credit term for each domestic customer by dividing 365 by the accounts receivable turnover
   (b) Do you have short term borrowings or an overdraft facility? If yes, what is the interest rate, or average of interest rates? Not applicable.
   (c) Do you have term deposits or other cash product (e.g. bonds)? If yes, what is the interest rate, or average of interest rates? We do have short term deposits, average interest rate is around 3.20%p.a.

2. Do you provide credit to any Australian customers in relation to sales of the goods (i.e. payment terms that are not on a cash or pre-payment basis)? If yes:
   Yes. Payment terms stated in invoice.
   However, we do not practice late payment interest.

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

E-2 Packaging

1. What is the packaging used for your domestic sales of like goods?
   Plastic tubing, wrapping.
   Pack wrapping with wooden pallet (recycle)

2. What is the packaging used for your export sales of the goods to Australia?
   Plastic tubing, wrapping
   Pack wrapping together with wooden crate and fumigated.

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

   Packing costs details down in B-2 export sales.

4. How are the goods exported to Australia shipped, e.g. containerised, and how does this compare with the method used to deliver domestic sales? Export to Australia shipped in container, Delivery to domestic sales by lorry or truck.

5. Does the export of the goods to Australia involve the use of devices, sometimes described as trolleys, stillages or otherwise, to assist in the loading and unloading of the goods exported to Australia? If so, please provide a brief description of these devices and address the following further questions.

   (a) Are these devices exported with the goods, and if so does the Australian importer return these devices back to Malaysia?

   (b) If the devices are shipped with the goods to Australia and returned to Malaysia, in what manner are the devices returned, who incurs the shipping costs for returning these devices and by what mechanism is the cost recovered, e.g. credit notes, direct payment of funds?

   (c) If the devices are NOT returned to Malaysia, is the cost of the device included in the price of the goods exported to Australia or separately charged to the Australian importer?

   (d) Are the loading devices used in the export of your goods to Australia sourced from a third party supplier or self-produced?

E-3 Delivery

1. Are any domestic sales of like goods delivered to the customer? If yes, how were the transportation costs calculated in the domestic sales listing in D-2?
   Yes.
   Total of carriage outwards equally shared by domestic sales quantity.

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

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?
   Actual cost as per forwarder's bill. Shown in Inland transport and handling in B-2 Australian Sales.

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?
   Actual cost as per shipping company. Shown in Ocean Freight in B-2 Australian Sales

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?
   Not include marine insurance.

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.
   Sales commission only related to [redacted]
   No sales commission to export sales.

2. Are there any differences in tax liability, e.g. Goods and Services Tax (GST), or any other form of taxation that exists between domestic and export sales? If yes, provide details, for example:

What is the rate of GST on sales of the goods exported to Australia and like goods sold into the Malaysian domestic market? No. GST 6% on domestic sales abolished from 1 June-2018.

- How is GST accounted for in your records in relation to sales of the goods and like goods?
- Do you receive a GST refund in relation to sales of the goods and/or like goods? No.
- Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?
  No.

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
     No.

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
     Yes. Fumigation cost if fumigation is required. As shown in B-2 Australian Sales.

E-5 Other adjustment claims

1. Are there any other adjustments required to ensure a fair comparison between the export price and the normal value (based on domestic sales, costs and/or third country sales)? If yes, provide details.

   - An adjustment will only be made where there is evidence that the difference affects price comparability.
   - Refer to Chapter 15 of the *Dumping and Subsidy Manual (November 2018)* for more information.

SECTION F
THIRD COUNTRY SALES

F-1 Third country sales process

1. Are your sales processes to any third country (i.e. exports to countries other than Australia) different to the sales process described in B-1.1? If yes, provide details of the differences.
   No different.

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.
   Alumac is not related to any third country customers.

3. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:

   (a) What date are you claiming as the date of sale?
   (b) Why does this date best reflects the material terms of sale?

F-2 Third country sales listing

1. Complete the worksheet named "F-2 Third country sales"

   544 Alumac EQ Spreadsheets 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.

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

F-3 Differences in sales to third countries

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

   No different.

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 Appendix G-1-1 Process flow chart.

   The scraps are billet end cap, extrusion scrap. The scrap will be sent to our billet supplier for re-melting and supply back to us in billets (raw material) form.

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.

   [redacted]

G-2. Cost accounting practices

1. Is your company's cost accounting system based on actual or standard costs (budgeted)?
   Actual. No separated cost accounting was done and kept. We only performed and keep financial accounting for both management and audited accounts. Refer to financial accounting statements/audited accounts given.
   Management accounts are same as audited financial statements.

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. Recorded actual cost as incurred into the financial accounting system.
   We are not using standard cost/budgeted cost. Thus, there is no variance occurred during the investigation period

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.

4. To what level of product specificity (models, grades etc.) does your company's cost accounting system normally record production costs?
   Not applicable.

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 it its accounting records.

Not applicable. We do not engage in any start-up operation in relation to the goods under consideration.

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)?
Weight average.

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

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

10. Are any management fees/corporate allocations charged to your company by your parent or related company? If yes, provide details
Not applicable. We do not have any management fees/corporate allocations charged to the related companies.
All receivable and payable are based on sales and purchase transactions.

G-3 Cost to make on domestic market

1. Complete the worksheet named "G-3 Domestic CTM".

   544 Alumac EQ Spreadsheets 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 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.

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

G-4 Selling, General & Administration expenses

1. Complete the worksheet named "G-4.1 SG&A listing".

   544 Alumac EQ Spreadsheets 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.

2. Complete the worksheet named "G-4.2 Domestic SG&A calculation".

   544 Alumac EQ Spreadsheets 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.

G-5 Cost to make the goods exported to Australia

1. Complete the worksheet named "G-5 Australian CTM".

   544 Alumac EQ Spreadsheets G-5 Australian CTM

   - This worksheet lists the quarterly cost to make the Australian models of the goods under consideration by MCC manufactured within the period.
   - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
   - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
   - You must provide this list in electronic format using the template provided.

- If you have used formulas to complete this worksheet, these formulas must be retained.
- If you have claimed in B-1.8 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all Australian sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.

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

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

   544 Alumac EQ Spreadsheets G-6 Allocation methodology

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.

   544 Alumac EQ Spreadsheets G6.2 demonstrate CTM-Model M

G-7 Major raw material costs

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

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. .
   No. Alumac is not smelter, we do not operate remelt facility.

   - 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.

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.

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

   544 Alumac EQ Spreadsheets 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.

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

6. For each raw material:

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

   Please see spreadsheet 544 Alumac EQ (sheet G-7.6(a) and G-7.6(b) Largest Invoice for purchase of billets.

   (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.

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.
   Alumac is not related to any of the raw material suppliers.

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.

   544 Alumac EQ Spreadsheets G-8 Upwards costs

   - 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 any documents, other than those in A-4, G-3 and G-5, required to complete the "G-8 Upwards costs" worksheet.

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.

G-9 Capacity Utilisation

4. Please complete the worksheet named "G-9 Capacity Utilisation".

   544 Alumac EQ Spreadsheets G-9 Capacity Utilisation

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

SECTION H
COUNTERVAILING

In *Anti-Dumping Commission Report No.362* (REP 362) which was pubished in relation to the original investigation, the Commission investigated the following six subsidy programs. REP 362 found that Program 4 and 6 were countervailable in relation to the category of non-cooperative entities.

As part of this review the Commission is seeking information relevant to those programs that were either investigated in REP 362 and/or found to be countervailable subsidies and any other subsidy programs that have been received in repsect of the goods exported to Australia during the review period 1 January 2019 to 31 December 2019.

Program Number	Program Name	Program Type	Countervailable in relation to the goods (Yes/No)
1	Income Tax Reductions ('Pioneer Status')	Income Tax	No
2	Investment Allowance	Income Tax	No
3	Double Deduction for Export Credit Insurance	Income Tax	No
4	Double Deduction for Freight Charges from Sabah or Sarawak	Income Tax	Yes
5	Double Deduction for Insurance Premiums for Exporters and Importers	Income Tax	No[5]
6	Reinvestment Allowance	Income Tax	Yes

H-1 General

1. Complete the worksheet named "H-1 Company turnover

   544 Alumac EQ Spreadsheets H-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.

H-2 Preferential tax policies

1. Please provide the following details regarding your income tax assessment status;

   (a) Please restate your income tax assessment year;July-2018 to June-2019
   (b) What is the most recent year in which your company, or the relevant parent (if part of a consolidated entity) had its income tax assessment completed by the Malaysian government; July-2018 to June-2019
   (c) What is the normal deadline for your company or the relevant parent (if part of a consolidated entity) to file its income tax assessment; 31-January-2020
   (d) Did your company receive any extensions to the deadline to lodge your company's tax assessment; No.

[5] Refer to Section A7.7 regarding the cessation of this program from the 2016 year of assessment .

(e) Does the Malaysian government require all business entities to file separate tax assessments? Please provide details; No.
(f) At the time of completing this questionnaire, please state the income tax assessment(s) that were relevant to the review period (1 January 2019 to 31 December 2019) but are not yet filed, briefly outline the circumstances as to why the tax assessment has not been filed and provide an estimate of when you expect to finalise and lodge the tax assessment; July-2019 to December-2019. File on or before 31-January-2021.
(g) If the review period covers an income tax assessment year where the filing of the assessment is not due, when do you expect to finalise and lodge the tax assessment? Please provide details for each relevant tax assessment. July-2019 to December-2019 has not been filed, due date is 31-January-2021.

2. Complete the worksheet named "H-2 Income Tax"

544 Alumac EQ Spreadsheets H-2 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.

3. Provide a copy of your company's annual tax assessment and any associated income tax computations (and any draft tax assessment sthat are not yet filed) for the last three financial years. If the documents are not in English, please provide a translation of the documents.

Confidential attachment H-2-3 Tax Return 2017
Confidential attachment H-2-3 Tax Return 2018
Confidential attachment H-2-3 Tax Return 2019 (the English version is not available yet)

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

Confidential attachment H-2-4 Tax Payments 2017
Confidential attachment H-2-4 Tax Payments 2018
Confidential attachment H-2-4 Tax Payments 2019

5. What is the general tax rate for enterprises (also referred to as the company or corporate tax rate) during the previous two financial years?
According to Malaysia Income Tax act, resident company with paid-up capital of RM2.5 million and below at the beginning of the basis period, tax rate 20% on the first RM500,000 chargeable income and 24% on subsequent chargeable income.

Malaysia general tax rate is 24% during the previous two financial years.

6. Did your company pay less than the general tax rate for enterprises referred to in question H-2.4?

If yes:

(a) What tax rate did your company pay?
24% tax rate as per attached H2-3 Tax Returns.
(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 H
Countervailing above?
(c) What is the name of the program?
(d) What is the name of the authority granting your company the reduced tax rate?

(e) What is the eligibility criteria to benefit from the reduced tax rate?
(f) Provide details of the application process
(g) Provide a copy of the blank application from. If the documents are not in English, please provide a translation of the documents.
(h) Provide a copy of your company's completed application from, 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.

H-3 Financial grants

1. Complete the worksheet named "H-3 Grants"
   Not applicable. We do not receive any financial grant during the investigation period.

   - 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.

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.

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.

4. For each of the grants listed in H-3.3:

   (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 from. If the documents are not in English, please provide a translation of the documents.
   (g) Provide a copy of your company's completed application from, 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.

H-4 Other Programs

1. Provide a list of all the provinces or regions in which you have business operations (including locations of factories, sales offices, or other places of business). Not applicable.

2. Are you aware of any programs of the Government of Malaysia, 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.)

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

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 GST;
   - reduction in land use fees;
   - loans from Policy Banks at below-market rates; or
   - any other form of assistance.

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 Malaysia 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.

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.

PUBLIC RECORD

EXPORTER'S DECLARATION

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

Name : NG CHOK TUNG

Signature :

Position in Company : CEO

Date : 20/3/2020

APPENDIX
GLOSSARY OF TERMS

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

Adjustments

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

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

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

Arms length

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

Constructed value

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

Cost of production/manufacturing

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

Cost to make and sell

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

Country of origin

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

Date of sale

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

Direct labour cost

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

Dumping

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

Dumping margin

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

Export price

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

Exporting country

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

Factory overheads

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

Goods under consideration (the goods)

The goods to which the application for anti-dumping action relates. That is, the goods that you have exported to Australia allegedly at dumped prices.

Incoterms

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

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

	the named port of destination. Pay all costs incurred in placed at the disposal of the buyer, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDU	delivered duty unpaid (Pay all costs for carriage to the agreed point, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDP	delivered duty paid (goods made available at the named place in the country of importation – all risks and costs being incurred by the seller including duties, taxes etc. incurred upon importation)

The period

A period defined by the Commission over which importations of the goods are examined.

Like goods

Like goods are goods sold on the domestic market of the country of export (or to a third country) that are identical in all respects to the goods or that, although not alike in all respects have characteristics closely resembling those of the goods. The term 'like goods' also refers to the goods produced by the Australian industry allegedly being injured by dumped imports.

Normal value

Australian legislation sets out several ways to assess "normal value".

The preferred method is to use the price paid for like goods sold for domestic consumption in the country of export. Usually, these sales are made by you, but there may be circumstances where it is appropriate to use sales made by other sellers on the domestic market.

Sale prices must be at arms length and in the ordinary course of trade. In the absence of relevant or suitable domestic sales, the normal value may be determined by constructing a price based on all costs to make and sell the goods, and an amount for profit. Alternatively the normal value may be ascertained using the price paid for like goods sold in the ordinary course of trade at arms length to customers in a country other than Australia, however this option is rarely used.

Finally, when a normal value cannot be ascertained by any of the above methods, or if no information is provided, the Commission will determine the normal value by considering all the relevant information, including the applicant's information. This allows the applicant's information to be used where sufficient information has not been furnished or is not available.

Where domestic price generally, and the trade of the exporting country are determined or substantially influenced by the government of the exporting country, an alternative/surrogate market economy is selected by the Commission and the normal value is determined as if the surrogate country were the export source.

Ordinary course of trade

Testing for "ordinary course of trade" includes a comparison of the selling price and the unit cost to make and sell for the same period. If sales in respect of a substantial quantity of goods over an extended period of time, usually 12 months, do not recover all costs and these losses are not likely to be recovered within a reasonable period of time, (again usually 12 months) then the sales are regarded as being not in the ordinary course of trade.

There may be circumstances where it is appropriate to use a period other than 12 months in assessing whether sales are in the ordinary course of trade.

Unprofitable sales are to be taken to have occurred in substantial quantities during an extended period where the unprofitable sales amount to 20% or more of the total volume of sales of the goods by the exporter over the period. An extended period of time is usually taken to be a period not less than 12 months. Where unprofitable sales are rejected, normal value is based upon remaining profitable sales provided they occur in sufficient number. Where all sales have been made at a loss, or profitable sales are insufficient, the normal value may be constructed from costs to make and sell.

Selling, general and administration expenses (SG&A)

The selling, general and administration expenses includes all selling, distribution, general and administration expenses including finance costs that would be incurred if the goods were sold for domestic consumption in the country of export. The amounts are determined in each case using all the available information and may include expenses incurred in:

- domestic sales of like goods;
- sale of goods of the same general category by the exporter; or
- sales in the industry in the country of export.

The expenses must, however, reflect the selling, general and administration costs of the goods. Administrative and selling expenses include: director's fees, management salaries and benefits, office salaries and benefits, office supplies, insurance, promotion, entertainment, depreciation and corporate overheads.