



Exporter Questionnaire

Case number: 546

Product: Steel Reinforcing Bar (Rebar)

From: Republic of Korea, Singapore, Spain (except Nervacero S.A.) & Taiwan (except Power Steel Co. Ltd)

Investigation period: 1 January 2019 to 31 December 2019 (the period)

Response due by: Thursday 9 April 2020

Return completed questionnaire to: investigations2@adcommission.gov.au

OR

Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601
Australia

Attention: Director Investigations 2

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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 Continuation Inquiry into Steel Reinforcing Bar exported to Australia from Republic of Korea, Singapore, Spain (except Nervacero S.A.) & Taiwan (except Power Steel Co. Ltd).

The Commission will use the information you provide to determine normal values and export prices over the investigation period being 1 January 2019 to 31 December 2019 (the period). This information will determine whether Steel reinforcing bar is being dumped.

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 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.

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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 public record version of your questionnaire 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 questionnaires are required to have a bracketed explanation of deleted or blacked out information for the public record version of the questionnaire. 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.

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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. The Commission considers that the dumping margin is not confidential information, but rather an aggregate figure derived from confidential data.

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

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

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

Important instructions for preparing your response

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

CHECKLIST

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

Section	Please tick if you have responded to all questions
Section A Company information	<input type="checkbox"/>
Section B Export sales to Australia	<input type="checkbox"/>
Section C Exported goods & like goods	<input type="checkbox"/>
Section D Domestic sales	<input type="checkbox"/>
Section E Due allowance	<input type="checkbox"/>
Section F Third country sales	<input type="checkbox"/>
Section G Cost to make and sell	<input type="checkbox"/>
Error! Reference source not found.	<input type="checkbox"/>
Non-confidential version of this response	<input type="checkbox"/>

Attachments	Please tick if you have provided spreadsheet
B-2 Australian sales	<input type="checkbox"/>
B-4 Upwards sales	<input type="checkbox"/>
B-5 Upwards selling expenses	<input type="checkbox"/>
D-2 Domestic sales	<input type="checkbox"/>
F-2 Third country sales	<input type="checkbox"/>
G-3 Domestic CTM	<input type="checkbox"/>
G-4.1 SG&A listing	<input type="checkbox"/>
G-4.2 Dom SG&A calculation	<input type="checkbox"/>
G-5 Australian CTM	<input type="checkbox"/>
G-7.2 Raw material CTM	<input type="checkbox"/>
G-7.4 Raw material purchases	<input type="checkbox"/>
G-8 Upwards costs	<input type="checkbox"/>

GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

The goods subject to anti-dumping measures (the goods) are:

Hot-rolled deformed steel reinforcing bar whether or not in coil form, commonly identified as rebar or debar, in various diameters up to and including 50 millimetres, containing indentations, ribs, grooves or other deformations produced during the rolling process. The goods include all steel reinforcing bar meeting the above description of the goods regardless of the particular grade or alloy content or coating.

The goods are generally, but not exclusively, classified to the following tariff subheadings of Schedule 3 to the *Customs Tariff Act 1995*:¹

Table 1: Extract from Schedule 3 to the *Customs Tariff Act 1995*

Tariff Subheading	Statistical Code	Description
7213		BARS AND RODS, HOT-ROLLED, IN IRREGULARLY WOUND COILS, OF IRON OR NON-ALLOY STEEL
7213.10.00	42	Containing indentations, ribs, grooves or other deformations produced during the rolling process
7214		OTHER BARS AND RODS OF IRON OR NON- ALLOY STEEL, NOT FURTHER WORKED THAN FORGED, HOT-ROLLED, HOT-DRAWN OR HOT- EXTRUDED, BUT INCLUDING THOSE TWISTED AFTER ROLLING
7214.20.00	47	Containing indentations, ribs, grooves or other deformations produced during the rolling process or twisted after rolling
7227		BARS AND RODS, HOT-ROLLED, IN IRREGULARLY WOUND COILS, OF OTHER ALLOY STEEL
7227.90		Other
7227.90.10	69	Goods, as follows: a. of high alloy steel; b. "flattened circles" and "modified rectangles" as defined in Note 1(l) to Chapter 72
7227.90.90	01	<i>Containing indentations, ribs, grooves or other deformations produced during the rolling process</i>
	02	<i>Of circular cross-section measuring less than 14 mm in diameter</i>
	04	<i>Other</i>
7228		OTHER BARS AND RODS OF OTHER ALLOY STEEL; ANGLES, SHAPES AND SECTIONS, OF OTHER ALLOY STEEL; HOLLOW DRILL BARS AND RODS, OF ALLOY OR NON-ALLOY STEEL
7228.30		Other bars and rods, not further worked than hot-rolled, hot-drawn or extruded
7228.30.10	70	Goods, as follows: a. of high alloy steel;

¹ These tariff classifications and statistical codes may include goods that are both subject and not subject to the anti-dumping measures. The listing of these tariff classifications and statistical codes are for convenience or reference only and do not form part of the goods description. Please refer to the goods description for authoritative detail regarding goods subject to the anti-dumping measures.

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Tariff Subheading	Statistical Code	Description
		b. "flattened circles" and "modified rectangles" as defined in Note 1(m) to Chapter 72
7228.30.90	40	<i>Containing indentations, ribs, grooves or other deformations produced during the rolling process</i>
7228.60	Other bars and rods	
7228.60.10	72	Goods, as follows: a. of high alloy steel; b. "flattened circles" and "modified rectangles" as defined in Note 1(m) to Chapter 72

The goods subject to the anti-dumping measures do not include:

- plain round bar;
- stainless steel; and
- reinforcing mesh.

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.

Table 2: Proposed MCC structure

Item	Category	Sub-category	Identifier	Sales Data	Cost Data
1	Prime	Prime	P	Mandatory	Optional
		Non-Prime	N		
2	Minimum yield strength specified by product standard (Mega Pascals or "MPa")	Less than or equal to 300	A	Mandatory	Mandatory
		Greater than 300 but less than or equal to 480	B		
		Greater than 480 but less than 550	C		
		Equal to or greater than 550	D		
3	Finished form	Rebar in length/straight	S	Mandatory	Mandatory
		Rebar in coil	C		
4	Nominal diameter (millimetres or "mm")	Less than 12	A	Mandatory	Optional
		Greater than or equal to 12 and less than or equal to 16	B		
		Greater than 16 and less than or equal to 32	C		
		Greater than 32 and less than or equal to 50	D		
5	Length (metres or "m")	Less than or equal to 6	1	Mandatory	Optional
		Greater than 6 and less than or equal to 12	2		
		Greater than 12	3		
		Coil product	C		
6	Deformation pattern along Length	Threaded	T	Mandatory	Optional
		Non-threaded	N		

In constructing a MCC, use a "-" between each category. For example: P-C-S-B-C-N

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

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and sell. The MCC may also be used to compare the export price to the cost to make the exported model as part of the constructed normal value.

If there are models manufactured and sold by your company that do not align within the MCC structure above, this should be raised by lodging a submission with the Commission as soon as is practicable, but no later than the time this questionnaire is due, otherwise the response may be deemed deficient.

SECTION A COMPANY INFORMATION

A-1 Company representative and location

1. Please nominate a contact person within your company:

Name: [REDACTED]
Position in the company: *Manager of Steel Manager Group*
Telephone: [REDACTED]
E-mail address: [REDACTED]

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

Name: *John Bracic (J.Bracic & Associates Pty. Ltd.)*
Address: *PO Box 3026, Manuka, ACT 2603, Australia*
Telephone: *61-0499-056-729*
E-mail address of contact person: *john@jbracic.com.au*

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

3. Please provide the location of the where the company's financial records are held.
69, Hasinbeonyeong-ro, Saha-gu, Busan Korea (Headquarter). All relevant electronic information can be accessed through DAEHAN STEEL's ERP (SAP) system.
4. Please provide the location of the where the company's production records are held.
Pyeongtaek Hang-ro, 268 Beon-gil, Poseung-eup, Pyeongtaek-si, Gyeonggi-do, Korea

A-2 Company information

1. What is the legal name of your business?
The Company's legal name is "DAEHAN STEEL CO., LTD." (hereinafter "DAEHAN STEEL")
2. Does your company trade under a different name and/or brand? If yes, provide details.
DAEHAN STEEL does not use any other business name while it sells the goods under consideration.
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.
Refer to Exhibit A-2.4.
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
DAEHAN STEEL is not a subsidiary of any other company. Refer to Exhibit A-2.5 for details of corporate structure.
6. Is your company or parent company publically listed?
If yes, please provide:
(a) The stock exchange where it is listed; and
(b) Any principle shareholders²
If no, please provide:
(a) A list of all principal shareholders and the shareholding percentages.
Yes. DAEHAN STEEL is a publically listed company. Refer to Exhibit A-2.6 for list of shareholders.

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.

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

DAEHAN STEEL is a steel manufacturer that produces square billet, deformed bar-in-length(DBIL), deformed bar-in-coil(DBIC), and processed rebar products sold to Korea and various export markets, including Australia.

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.

DAEHAN STEEL performs the above all functions in relation to the goods under consideration.

9. Provide your company's internal organisation chart.

Refer to Exhibit A-2.9.

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

DAEHAN STEEL's organizational structure consists of

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

All relevant documents relevant to DAEHAN STEEL's operations can be found at <https://www.idaehan.com/en/main>

A-3 General accounting information

1. What is your financial accounting period?

DAEHAN STEEL's fiscal year is the calendar year, January 1 to December 31.

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

Yes. DAEHAN STEEL's accounts are audited by Samil PwC.

3. What currency are your accounts kept in?

Accounts are kept in Korean Won.

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

DAEHAN STEEL uses SAP System.

5. What is the name of your sales system?

DAEHAN STEEL uses SAP System.

6. What is the name of your production system?

DAEHAN STEEL uses SAP System.

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

Not applicable.

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

DAEHAN STEEL maintains its financial records in accordance with the Korean International Financial Reporting Standards (K-IFRS).

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

DAEHAN STEEL has not changed any of the accounting methods used by the company over the last two financial 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.

Refer to Exhibit A-4.1.

2. If the financial statements in A-4.1 are unaudited, provide for each company:

- (a) the tax returns relating to the same period; and
- (b) reconciliation of the revenue, cost of goods sold, and net profit before tax between the financial statements and tax returns.

Not applicable.

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

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

Whilst Daehan Steel operates various cost centres within its cost accounting system, it does not maintain separate profit centres.

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.

Not applicable as financial period and review period are the same.

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

Refer to Exhibit A-4.5.

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

Refer to Exhibit A-4.6.

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

SECTION B EXPORT SALES TO AUSTRALIA

B-1 Australian export sales process

1. Provide details (and diagrams if appropriate) of the export sales process of your company and any entities (e.g. agents) including:
 - (a) Marketing and advertising activities
 - (b) Price determination and/or negotiation process
 - (c) Order placement process
 - (d) Order fulfilment process and lead time
 - (e) Delivery terms and process
 - (f) Invoicing process
 - (g) Payment terms and process

For export sales of the goods under consideration to Australia, DAEHAN STEEL had only one channel of distribution. Details of sales process are as follows:

DAEHAN STEEL carries out its export sales of the goods under consideration to Australia through unrelated trading companies during the review period.



All sales made by DAEHAN STEEL to trading companies are made on a [REDACTED] basis. The negotiation process starts with trading companies contacting DAEHAN STEEL to negotiate sales terms (i.e., [REDACTED]). Trading companies firstly issues purchase order to DAEHAN STEEL, and then DAEHAN STEEL confirms the contract after the finalization of negotiation between two parties. On contract date, these two parties agree upon all material terms of sale. This contract includes the [REDACTED].

Once this process is concluded, DAEHAN STEEL carries out the production of the goods, which are shipped to the destination indicated in the sales contract. DAEHAN STEEL issues the commercial invoice (or tax invoice) approximately on the [REDACTED] to trading companies.

2. In what currency do you invoice your customers for goods exported to Australia? If it is not in your local currency:
 - (a) Do your customers pay you into a foreign currency denominated account? If yes, provide details;
 - (b) Do you use forward contracts to lock in the foreign exchange rate relating to the export sales? If yes, provide details;
 - (c) How is the exchange rate determined in your accounting system and how often is it updated?

[REDACTED] basis. No forward contracts to lock in the foreign exchange rate. The exchange rate is updated every day in SAP system.

3. Are there any customers of the goods exported to Australia related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.

Not applicable.

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

Not applicable.

5. Do your export selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

The export selling prices do not vary according to the distribution channel identified. Rather, the selling prices are determined through individual negotiations between DAEHAN STEEL and its customers depending upon the market situation (e.g. supply and demand).

6. Did you provide on-invoice discounts and/or off-invoice rebates to any customer or an associate of the customer in relation to the sale of the goods exported to Australia during the period? If yes, provide a description and explain the terms and conditions that must be met by the customer to obtain the discount.

Not applicable.

7. Did you issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the goods exported to Australia during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

Not applicable.

8. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:
- What date are you claiming as the date of sale?
 - Why does this date best reflect the material terms of sale?

The contract dates are claimed as the date of sale. On contract date, these two parties agree upon all material terms of sale. This contract includes the [REDACTED]

DEAHAN STEEL submits that the contract date best reflects the date of sale as it is the date upon which DAEHAN STEEL and its customers agreed all material terms. Contract is secured for both parties by [REDACTED] issued by trading company through first class international bank. Also trading company's contract is governed by and construed in accordance with Laws of England and Wales and any disputes shall be referred to and finally resolved by arbitration under the rules of Singapore International Arbitration centre (SIAC). Irrevocable LC and English Laws with Arbitration in Singapore territory confirm that Date of contract is indeed date of sale irrespective of when invoice date. Hence DEAHAN STEEL would like to establish date of contract as date of sale since all material terms was established on the date of contract. No changes were made to the material terms of sale after the contract date.

Please note that the standard negotiated terms of sale include a tolerance for quantity. Analysis of the variance in the weights and unit price of all export sales to Australia during the review period is provided in Exhibit B-1.8. As evidenced, these are all within the weight tolerance agreed between the parties.

B-2 Australian sales listing

- Complete the worksheet named "B-2 Australian sales"
 - This worksheet lists all sales (i.e. transaction by transaction) exported to Australia of the goods invoiced within the period. This includes exports to Australia sold through a domestic customer.
 - 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.

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

[Refer to Exhibit B-2](#)

B-3 Sample export documents

1. Select the two largest invoices by value and provide the following documentation:
- Contracts
 - Purchase order and order confirmation
 - Commercial invoice and packing list
 - Proof of payment and accounts receivable ledger
 - Documents showing bank charges
 - Invoices for inland transport
 - Invoices for port handling and other export charges
 - Bill of lading
 - Invoices for ocean freight & marine insurance (if applicable)
 - Country of origin certificates (if applicable)

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

[Refer to Exhibit B-3](#)

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

[Refer to Exhibit B-4](#)

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

[Refer to Exhibit B-5](#)

PUBLIC VERSION

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.

DAEHAN STEEL exported deformed Bar-in-Coil (DBIC) only to Australia during the review period.

Concerning the details of the goods exported to Australia including product specification, please refer to DAEHAN STEEL's company brochure provided at Confidential Exhibit C-1 – Product brochure.

2. Provide a list of MCCs of the goods exported to Australia. This must cover all MCCs listed in the Australian sales listing in B-2.
 - This list must be disclosed in the public record version of the response.

Refer to Exhibit C-1.2 – Export MCC List

C-2 Models sold in the domestic market

1. Fully describe all like goods your company sold on the domestic market during the period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the like goods sold on the domestic market.

DAEHAN STEEL sold domestically both deformed bar-in-length (DBIL) and DBIC, in various grades, diameters and lengths. Please refer to DAEHAN STEEL's company brochure provided at Confidential Exhibit C-1 – Product brochure.

2. Provide a list of MCCs of like goods sold on the domestic market. This must cover all MCCs listed in the domestic sales listing in D-2.
 - This list must be disclosed in the public record version of the response.

Refer to Exhibit C-2.2 – Domestic MCC List

C-3 Internal product codes

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

If yes:

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

If no:

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

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DAEHAN STEEL maintains a product code (material item code) system to identify the specifications and key physical characteristics of all products and for inventory control purpose. DAEHAN STEEL uses this product code in the normal course of business and cost calculation. Please see Exhibit C-1 – Product code description, detailing coding structure as well as identifying product specifications. The same product coding system is used for both the Korean market and the export markets including Australia.

SECTION D DOMESTIC SALES

D-1 Domestic sales process

1. Provide details (and diagrams if appropriate) of the domestic sales process of your company and any other related entities including:
 - (a) Marketing and advertising activities
 - (b) Price determination and/or negotiation process
 - (c) Order placement process
 - (d) Order fulfilment process and lead time
 - (e) Delivery terms and process
 - (f) Invoicing process
 - (g) Payment terms and process

In the domestic market, DAEHAN STEEL sold [REDACTED]. The distribution channel can be summarized as follows:

[Confidential diagram removed]

DAEHAN STEEL sold most of like goods [REDACTED].

For the DBIC products, [REDACTED].

The terms of sales made by DAEHAN STEEL to its customers are on an "[REDACTED]" or "[REDACTED]" basis.

Barter Sales.

In its domestic sale listing at Exhibit D-1, DAEHAN STEEL has classified certain individual transactions of DBIC as 'Barter Sales'. These identify those transactions which involve payment being made by the domestic customer with [REDACTED]. By contrast, non-barter sales have been classified as 'Commercial Sales' in Exhibit D-1 which signifies that the domestic customer made a [REDACTED] for the goods.

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.
As noted in the previous response, DAEHAN STEEL makes a small volume of sales to its related company, DH Networks. Price to DH Networks is set in the same way as all unrelated customers

There is no difference in sales process or prices set, between or among classes of customers. DAEHAN STEEL typically receives orders from domestic market customers by telephone or e-mail or fax. Written purchase orders are not utilized by customers in the domestic market. When an order is received, DAEHAN STEEL's sales personnel check the ordered specification in accordance with inventory. DAEHAN STEEL does not issue any written confirmation of the order to the customer but DAEHAN STEEL's sales personnel enter the order information into its operating system (SAP) for sales and shipment management. If inventory does not exist, the domestic sales team issues a production request, which provides the information needed to allow the production team to fit the order into its production schedule. The merchandise is then produced to meet the order specifications in accordance with the production schedule. If inventory does exist to meet the customer's order, then instead of a production request DAEHAN STEEL's sales team issues a shipping order to make the ordered products ship to the customer. Also, DAEHAN STEEL generally issues a sales invoice together with tax invoice

to the customer. DAEHAN STEEL uses actual weight basis for invoice purposes. And then customers arrange payment to DAEHAN STEEL in accordance with the invoice.

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

For domestic sales, DAEHAN STEEL's personnel [REDACTED]. The final price is not different among customers or regions, but determined and varying according to the [REDACTED] between DAEHAN STEEL and the customers.

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.

DAEHAN STEEL's selling prices do not vary according to the distribution channel. Rather, the prices are established through [REDACTED] DAEHAN STEEL and its domestic customers.

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.

DAEHAN STEEL provides [REDACTED]. After that, DAEHAN STEEL [REDACTED]. The [REDACTED] calculation is provided in Appendix E-5.

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.

No credit or debit notes were issued. However, a small number of returns occurred during the period.

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:
- What date are you claiming as the date of sale?
 - Why does this date best reflects the material terms of sale?

Not applicable.

D-2 Domestic sales listing

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

Refer to Exhibit D-2 – Domestic sales.

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

Reported information was extracted directly from DAEHAN STEEL'S SAP system.

D-3 Sample domestic sales documents

1. Select the two largest invoices by value and provide the following documentation:
 - Contracts
 - Purchase order and order confirmation
 - Commercial invoice and packing list
 - Proof of payment and accounts receivable ledger
 - Documents showing bank charges
 - Delivery invoices

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

Refer to Exhibit D-3 – Domestic sample sales.

2. For each document, please annotate the documents or provide a table reconciling the details in the “D-2 Domestic sales” listing to the source documents in D-3.1.

Refer to Exhibit D-3 – Domestic sample sales.

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:
 - (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?
 - (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?

For domestic sales, payment terms are agreed with the customers at the time of sale and shown on DAEHAN STEEL's order information in the operating system (SAP). DAEHAN STEEL provides in Exhibit E-2 various payment terms offered to domestic customers. DAEHAN STEEL has reported in the field "Other factors (Credit expense)" its credit expenses which were calculated on a transaction-specific basis using the following formula:

Credit Expense = Net Invoice Value (KRW) x Credit Period / 365 x Short-term Interest Rate

DAEHAN STEEL [REDACTED] short-term borrowing denominated by Korean Won (KRW). Accordingly, DAEHAN STEEL reports short-term interest rate based on [REDACTED]. The calculation of Short-Term borrowing rate during the review period is provided in Exhibit E-1.

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

No. All payment terms for the export sales to Australia were [REDACTED].

E-2 Packaging

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

Not applicable. No packaging is used for domestic sales.

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

Not applicable. No packaging is used for export sales.

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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

This question is not applicable because DAEHAN STEEL did not incur any separate packing costs for export sales and domestic sales of the goods.

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?

For domestic sales, DAEHAN STEEL's terms of delivery are either "Ex-works" or "Delivered". In case of delivered terms, DAEHAN STEEL transports the goods by truck from its factory to the destination designated by the customer. DAEHAN STEEL used [REDACTED] to transport the goods. These inland transportation costs are reported on an average cost basis and recorded in "[REDACTED]" account (Account Code: [REDACTED]) or "[REDACTED]" account (Account Code: [REDACTED]) under DAEHAN STEEL's accounting system.

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

[REDACTED].

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?

DAEHAN STEEL has reported in this field the transaction-specific inland transport expense incurred to transport the goods from the factory to the port. DAEHAN STEEL used [REDACTED], to transport the goods. This inland transport expense is recorded in "[REDACTED]" account (Account Code: [REDACTED]) under DAEHAN STEEL's accounting system.

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?

Not applicable.

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 applicable.

6. If the delivery terms of the Australian sales includes delivered duty paid, how were the Australian importation and delivery costs calculated in the Australian sales listing in B-2?

Not applicable.

E-4 Other direct selling expenses

1. Do you provide sales commissions for domestic sales of like goods and/or export sales of the goods? If yes, provide details.

Not applicable.

2. Are there any differences in tax liability between domestic and export sales? If yes, provide details, for example:
 - What is the rate of value-added tax (VAT) on sales of the goods and like goods?

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- How is VAT accounted for in your records in relation to sales of the goods and like goods?
- Do you receive a VAT refund in relation to sales of the goods and/or like goods?
- Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?

Not applicable.

3. Are there any other direct selling expenses incurred by your company in relation to domestic sales of like goods?
 - These direct selling expenses must be included in the reconciliation of direct selling expenses in B-5

Not applicable.

4. Are there any other direct selling expenses incurred by your company in relation to export sales of the goods to Australia?
 - These direct selling expenses must be included in the reconciliation of direct selling expenses in B-5

Not applicable.

E-5 Other adjustment claims

1. Are there any other adjustments required to ensure a fair comparison between the export price and the normal value (based on domestic sales, costs and/or third country sales)? If yes, provide details.
 - An adjustment will only be made where there is evidence that the difference affects price comparability.
 - Refer to Chapter 15 of the *Dumping and Subsidy Manual (November 2018)* for more information.

Not applicable.

SECTION F THIRD COUNTRY SALES

F-1 Third country sales process

1. Are your sales processes to any third country (i.e. exports to countries other than Australia) different to the sales process described in B-1.1? If yes, provide details of the differences.

No. Similar to Australian exports.

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.

No.

3. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:
 - (a) What date are you claiming as the date of sale?
 - (b) Why does this date best reflect the material terms of sale?

Not applicable.

F-2 Third country sales listing

1. Complete the worksheet named "F-2 Third country sales"
 - This worksheet lists all export sales, summarised by country and customer, to third countries of like goods invoiced within the period.
 - If you have claimed in F-1.3 that the date of sale is one other than the invoice date, then add sales with your claimed date of sale.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Refer to Exhibit F-2 – Third country exports.

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

Reported information was extracted directly from DAEHAN STEEL'S SAP system.

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.

Differences include product specification (form, grade, diameter, length), delivery terms and payment terms.

SECTION G COST TO MAKE AND SELL

G-1. Production process

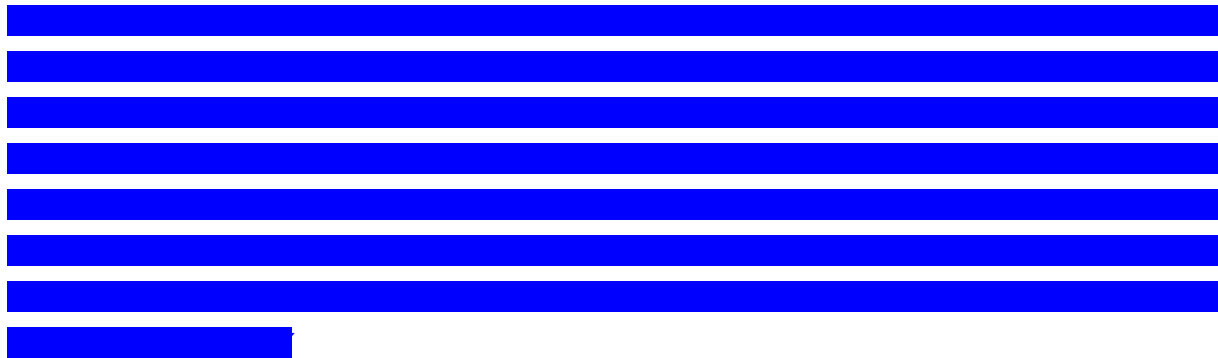
1. Describe the production process for the goods and provide a flowchart of the process. Include details of all products manufactured using the same production facilities as those used for the goods. Also specify all scrap or by-products that result from producing the goods.

The goods under consideration were produced at DAEHAN STEEL's three production facilities – (i) Shinpyeong Plant, (ii) Noksan Plant and, (iii) Pyeongtaek Plant.

A flow-chart of the production process for the product produced at three plants during the review period is provided in Exhibit G-1.1.

As the chart indicates, both the GUC and non-GUC are produced at these three facilities.

The following is a brief description of each of the production lines through which the GUC pass, depending on the final product being produced.



As is normal in the steel industry, [REDACTED] is both used and generated in the manufacture of the GUC and non-GUC.

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.

For production of the goods under consideration, [REDACTED] is used as the major raw materials. During the review period, DAEHAN STEEL purchased [REDACTED] from [REDACTED]

DAEHAN STEEL has provided in Exhibit G-7.2 the total value of the raw materials purchased from [REDACTED] suppliers during the review period and the percentage of the total cost of manufacturing accounted for by these inputs.

As demonstrated in Confidential Exhibit G-7.4, the purchase of major raw materials by DAEHAN STEEL from [REDACTED] represents a relatively small amount of the total cost of manufacturing which means that the purchases from [REDACTED] do not have any major impact on the manufacturing costs.

Concerning the raw material purchases, purchases of [REDACTED], is also provided in Exhibit G-7.6.

G-2. Cost accounting practices

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

Standard cost based system

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.

DAEHAN STEEL's cost accounting system is a standard cost based system in that the SAP structure mandates that companies develop standard costs. DAEHAN STEEL utilizes these standard costs for budget and planning purposes and to evaluate results during the month. However, DAEHAN STEEL calculates actual costs at month's end and adjusts the standard cost for the difference between the standard and actual costs. DAEHAN STEEL has used the actual costs recorded in its normal cost accounting system as the basis for the reported product costs. Each inventory code has a standard cost and the variances (purchase price and cost variances) are calculated by production order, accumulated and tracked through the production process by material code.

The actual cost of raw materials (i.e., [REDACTED] or [REDACTED]) is the [REDACTED] times the [REDACTED] during the month, adjusted for the [REDACTED] at the end of the month.

[REDACTED]

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.

The difference between the standard and actual cost by [REDACTED]. The methodologies used to allocate the costs incurred in these centres to the direct cost centres are summarized in Exhibit G-2.3

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

As explained in question G-2.2, DAEHAN STEEL's cost accounting system records its production cost by [REDACTED]. [REDACTED] contain the information of item type, product group, steel grade, nominal size, and item's attribute. Description of DAEHAN STEEL's material item code is provided in Exhibit C-3.

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:
- Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.
 - State the total cost of the start-up operation and the way that your company has treated the costs of the start-up operation in its accounting records.

Not applicable.

7. What is the method of valuation for raw material, work-in-process, and finished goods inventories (e.g. last in first out –LIFO, first in first out- FIFO, weighted average)?

All relevant practices pertaining to DAEHAN STEEL's inventory valuation methodologies are detailed in DAEHAN STEEL's financial statements submitted in this response.

Inventories are measured at the lower of cost and net realizable value. Costs are determined by using the moving-weighted average method. The cost of inventories comprise all costs of purchase, costs of conversion and other costs incurred in bringing the inventories to their present location and condition. When inventories are sold, the carrying amount of those inventories is recognized as cost of goods sold in the period in which the related revenue is recognized. Inventories are measured at the lower of cost and net realizable value. The amount of any write-down of inventories to net realizable value and all losses of inventories are recognized as an expense in the period the write-down or loss occurs. The amount of any reversal of any write-down of inventories arising from an increase in net realizable value is recognized as a reduction in the amount of inventories recognized as a cost of goods sold in the period in which the reversal occurs.

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

Damaged or sub-standard goods are valued and recorded at the [REDACTED].

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

DAEHAN STEEL's cost accounting treatment of [REDACTED] is to [REDACTED].

10. Are any management fees/corporate allocations charged to your company by your parent or related company? If yes, provide details

Not applicable.

G-3 Cost to make on domestic market

- Complete the worksheet named "G-3 Domestic CTM".
 - This worksheet lists the quarterly cost to make the domestic models of like goods by MCC manufactured within the period, even if they are models not exported to Australia.
 - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
 - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture like goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

- If you have claimed in B-1.8 and/or D-1.7 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all domestic sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.
2. Provide a table listing the source of the data for each column of the “G-3 Domestic CTM” listing.

Refer to Exhibit G-3

G-4 Selling, General & Administration expenses

1. Complete the worksheet named "G-4.1 SG&A listing".
- This worksheet lists all selling, general and administration expenses by account code for the most recent accounting period and the period.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Refer to Exhibit G-4.1 for Australian Sales and Domestic Sales

2. Complete the worksheet named "G-4.2 Domestic SG&A calculation".
- This worksheet calculates the unit domestic SG&A for each MCC.
 - You must provide this list in electronic format using the template provided.
 - Please use the formulas provided.

Refer to Exhibit G-4.2

G-5 Cost to make the goods exported to Australia

1. Complete the worksheet named "G-5 Australian CTM".
- This worksheet lists the quarterly cost to make the Australian models of the goods under consideration by MCC manufactured within the period.
 - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
 - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as ‘other costs’ if not already included, for example, under material costs.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
 - If you have claimed in B-1.8 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all Australian sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.
2. Provide a table listing the source of the data for each column of the “G-5 Australian CTM” listing.

Refer to Exhibit G-5

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

Refer to Exhibit G-2.3 – Summary of allocation basis.

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.

G-3 and G-5 are made with data from SAP system

G-7 Major raw material costs

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

██████████ is the primary raw material used by DAEHAN STEEL.

2. Are any raw materials sourced as part of an integrated production process or from a subsidiary company which your company exercise control? If yes, complete the worksheet named “G-7.2 Raw material CTM” for these raw materials.

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

No.

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

Refer to Exhibit G-7.3_Major Input Analysis during the POR.

4. For each raw material identified in G-7.3 which individually account for 10% or more of the total cost to make, complete the worksheet named “G-7.4 Raw material purchases”

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

Refer to Exhibit G-7.4_Raw material purchase.

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

Data is extracted directly from SAP.

6. For each raw material:

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

Refer to Exhibit G-7.6_Sample ██████████ purchases.

7. Are any of the suppliers in “G-7.4 Raw material purchases” listing related to your company? If yes, please provide details on how the price is set.

For production of the goods under consideration, ██████████ is used as the major raw materials. During the review period, DAEHAN STEEL purchased ██████████

DAEHAN STEEL has provided in Exhibit G-7.3 the total value of the raw materials purchased from ██████████ suppliers during the review period and the percentage of the

total cost of manufacturing accounted for by these inputs. As demonstrated, the purchase of major raw materials by DAEHAN STEEL from [REDACTED] suppliers represents a relatively small amount of the total cost of manufacturing which means that the purchases from [REDACTED] suppliers do not have any major impact on the manufacturing costs.

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

1. Please complete the worksheet named "G-8 Upwards costs" to demonstrate that the cost listings in G-3 and G-5 are complete.
 - You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Refer to Exhibit G-8

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.

Refer to Exhibit G-8

G-9 Capacity Utilisation

4. Please complete the worksheet named "G-9 Capacity Utilisation".
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Refer to Exhibit G-9