



Australian Government
Department of Industry, Science,
Energy and Resources

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**Anti-Dumping
Commission**

Exporter Questionnaire

THE PEOPLE'S REPUBLIC OF CHINA

Case number: 550

Product: Precision pipe and tube steel

From: The People's Republic of China, the Republic of Korea, Taiwan and the Socialist Republic of Vietnam

Investigation period: 1 January 2019 to 31 December 2019

Response due by: Thursday 7 May 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 an investigation into precision pipe and tube steel (the goods) exported to Australia from the People's Republic of China (China), the Republic of Korea (Korea), Taiwan and the Socialist Republic of Vietnam (Vietnam).

The Commission will use the information you provide to determine normal values and export prices over the investigation period (the period). This information will determine whether precision pipe and tube steel is dumped. The Commission will also use the information you provide to determine whether precision pipe and tube steel exported to Australia from China has been in receipt of countervailable subsidies 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.

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

Submitting a response to the exporter questionnaire

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

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

Confidential and non-confidential responses

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

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

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

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

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

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

Verification of the information that you supply

The Commission may wish to conduct a visit, if this option is available to the Commission, to your company to verify your questionnaire response for completeness, relevance and accuracy.

However, on 20 March 2020, the Commission published *Anti-Dumping Notice No. 2020/029*,¹ advising that onsite exporter verification activities have been temporarily suspended until further notice as a result of the COVID-19 pandemic.

The Commission remains committed to ensuring that data submitted by parties is complete, relevant and accurate. If an onsite visit is not possible, the Commission may elect to undertake alternative verification activities. This includes but is not limited to remote verification, desktop assessments or delaying verification activities until such time as onsite verification is possible. The Commission will

¹https://www.industry.gov.au/sites/default/files/adc/public-record/notice_adn_-_adn_2020-029_-_temporary_suspension_of_international_onsite_verification_0.pdf

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continue to monitor current events and assess when the suspension of onsite exporter verification activities can be lifted.

A verification visit, or any verification activity 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.

Onsite verification is usually conducted over 4 days, remote and desktop verification may take a longer period of time. In complex cases, a verification visit, if conducted, may be scheduled over 5 days. A desktop verification may require a longer period.

Any verification activity 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, should an onsite visit be possible, 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 activity.

A report will be prepared following the verification activity, which details the outcomes of the verification. This report will be placed on the public record and may include the publication of the preliminarily-assessed dumping 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.

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	x
Section B Export sales to Australia	x
Section C Exported goods& like goods	x
Section D Domestic sales	x
Section E Due allowance	x
Section F Third country sales	x
Section G Cost to make and sell	x
Section H Particular market situation	x
Section I	x
Section J Production AND Production Costs	x
Section K Australian Market	x
L-1 General Countervailing	x
Section L Exporter's declaration	x
Non-confidential version of this response	x

Attachments	Please tick if you have provided spreadsheet
B-2 Australian sales	x
B-4 Upwards sales	x
B-5 Upwards selling expenses	x
B-6 Historical sales	x
D-2 Domestic sales	x
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"/>
G-9 Capacity utilisation	<input type="checkbox"/>
L-1 Company turnover	x

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L-3 Income tax	<input checked="" type="checkbox"/>
L-4 Grants	<input type="checkbox"/>
L-5 VAT and tariff transactions	<input type="checkbox"/>
L-6 Preferential Loans	<input type="checkbox"/>

GOODS UNDER CONSIDERATION

The goods under consideration (the goods) i.e. the goods exported to Australia, allegedly at dumped prices and/or in receipt of countervailable subsidies, are:

Certain electric resistance welded pipe and tube made of carbon steel, whether or not including alloys, comprising circular, rectangular and square hollow sections in metallic coated and non-metallic coated finishes. Metallic finish types for the goods include galvanised and aluminised. Non-metallic finishes include hot-rolled and cold-rolled.

Sizes of the goods are, for circular products, those equal to or less than 21 millimetre ("mm") in outside diameter. Also included are air heater tubes to Australian Standard (AS) 2556, up to and including 101.6 mm outside diameter.

For rectangular and square products, those with a thickness of less than 1.6 mm (being a perimeter up to and including 260 mm).

Included within the goods are end-configurations such as plain, square-faced and other (e.g. threaded, swaged and shouldered).

The goods include all electric resistance welded pipe and tube made of steel meeting the above description of the goods (and inclusions), including whether the pipe or tube meets a specific structural standard or is used in structural applications.

Oval and other shaped hollow sections which are not circular, rectangular or square, are excluded from the goods.

Tariff Classification

The goods may be classified in Schedule 3 to the *Customs Tariff Act 1995* as follows:

Tariff Subheading	Statistical Code	Description
7306	OTHER TUBES, PIPES AND HOLLOW PROFILES (FOR EXAMPLE, OPEN SEAM OR WELDED, RIVETED OR SIMILARLY CLOSED), OF IRON OR STEEL:	
7306.30.00	Other, welded, of circular cross-section, of iron or non-alloy steel:	
	30	Not exceeding 21 mm external diameter
7306.50.00		
	45	<i>Other, welded, of circular cross-section, of other alloy steel</i>
7306.6	Other, welded, of non-circular cross-section	
7306.61.00	<i>Of square or rectangular cross-section, of iron or non-alloy steel, not exceeding 279.4 mm perimeter:</i>	
	21	Wall thickness not exceeding 2 mm

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Model Control Code

Details of the model control code (MCC) structure for the goods are 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.

	Category	Sub-Category	Identifier	Sales Data	Cost Data
1	Prime	Prime	P	Mandatory	Not applicable
		Non-Prime	N		
2	Steel Base/Type * Batch Hot Dipped Galvanised abbreviated as 'Batch HDG'; Electro Galvanised abbreviated as 'EG'; Continuously Galvanised abbreviated as 'CG'; Mild Steel Galvabond as 'MSGB'.	Hot Roll	H	Mandatory	Mandatory
		Cold roll (Semi Bright)	C		
		Galvanised (Batch HDG, EG, CG or MSGB)	G		
		Other (e.g. alloy steel)	A		
3	Steel Grade	C200	1	Mandatory	Mandatory
		C250	2		
		C350	3		
		C450	4		
		Other	5		
4	Surface Protection	Oiled	O	Mandatory	Mandatory
		Clear or painted	P		
		No oil or paint	N		
5	Coating Mass	<20 g/m ² (including none)	1	Mandatory	Mandatory
		≥20 g/m ² to <100 g/m ²	2		
		≥100 g/m ² to <275 g/m ²	3		
		≥275 g/m ²	4		
6	Shape	Circular	C	Mandatory	Mandatory
		Rectangular or Square	R		
7	Circular size * outside diameter ** Circular products with an outside diameter between >21 mm to ≤101.6 mm which are not air heater tubes are not the goods.	Not circular	N	Mandatory	Mandatory
		≤16 mm	1		
		>16 mm to ≤21 mm	2		
		>21 mm to ≤101.6 mm (Air Heater Tubes)	3		
8	Rectangular/Square size * outside perimeter	Not rectangular/square	N	Mandatory	Mandatory
		≤40 mm	1		
		>40 mm to ≤80 mm	2		
		>80 mm to ≤260 mm	3		
9	Thickness	<1.6 mm	A	Mandatory	Mandatory
		≥1.6 mm to <3.2 mm	B		
		≥3.2 mm	C		
10	Length	≤4 m	1	Mandatory	Optional
		>4m to ≤8 m	2		
		>8 m to ≤12.0 m	3		
		>12.0 m	4		
11	End configuration	Plain end	P	Optional	Optional
		Threaded/flanged/swaged	T		
		Other (e.g. square faced)	O		

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In constructing a MCC, use a "-" between each category. For example: **P-H-2-O-1-C-1-N-A-3-P**

The MCCs will be used to model match export models to the identical or comparable domestic models. In addition, the MCCs will be used to determine the profitability of domestic sales in the ordinary course of trade test by comparing domestic selling prices to the corresponding cost to make and sell. The MCC may also be used to compare the export price to the cost to make the exported model as part of the constructed normal value.

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

SECTION A COMPANY INFORMATION

A-1 Company representative and location

1. Please nominate a contact person within your company:
Name: [REDACTED] (Confidential)
Position in the company: Sales Manager
Telephone: [REDACTED] (Confidential)
E-mail address: [REDACTED] (Confidential)
2. If you have appointed a representative, provide their contact details:
Name: [REDACTED] (Confidential)
Address: [REDACTED] (Confidential)
Telephone: [REDACTED] (Confidential)
E-mail address: [REDACTED] (Confidential)

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

3. Please provide the location of where the company's financial records are held.
: 90 Huang Shan road, Etdz Yantai, China
4. Please provide the location of where the company's production records are held.
: 90 Huang Shan road, Etdz Yantai, China

A-2 Company information

1. What is the legal name of your business?
: Yantai Aoxin International Trade Co., Ltd.
2. Does your company trade under a different name and/or brand? If yes, provide details.
: No.
3. Was your company ever known by a different legal and/or trading name? If yes, provide details
: No.
4. Provide a list of your current board of directors and any changes in the last two years.
: We do not have board of directors inside the company
5. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint-ventures)? If yes, provide:
: [REDACTED] (confidential)
: [REDACTED] (confidential)
: [REDACTED] (confidential)
: [REDACTED] (confidential)
6. Is your company or parent company publicly listed?
If yes, please provide:
: No
(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.

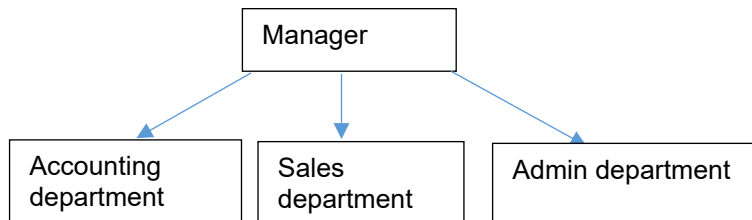
[REDACTED] (confidential)
: [REDACTED] (confidential)
: [REDACTED] (confidential)
: [REDACTED] (confidential)

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.
: Our company is a steel trading company, we keep large floor stocks in our warehouse including precision steel tube/pipe, steel tube, anglebar, structural steel beam, flat bar, steel plate. Our products are sourced from steel mills and other steel distributor regularly. Our company also offer steel processing for our customers, we can cut the steel to certain lengths, and sending to powder coating the steel based on customer requirement.

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;
: Our company does not produce, the main steel producer we are sourcing is Tianjin Tia Ying Tai Steel Pipe Co., Ltd, and it is address is No.14 Hengtai Road, Daqiu Zhuang Town, Jinghai Area, Tianjin City, China, our company also source the steel tube and pipe from other steel distributors.
- (b) sell in the domestic market;
: Our company sells in the local market
- (c) export to Australia; and
: Our company export to Australian market
- (d) export to countries other than Australia.
: Our company currently not export to other country other than Australia

9. Provide your company's internal organisation chart.



10. Describe the functions performed by each group within the organisation.
: The manager of the company is in charge of general managing of the company including human resource and dealing with our suppliers.
: Accounting depart is in charge of accounting and financial control and also auditing the company's cash flow.
: Sales department is in charge of dealing with customers, monitoring market price.
: Admin depart is helping manager to manage the company.

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

: No, we do not have promotional material, we used to use Alibaba.com to promote our company internationally, but now we do not use any promotional material.

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.

A-3 General accounting information

1. What is your financial accounting period?
:01/01/2019 to 31/21/2019
2. Are your financial accounts audited? If yes, who is the auditor?
: Yes, our financial report has been audited, Audited report has been lodged
3. What currency are your accounts kept in?
: Chinese Yuan
4. What is the name of your financial accounting system?
: Yongyou
5. What is the name of your sales system?
: Huasen
6. What is the name of your production system?
: No, we do not manufacture
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.
: Manuallyimpute the sales information into the accounting system
8. Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If yes, please provide details.
: No
9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.
: No

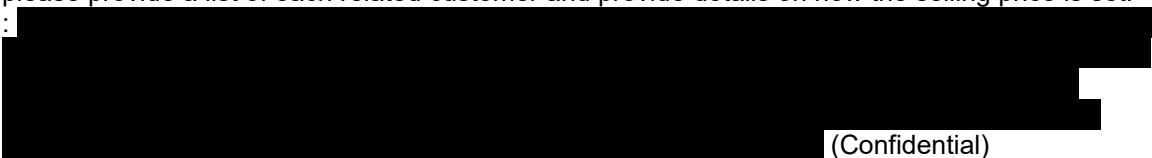
A-4 Financial Documents

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 "A4.1-ANNUAL REPORT"
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.
3. Does your company maintain different profit centres? If yes, provide profit & loss statements for the profit centre that the goods fall into for:
: No other profit centres
4. If the period is different to your financial period, please provide:
: No other profit centres
 - (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.
5. Please provide a copy of your company's trial balance (in Excel) covering the period and the most recent financial year.
: Please refer A4.5 "Trial balance for recent financial report"
6. Please provide your company's chart of accounts (in Excel).

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
: We previously used Alibaba to promote our company international, but we already suspended the promotion campaign as we try to reduce our cost.
 - (b) Price determination and/or negotiation process
: Our selling price is based on the market price by that time.
Every time Focus steel will give us a call or send us message to check our selling price and stock level first, and if they are satisfied with the price, they will process the order later. Sometime we will also process the precision steel to shorter lengths and powder coating with different colour based on customer's requirement.
 - (c) Order placement process
: Customers will call us or send us message to confirm the order after checking the price and stock level with us. We would send them quote confirmation later, and organise the container loading and shipment after they agreed with the quote and sells terms.
 - (d) Order fulfilment process and lead time
: The order fulfilment time normally take 2-3 business days for us the packed up, however if customer need us to process the steel such as cutting and send to powder coating, it will take 5 to 10 business days to process the order.
 - (e) Delivery terms and process
: It normally takes 4-5 weeks for us to deliver the stock to our customer's warehouse, and if customer need, we process the steel, such as cutting and powder coating, it will take 5-6 weeks to delivery to customer's warehouse.
 - (f) Invoicing process
: After the shipment, we will issue invoice to customer.
 - (g) Payment terms and process
: The payment term normally will be 3 months or 6 months after we issue the invoice, and the payment terms will be up to two sides negotiation.
2. In what currency do you invoice your customers for goods exported to Australia? If it is not in your local currency:
: We and our customers use Australian dollars to settle.
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.
:

(Confidential)
4. If sales are in accordance with price lists or price extras list, provide copies of these lists.
: Please Refer "B1.4 Sale Price List for Tube" (Confidential)
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.
: No, we treat our customers all the same.
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,

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provide a description and explain the terms and conditions that must be met by the customer to obtain the discount.

: We do not provide rebate or discount to our customer

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.
: No
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:
: No

B-2 Australian sales listing

1. Complete the worksheet named "B-2 Australian sales"
 - This worksheet lists all sales (i.e. transaction by transaction) exported to Australia of the goods invoiced within the period. This includes exports to Australia sold through a domestic customer.
 - 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.
2. Provide a table listing the source of the data for each column in the "B-2 Australian sales" listing.

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.

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.
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.
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 expenses” 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.

B-6 Historical sales listing

1. Complete the worksheet named “B-6 Historical sales”
 - This worksheet lists the totals of all sales for each product code exported to Australia of the goods in each calendar year for 2016, 2017 and 2018. This includes exports to Australia sold through a domestic customer.
 - You must provide this list in electronic format using the template provided.
2. Provide a table listing the source of the data for each column in the “B-6 Historical sales” listing.

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.

: Our precision pipe exporting to Australian are low grade steel, thinner tube for non-structure use, Customer buy our steel for fencing. We cut the tube to different lengths including 1.8,2.4,3.6 and 6 meters, and some of the tubes have been powder coated before exporting to our customer. For the powder coated tube, we send to local powder coating company after we cutting the steel. And we will pick the tube from the powder coating company, and packed them up in our warehouse, and ship with other precision tube together. The precision tubes we normally export or process for our customer are our floor stocks, as a steel trading and whole sale company, we stock lots of different steels in our warehouse.

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.

MCC: N-G-1-N-2-R-N-3-A-2-O

: N-G-1-P-2-R-N-3-A-1-O

: N-G-1-N-2-R-N-3-A-2-O

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.

: We sell similar precision tube in local market;our customer buys these tubes mainly for fence and small handy jobs. The grade sold in the local market, is mainly C200 an C250 for non-structure use. Some customers also need we cut the tube to the size such as 1.8m,2.4m, and 3.6m, but most time we sell the standard length as 6 meters.

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.

C-3 Internal product codes

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

If yes:

: No

If no:

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

: In our system, we just simply use the product name, grade, thickness, and length to record the product.

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
: Our company use Website, Alibaba as the advertising media to promote our company, and but mainly we use phone call and visit customers to sell our products.
 - (b) Price determination and/or negotiation process
:The selling price is based on the market price, however for large quantity, we will give some discount based on the market price, however the price is also depends on the market condition, and quantity required by customers, so we do not have specific price model to decide the selling price.
 - (c) Order placement process
:Normally we will get phone call or fax from customers to check the price and our stock level, after that if our customers are satisfied, they will issue the order, for large quantity, we will issue the contract before the payment, however for the small order, the customer will just make the payment before or after the purchase (depends on the initial agreement between our company and customers).
 - (d) Order fulfilment process and lead time
: For most of the time, since we are steel wholesaler and distributor in our area, we have large floor stock kept in our warehouse, so most times our customer do not need to wait for the steel. However, for some time we run out of our stock, the customer will have to wait for our new stock come in which will normally take 1-2 weeks.
 - (e) Delivery terms and process
: Normally our Delivery terms will take 2-5 business days depends how urgency the customer needs the steel.
 - (f) Invoicing process
: The invoice normally will be issued before the end of the month which customer make purchase;however, it also depends the requirement in the contract with customers.
 - (g) Payment terms and process
:Normally if customer agree the price and decide to go ahead with the purchase, we will hold the steel for 2-3 business days before the payment has been made(sometime the payment terms can be flexible depending the customer's requirement), and after the payment or confirmation(normally there will be official contract signed by both sides if there is no payment in advance), we will pack the steel up for customer's pick up or delivery.
2. Are anydomestic 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. If sales are in accordance with price lists or price extras list, provide copies of these lists.
: Please refer to "sales price list for tube"
4. Do your domestic selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

:No, generally we treat our customers all the same, the price is based on the market price for each period, as the local market has very serious competition all the time, and price almost change every day, so we have to follow the market price every day to compete with other suppliers.
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

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description; and explain the terms and conditions that must be met by the importer to obtain the discount.

: No, we do not provide on-invoice or off-invoice rebate so far.

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.
: Before the payment due day, we will issue credit notes to customer to warn them the payment final day. But this only applies the cases which customers do not pay in advance, and by the final days, there is still some payments have not been made.
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?
: Some time we will take the contract date as the date of sale.
 - (b) Why does this date best reflect the material terms of sale?
: The reason is because we think the once both sides sign the contract, the sales are legally settled up.

D-2 Domestic sales listing

1. Complete the worksheet named "D-2 Domestic sales"
 - This worksheet lists all domestic sales (i.e. transaction by transaction) of like goods invoiced within the period, even if they are models not exported to Australia
 - 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.
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.

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.

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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, normally customers have to make the payment before getting the steel, however for only some customer with signed contract we allow them paying later.
 - (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:
: No
 - 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?
: Same as the one year borrowing rate as the commercial bank.
 - (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?
: No
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:
: No, as the general practice of international trading, we normally require our customer make the payment in 180 days after the shipment, however there is no interest surcharge for the 180 days. As the selling price for exporting will normally be higher comparing with local selling for cover potential exchange rate, credit and other financial risks.
 - (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:
: No
 - 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 account's 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?
: No
 - 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

E-2 Packaging

1. What is the packaging used for your domestic sales of like goods?
: Steel strap
2. What is the packaging used for your export sales of the goods to Australia?
: Steel strap
3. If there are distinct differences in packaging between your domestic and export sales:
: No difference
 - (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

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?
: Most of sales, customer will pick up themselves, even we organise the delivery, the customers will pay the transport company straight way.
2. What are the delivery terms of the export sales of the goods to Australia?
:5-6 Weeks depending on the customer's requirement and shipping date.
3. If the delivery terms of the Australian sales include delivery to the port, how were the inland transport and port charges calculated in the Australian sales listing in B-2?
: The cost is using the total weigh of the goods timing the average cost of exporting product.
4. If the delivery terms of the Australian sales include ocean freight, how was the ocean freight cost calculated in the Australian sales listing in B-2?
: The cost is using the total weigh of the goods timing the average cost of exporting product.
5. If the delivery terms of the Australian sales include marine insurance, how was the marine insurance calculated in the Australian sales listing in B-2?
: The cost is using the total weigh of the goods timing the average cost of exporting product.
6. If the delivery terms of the Australian sales include delivered duty paid, how were the Australian importation and delivery costs calculated in the Australian sales listing in B-2?
: The cost is using the total weigh of the goods timing the average cost of exporting product.

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.
: No
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?
:13%
 - How is VAT accounted for in your records in relation to sales of the goods and like goods?
: Our selling price is VAT included.
 - Do you receive a VAT refund in relation to sales of the goods and/or like goods?
Yes, the refund rate during the investigation period is 10%.
 - 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
: No

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.

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- 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
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:
: No
 - (a) What date are you claiming as the date of sale?
 - (b) Why does this date best reflect the material terms of sale?

F-2 Third country sales listing

1. Complete the worksheet named "F-2 Third country sales"
: No
 - 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)
3. : No third country sales

F-3 Differences in sales to third countries

1. Are there any differences in sales to third countries which may affect their comparison to export sales to Australia? If yes, provide details.
: No third country sales

SECTION G COST TO MAKE AND SELL

G-1. Production process

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

G-2. Cost accounting practices

1. Is your company's cost accounting system based on actual or standard costs (budgeted)?
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.
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.
4. To what level of product specificity (models, grades etc.) does your company's cost accounting system normally record production costs?
5. Are there any costs for management accounting purposes valued differently to financial accounting purposes? If yes, provide details of the differences.
6. Has your company engaged in any start-up operations in relation to the goods? If yes:
 - (a) Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.
 - (b) State the total cost of the start-up operation and the way that your company has treated the costs of the start-up operation in its accounting records.
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)?
8. What are the valuation methods for damaged or sub-standard goods generated at the various stages of production?
9. What are the valuation methods for scrap, by products, or joint products?
10. Are any management fees/corporate allocations charged to your company by your parent or related company? If yes, provide details

G-3 Cost to make on domestic market

1. Complete the worksheet named "G-3 Domestic CTM".
 - This worksheet lists the quarterly cost to make the domestic models of like goods by MCC manufactured within the period, even if they are models not exported to Australia.
 - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
 - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture like goods, report the costs excluding the imputation tax. All other taxes payable

(e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.

- You must provide this list in electronic format using the template provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.
- If you have claimed in B-1.8 and/or D-1.7 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all domestic sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.

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".
 - 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".
 - 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".
 - 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
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-7 Major raw material costs

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

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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-7.2Raw 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.
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-7.3which individually account for 10% or more of the total cost to make, complete the worksheet named “G-7.4Raw 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.
 - (b) Reconcile the total value of the purchases listed in “G-7.4 Raw material purchases” 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.

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.
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”.
 - 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 PARTICULAR MARKET SITUATION

The applicant has claimed that the situation in the market of the country of export is such that sales in that market are not suitable for use in determining normal value. The information provided in sections H, I J and K will assist the Commission to better understand the Chinese and Australian markets and to assess whether sales in the Chinese market are suitable for determining a normal value.

H-1 Reporting requirements

1. Describe generally all interaction that your business has with the Government of China (GOC) at all levels, including (but not limited to):
 - (a) reporting requirements;
 - (b) payment of taxes;
 - (c) senior management representation within your business;
 - (d) supervision by the State-owned Assets Supervision and Administration Commission (SASAC) or a body under the control of SASAC.
 - (e) approval/negotiation of business decisions (e.g. investment decisions, management decisions, pricing decisions, production decisions, sales decisions);
 - (f) licensing;
 - (g) restrictions on land use;
 - (h) provision of loans; or
 - (i) provision of grants, awards or other funds.

: Our company does not have interaction with government, our income tax rate is 10% during the investigation period, and

In addition to paying tax to government, we do not have interaction with government.

H-2 Business structure, ownership and management

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

: No, our company is not state-owned or invested company.
2. List the Board of Directors and Board of Shareholders of your business and all other entities/businesses your business is related to.

: We do not have Board of directors
3. Indicate the names of common directors and officers between your business and related businesses, where applicable.

: [REDACTED] (Confidential)
4. Are any members of your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders representatives, employees, or otherwise affiliated with the Government of China (at any level, from any agency, party, or otherwise associated entity, including SASAC)? If yes, identify the individuals, their role on that Board and their affiliation with the Government of China.

: No
5. Does your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders have a representative from the Chinese Communist Party (CCP)? If yes, identify their name and title and indicate their position at the board level.

: No
6. Are any members of your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders appointed, managed or recommended by the Government of China? If yes, identify any relevant government department(s) they are affiliated with.

: No
7. Indicate who owns what percentage of all shares in your business and identify whether they are:

: [REDACTED] (confidential)

: [REDACTED] (confidential)

: [REDACTED] (confidential)

: Sun caihou:0.47%(confidential)

For all the shareholders, there is no one from the government or foreign investor or company employee.

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

:

[REDACTED] (Confidential)

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

: No one act on behalf of Government of China authorities.

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

: No requirement for our company.

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

: Our company is not public company.

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

: Our company is not public company.

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

: Wang meiyu

14. Do any of your company's senior managers hold positions in any Government of China departments or organisations, associations or Chambers of Commerce? If yes, describe the nature of these positions.

: No one of the company holds that kind of position.

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

: We do not have pricing committee inside the company.

H-3 Licensing

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

Please refer to "H 3.1 Business License" (Confidential)

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

: Industrial and Commercial Administration

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

: Just go to the office and fill up the form

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

: No specific conditions

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

: We can only do wholesale, retail of food, poultry products, and trading of fruit, meat, steel, wood, hardware, chemicals, and general import and export business.

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

: We do not familiar the sanctions.

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

: We can carry normal business, with no extra benefits.

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

: We do not familiar the circumstances for license removed.

H-4 Decision-making, planning and reporting

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

: No decision making for the goods as we are not manufacture.

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

: We are not manufacture.

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

: We are not manufacture.

- List and describe all reports that must be submitted to the Government of China periodically by your company, and identify the government department/office where each report is filed.

: We are not manufacture.

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

: We are not familiar with policy as we are not the manufacture.

- Does your business develop any five-year plans or similar planning documents? If yes, provide copies of these plans and advise whether these plans have been submitted, reviewed or approved by the Government of China (including the National Development and Reform Commission).

: No

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

: No minutes recorded

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

: No company meetings notes recorded.

H-5 Financial and investment activities

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

: No debt funded

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

: No debt funded

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

: No

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

: No

- a. explain what instruments were used;

- b. identify the type (e.g. government guarantee) and provider of the security; and
 - c. explain the reasons for raising the capital.
5. Does your business have policies on how cash reserves are to be invested? If yes, provide details.
: No
6. Has your business invested in either government or non-government debt securities (such as bonds, quasi-government bonds)? If yes, provide details (e.g. type of instrument, amount invested and the expected rate of return).
: No

H-6 Government policy on the industry

1. Are there any Government of China opinions, directives, decrees, promulgations, measures, etc. concerning the industry of the goods that were put in place or operating during the period? If yes, please provide:
 - a. copy of the documentation and a translation in English;
 - b. documentation concerning the Government of China or any association of the Government of China's notification of the measures concerning the goods to your company during the period.: As a trading company, we do not know the government's policy on the industry.
2. Provide information concerning the name of any Government of China departments, bureaus or agencies responsible for the administration of all Government of China measures concerning the industry of the goods in the regions, provinces or special economic zones where your company is located, including contact information regarding the following areas:
 - industrial policy and guidance on the industry;
 - market entry criteria for the industry;
 - environmental enforcement for the industry;
 - management of land utilisation;
 - the China Banking Regulatory Commission for the industry;
 - investigation and inspection of expansion facilities;
 - the section in the National Development and Reform Commission that is responsible for the industry; and
 - import licensing for raw materials relating to the goods under consideration.: As a trading company, we do not know these kinds of information.
3. Describe any role your company plays in the development of government's industrial plans and/or policies at all levels of government. For example, does your company provide information for, or request inclusion in, any plans, policies, or measures?
: We are not involved of government's policy decisions.
4. Does your company provide information relating to assessments of the implementation of the plan, policy or measure?
: No
5. Has the Government of China designated your company and/or industry as "pillar," "encouraged," "honourable," or any other designation? If yes, please answer the following questions.
 - a. Explain the purpose of these designations, the criteria for receiving any such designation, and the benefits or obligations that arise from each such designation.
 - b. Is there any connection between these designations and five-year plans or other industrial and/or economic policies or administrative measures?
 - c. Describe any instances in which your company cited Government of China plans, policies, or measures as support for receiving the financing that you report.: No

H-7 Taxation

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

: No export taxes on the exports of the goods during the period.

2. What was the value-added tax rebate applicable to exports of the goods during the period?
:10%
3. Have there been any changes to the value-added tax rebate applicable to exports of the goods in the last 5 years? If yes, provide:
: No.
 - a. a detailed chronological history of the value-added tax rebate rates;
 - b. products affected;
 - c. the effective dates of the rate changes;
 - d. fully translated copies of any Government of China notices regarding these changes, including the relevant appendices.
4. Are you aware of any tax changes being planned that would impact the industry?
: No, we are not aware of any tax changes being planned that would impact the industry.

H-8 Sales Terms

1. Identify the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by your business.
: [REDACTED] is the sales manager inside the company, and setting up the sales terms (Confidential)
2. Explain how the selling prices of the goods under consideration by your business are determined, including any Government of China involvement in your business' pricing decisions, and indicate if the goods are subject to Government of China direct or indirect pricing or government guidance pricing.

: Our selling price is based on the marketing price, and also, we will think about the quantity of customer's order and our previous purchase price.
3. Does your business coordinate the selling prices or supply of the goods with other domestic producers or any Government of China departments? If yes, provide details.
: No, we do not coordinate the selling prices with other domestic produces or China departments.
4. Explain whether your business provides information or data to the Government of China, other government officials or commercial/industry organisations, including those outside of China, which report on the industry.
: No, our company do not provide information or data to the government of China or other agencies and government officials inside or outside of China
5. Explain whether your business provides price data to any other person at the provincial, regional or special economic zone level of government.
: No, our company do not provide any price data to any person at any level of government.

H-9 Industry associations

1. Is your business a member of any business or industry associations? If yes, explain your business' relationship with the association and the involvement of the Government of China with the associations.
: No, our company is not involved in any kind of business or industry association.
2. If your business is a member of an industry association, indicate whether this membership is voluntary or compulsory. Explain the functions that the association provides for your business. Explain in detail the role of the association with respect to the directives as provided by the Government of China concerning the industry.
: No, our company is not involved in any kind of business or industry association.

H-10 Statistics submission/recording

1. Indicate if your business makes submissions to the Chinese Bureau of Statistics and/or any other government organisation. If yes, explain the purpose of these submissions and the type of information submitted.
: No, our company does not make any submissions to the Chinese Bureau of Statistics or any other government organisation.
2. Provide a recent example of a submission that has been made to the Bureau of Statistics and/or any other government organisation. For example, monthly data relating to sales, production and costs.
:our company does not make any submissions to the Chinese Bureau of Statistics or any other government organisation.
3. Do the organisations approve or assess your submission? If yes, provide a detailed explanation.
:our company does not make any submissions to the Chinese Bureau of Statistics or any other government organisation.
4. Do the organisations provide feedback on your submission? If yes, provide a detailed explanation.
:our company does not make any submissions to the Chinese Bureau of Statistics or any other government organisation.

H-11 Production/output

1. Is any part of your production subject to any national/regional industrial policy or guidance? If yes, provide details including a background of the policy/guidance and explain any restriction imposed by the policy/guidance. To what extent are any of the policies/guidelines applicable to your business?
: No, our company is not manufacture, we do not know the national/regional industrial policy.
2. Where applicable, how did your business respond to the policies/guidelines?
: No, our company is not manufacture, we do not know the national/regional industrial policy.
3. Provide details regarding any other restrictions (e.g., geographic/regional, downstream, use, etc.) to the sale of the goods and/or like goods that may be imposed by the Government of China.
: There are no restrictions for us to sell the goods.
4. Provide a list of all your domestic customers of the like goods, include the location (city and province) of the customer and indicate whether each customer is an SIE.
5. Are there any restrictions and/or conditions in relation to the quality or quantity of the production of the goods placed upon your business? If yes, provide details.
: We need to provide mill certification for the selling product.
6. Does your business require an export licence? If yes, provide details.
: Yes, for exporting company, we need register as a company having exporting quality.
7. Are the goods sold by your business subject to any export restrictions and/or limits during the previous 5 year? If yes, provide details.
: No, we have no restrictions or limit to sell the goods during the previous 5 years.
8. Provide details regarding any other restrictions (e.g., geographic/regional, downstream, end use) placed upon your business on the sale of the goods.
: There are no restrictions.
9. Have there been any changes to your production capacity over the last 5 years? If yes, provide details.
: No, our company is not a manufacture.

10. Does your business benefit from any concession on the purchase of any utility services (e.g. electricity, gas, etc.)? If yes explain the nature and the amount of the concession?
: No, there is no concession to us.

H-12 Sales price

1. Explain whether your business has been subjected to any direct or indirect price guidance or controls by the Government of China during the period.
: No, our company has not been subjected to any price guidance of the Government of China at any level during the period.
2. Explain whether your business has been subjected to any direct or indirect price guidance or controls by the Government of China during the period, with respect to raw material inputs.
3. : No, our company has not been subjected to any price guidance of the Government of China at any level during the period with respect to raw material inputs.
4. Explain whether your business has encountered any price guidance or controls established by regional, provincial or special economic zone officials and/or organisations.
: No, there is no price guidance for us by any organisations at any level.
5. Describe in detail how the selling price of the goods is determined. In particular, provide details of any restrictions, limitations, or other considerations imposed on your business.
: Our price is based on the marketing price. We will think about our competitor's selling price, quantity of customer's order, and also our previous purchase price.
6. Which organisation/business entity do you consider as the price leader of the goods?
: We do not know any organisation/business entity leading the price.
7. Does your business have a pricing committee in respect of the goods? If yes, provide the names and positions of all members of the committee.
: No, we do not have price committee.
8. How often does the pricing committee meet to discuss selling prices of the goods? Provide the minutes or any other relevant documents of all meetings of the pricing committee during the period.
: No, we do not have price committee.
9. Identify the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by your business.
: [REDACTED] is the sales manager in the company and looking for the sales term and price (Confidential)
10. If you have production facilities of the goods in more than one region and/or province, are the laws and regulations in each region the same with respect to pricing of the goods? If no, provide details on the differences.
: No, our company is not the manufacture.

H-13 Adding capacity and/or joint ventures

1. Provide a detailed explanation with respect to the government approval process on adding capacity and/or joint ventures in relation to your business.
: Our company is not the manufacture; we do not know the details of government's approval process on adding capacity.
2. Does the government have the right to request modifications in the terms of adding capacity and/or joint ventures? If yes, provide a detailed explanation.
: Our company is not the manufacture; we do not know the details of government's rights in the terms of modifications to the adding capacity or joint ventures.

H-14 Raw materials

1. Are any of the suppliers related or affiliated with you? If yes, provide details.
: Our company is not the manufacture.
2. Do you purchase from State Invested Enterprises? If yes, provide a detail.
: Our company is not the manufacture.
3. If your supplier is based outside China, what import duty rate is applied on the raw materials?
: Our company is not the manufacture.
4. Is there a price difference in purchase price for raw materials between your suppliers? If yes, provide a detailed explanation.
: Our company is not the manufacture.
5. Describe in detail your business' purchase procedures of the raw materials, the considerations in selecting a supplier and how the price of the raw materials is determined between you and your suppliers. If it is by tenders, provide details of the criterions/conditions.
: Our company is not the manufacture.
6. If any of your raw materials for the goods and/or like goods are imported by your business, or related businesses:
 - a. Provide details including a description of the raw material imported, the supplier and country of origin.
 - b. Explain the process required to import the raw materials (e.g. obtaining an import licence, import declarations).
 - c. Provide details of any conditions to importing the raw materials (e.g. customs and/or quarantine).
 - d. Are you eligible for a duty drawback? If yes, provide details.: Our company is not the manufacture.
7. Do you, or a business associated with you, sell any of the raw materials used to manufacture the goods and/or like goods, or sell the semi-processed goods?
 - a. Please provide a description of the raw material or semi-processed goods which are sold, including whether they are domestic or export transactions, to related or unrelated parties, and how the selling price is determined.
 - b. If there is a difference in selling prices between related and unrelated parties, please provide reasons as to why.: No, our company is not the manufacture.

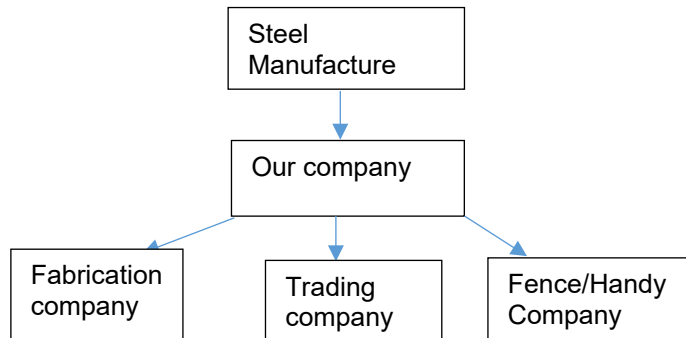
SECTION I CHINESE MARKET

I-1 Prevailing conditions of competition in the Chinese market

1. Describe the Chinese market for the goods and the prevailing conditions of competition within the market, including:
 - (a) Provide an overall description of the market in China which explains its main characteristics and trends over the past five years;
: The competition in the local market is very serious, as there are so many manufactures and trading company compete with each other, and also the customers are sensitive to the price.
 - (b) Provide the sources of demand for the goods in China, including the categories of customers, users or consumers of the product;
: Our customers for the precision tube are mainly from fabrication company, small trading company, and other metal processing company.
 - (c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b);
: Each of the source above probably take one of third of our local sale.
 - (d) Describe the factors that influence consumption/demand variability in China, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;
: The main factor can influence our local sale is the season, we have much lower sales revenue in the winter season comparing with spring and summer season.
 - (e) Describe any market segmentations in China; such as geographic or product segmentations;
: Segmentations we focus on local market include fabrication company who buy the precision tube and use it as part of the fabrication jobs, and also fence/handy company who use the precision tube straight way with no extra processing work, and also we have some customers are other trading company buying from us.
 - (f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e);
: one of third from each segmentation.
 - (g) Describe the way in which Chinese and imported goods compete in the Chinese market;
: we do not import the goods to China, so we do not know the ways of imported goods competing with Chinese products in the local market.
 - (h) Describe the ways that the goods are marketed and distributed in the Chinese market;
and
: Our company use website and Alibaba to promote our products, and we also call our customers to sell our customer. We buy the products and stock in our warehouse, and sell the product to other fabrication company and end-user, we also sell the tube to other trading company.
 - (i) Describe any other factors that are relevant to characteristics or influences on the Chinese market for the goods.
: In addition to season, we do not realise other important factors influencing the Chinese market for the goods.

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

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



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

There are so many steel manufactures and trading companies in China producing and trading the goods or like-goods, and there is no monopoly company in local market big enough to significantly influence the market. And as a trading company we do not familiar with the equipments, corporate stationer, and also, we do not know the market share and market participants of other manufactures and trading companies.

4. Identify the names of commercially significant importers in the Chinese market for the goods over the investigation period and estimate their market share. Specify the country each importer imports from and their level of trade in the Chinese market, if known.
: We have no knowledge of this kind of information.
5. Describe the regulatory framework of the Chinese market for the goods as it relates to competition policy, taxation, product standards and the range of the goods. Provide a copy of any regulation described, if available.
: We have no knowledge about the regulatory framework for the Chinese market for the goods.
6. Describe any entry restrictions for new participants into the Chinese market for the goods. Your response could include information on:
 - resource ownership;
 - patents and copyrights;
 - licenses;
 - barriers to entry;
 - import restrictions; and
 - government regulations (including the effect of those government regulations).

: We have no knowledge about any entry restrictions.

I-2 Goods in the Chinese market

1. Generally describe the range of goods offered for sale in the Chinese market. The description should include all like goods, including those produced by your company. Your description could include information about:
 - quality differences;
 - price differences;
 - supply/availability differences;
 - technical support differences;
 - the prevalence of private labels/customer brands;
 - the prevalence of generic or plain labels;

- the prevalence of premium labels; and
- product segmentation.

: For the products selling in Chinese market, there are grades: Q195(similar with C200), Q235(similar with C250), and Q345(similar with C350), the higher grade, the selling price will be higher as well.

2. Describe the end uses of the goods in the Chinese market from all sources.
For fabrication company they may need the tubes in higher grade, and for fence and handy companies, they use the lower grad tube more common.
3. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the Chinese market. Rank these preferences or purchasing influencers in order of importance.
:Price,quality,and stock level(if we can supply the goods on time)
Price>stock level>quality
As the precision tube is not for structural purpose, so customers do not concern the quality issue much.
4. Identify if there are any commercially significant market substitutes in the Chinese market for the goods.
: We have no knowledge about the market substitutes in the Chinese market for the goods.
5. Identify if there are any commercially significant market complements in the Chinese market for the goods.
: The Chinese market for the goods is highly competitive market.
6. Have there been any changes in market or consumer preferences in the Chinese market for the goods in the last five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.
: We did not realise any changes in the market or consumer preferences in the Chinese market for the goods in the last five years.

I-3 Relationship between price and cost

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

: The Chinese market accounts of [REDACTED] of our sales revenue in 2019(Confidential)
: The Chinese market accounts of [REDACTED] of our profits in 2019(Confidential)

In responding to question 1 please provide evidence supporting calculations.

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

: No, our company is not the price leaders for the goods in the Chinese market, as the market is highly competitive market, and there so many manufactures and trading companies in the market, it is impossible to be a price leader in such market.
3. Describe the nature of your product pricing (e.g., market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g., competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in China. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.
: As a trading company, we do not have product cost information, however our selling price is based on the market price which should be the competition-based pricing. We do not have the different price strategies for different products, we mainly just follow the market price.

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4. Explain the process for how the selling prices of the goods for the Chinese market by your business are determined. Provide copies of internal documents which support how pricing is determined.
: Normally we use the public website such My Steel as the price reference for the market price movement, and also, we will call other steel supplier to track the daily price movements.
5. How frequently are your Chinese selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.
: The price movement and reviewed in Chinese market is daily based.
6. Rank the following factors in terms of their influence on your pricing decisions in the Chinese market, with the most important factor ranked first and the least important factor ranked last:
- Competitors' prices
 - Cost to make and sell the goods
 - Volume of the order
 - Value of the order
 - Volume of forward orders
 - Value of forward orders
 - Customer relationship management
 - Supplier relationship management
 - Desired profit
 - Level of inventory
 - Brand attributes
 - Purchase price of raw materials (As we are not manufacture, this is not important to us at all)
7. Describe the relationship between selling price and costs to make and sell in the Chinese market. Does your company maintain a desired profit margin for the goods?
: As a trading company, our selling price is driven by the market price.
8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Chinese market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.
: No, we do not offer price reductions.
9. Do you offer bundled pricing in the Chinese market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for the goods. Provide copies of internal documents which support your claims in response to this question.
: No, we do not offer bundled pricing in the Chinese market.
10. Does the volume of sales to a customer or the size of an order influence your selling price in China? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume-based prices for the goods. Provide copies of internal documents which support your claims in response to this question.
: We normally will sale our product cheaper for the high volume of order, however we do not have special model in establishing volume-based prices for the goods.
11. Does your organisation/business entity use sales contracts in the Chinese market? If yes:
- (a) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
: 100%
 - (b) Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
: No exclusivity contracts offered.
 - (c) How frequently are sales contracts renegotiated?

: Since our price is based on market price, so every new contract will be reviewed based on market price.

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

: Our price review is daily based.

(e) Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review.

: No

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

: No

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

: [REDACTED] (Confidential).

: [REDACTED] (Confidential)

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

: Our selling price is based on the daily market price of local market, so we do not keep previous year's daily price list.(Confidential)

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

: We do not use price models as our selling price is driven by market price.

14. Do you tier or segment your Chinese customers for the goods in terms of pricing? If yes, provide:

(a) a general description of how this is done;

(b) list the factors that influence pricing differentiation in different tiers or segments; and

(c) explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

: No, we do not use different price strategies for different customer segments.

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

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

: No, there is no goods sold to related entities in China.

I-4 Marketing and sales support in the Chinese market

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

: Our company does not have marketing strategy for the goods

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

: No, our company does not conductbring segmentation in the Chinese market.

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

: We do not use advertising in Chinese market.

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4. How many people are in your Chinese market sales team and where are they located? In general terms, how are they remunerated? If they are offered performance pay based on sales, describe the performance indicators used to establish the performance pay. Provide copies of internal documents which support your claims in response to this question.
: Our team have 4 people, they are all based in our head office, they are not offered performance payment based on sales.
5. Describe what parameters are provided to sales staff to assist in establishing pricing for the goods when negotiating sales with customers. Provide copies of internal documents which support your claims in response to this question.
: Our price is based on market price, so there are no parameters here to assist in setting up price.

SECTION J PRODUCTION AND PRODUCTION COSTS

J-1 Production of the goods

1. Describe how your company determines its volume of production for the goods, product mix of production and the factors that contribute to these decisions. How frequently are production volumes determined for the goods? How frequently is the product mix determined for the goods? Provide copies of internal documents which support your claims in response to this question.
: Our company does not manufacture.
2. What lead times are typically needed to adjust volumes of production for the goods? Provide copies of internal documents which support your claims in response to this question.
: Our company does not manufacture.
3. Do you have warehousing facilities for the goods? If no, what do you do with excess inventory? If yes:
: Our company does not manufacture.
 - (a) What is the volume capacity of these facilities?
 - (b) What was the monthly amount of inventory maintained during the investigation period?
 - (c) What is the average period of time that inventory is retained (describe how this is calculated)?

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

4. Have there been any changes to the type of capital or technology utilised by your company in the manufacturing of the goods in the last five years? If yes, provide details.
: Our company does not manufacture.
5. For each plant capable of producing inputs that could be utilised to make the goods, provide the date that production facility came into operation and the production capacity of the plant over the past five years. The production capacity should be based on an actual production capacity, not a budgeted production capacity. Provide copies of internal documents which support your claims in response to this question.
: Our company does not manufacture.
6. List any significant investments in the past five years to either upgrade, refurbish or build any of the plants used in the production of the goods.
: Our company does not manufacture.

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

7. Confirm whether management reports are prepared on production costs. If yes:
 - (a) specify how often these cost reports are prepared;
 - (b) describe the level of detail in those reports and whether they enable the establishment of costs of producing the goods; and
 - (c) specify to whom within the company these reports are provided; and
 - (d) provide copies of these reports for each month of the investigation period.
: Our company does not manufacture.

SECTION K AUSTRALIAN MARKET

K-1 Prevailing conditions of competition in the Australian market

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

: We are not quite understanding Australian Market, our sales to our Australian Market is based on Our floor stock and local market price, we do not have specific marketing strategy for Australian Market.

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

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

: We only deal one customer so far, and we have no knowledge how our customer deal with its customer.
3. Describe the commercially significant market participants in the Australian market for the goods at each level of trade over the investigation period. Include in your description:
 - names of the participants;
 - the level of trade for each market participant (e.g., manufacturer, reseller, original equipment manufacturer (EOM), retailer, corporate stationer, importer, etc.);
 - a description of the degree of integration (either vertical or horizontal) for each market participant; and
 - an estimation of the market share of each participant.

: In the whole investigation, there are mainly three participants: Our company, we mainly stock the The steels and sell it to customers, [REDACTED] steel pipe, the Manufacture of the steel tube, [REDACTED], our customer in Australia (confidential). Normally we buy the steels from different manufactures, and [REDACTED] steel pipe is the main manufacture for us for the precision tube.(confidential).

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

: Our Australian importer is [REDACTED](confidential). We do not know other imports in Australian market.

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

: We do not know the regulatory framework of the Australian market for the goods.

6. Describe any entry restrictions for new participants into the Australian market for the goods. Your response could include information on:

- resource ownership;
- patents and copyrights;
- licenses;
- barriers to entry;
- import restrictions; and
- government regulations (including the effect of those government regulations).

: We do not know the relevant restrictions for entering into Australian market for the goods.

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

K-2 Goods in the Australian market

1. Generally, describe the range of the goods offered for sale in the Australian market. The description should include all goods under consideration including those produced by your company. Your description could include information about:

- quality differences;
- price differences;
- supply/availability differences;
- technical support differences;
- the prevalence of private labels/customer brands;
- the prevalence of generic or plain labels;
- the prevalence of premium labels; and
- product segmentation.

: Our selling goods are low grade, non-structure purpose tube. The tube should be normally used Fence, handy jobs and other non-structure purpose works. The price should be cheaper than the higher grade tube.

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

: The precision tube should be used for fence, and other non-structure works.

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

: Price

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

: We did not realise the market substitutes.

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

: We have no knowledge about market complements in Australian market.

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

: We do not realise any changes in Australian market for the goods in the last five years.

K-3 Relationship between price and cost in Australia

1. Describe the importance of the Australian market to your company's operations. In your response describe:

(a) The proportion of your company's sales revenue derived from sales of the goods in Australia; and

: Australian market accounts of [REDACTED] (Confidential)

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

: [REDACTED] (Confidential)

In responding to question 1 please provide evidence supporting calculations.

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

:No, we are not the price leader for the goods. The precision tube is not a main product for our sales in Australian market, we did not pay much attention, so we have no knowledge about the price or market leader of precision tube in Australian market.

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

:Our selling price is only based on our local market price in Chinese market.

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

:Our selling price is only based on our local market price in Chinese market.

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

:Our selling price is based on our local market price in Chinese market, the price will be reviewed daily based on the local price and our stock level.

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

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

:Level of inventory>Value of the order>Volume of the order>Value of forward orders>Volume of Forward orders>Customer relationship management>Desired profit>Competitors' prices>supplier relationship management>brand attributes>cost to make and sell the goods>Purchase price of raw materials(we do no manufacture the goods, so we are not involved of purchase of raw materials)

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

:Yes, for exporting to Australian market, we maintain a desired profit margin for the goods.

8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Australian market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.
:No
9. Do you offer bundled pricing in the Australian market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for the goods. Provide copies of internal documents which support your claims in response to this question.
:No
10. Does the volume of sales to a customer or the size of an order influence the selling price? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume-based prices for the goods. Provide copies of internal documents which support your claims in response to this question.
:No, our selling price is based on local market price.
11. Does your organisation/business entity use sales contracts in the Australian market? If yes:
- (a) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
:100%of contract sale
 - (b) Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
:No, we do not offer exclusive contracts.
 - (c) How frequently are sales contracts renegotiated?
:we will negotiate every new contract.
 - (d) How frequently are price reviews conducted between contracts?
:we will review price for every new contract.
 - (e) Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review.
:Our price is based market price, so we will offer new price for every new inquiry from our customer.
 - (f) Do changes in your costs to make and sell enable you to review prices for customers within contracts?
:We do not manufacture the goods; our price review is only based on the market price.
 - (g) Provide a list of the customers under contract during the investigation period and copies of the two largest contracts in terms of sales revenue.
: [REDACTED] (Confidential)
12. Provide copies of any price lists for the goods used in the Australian market during the investigation period. If you do not use price lists, describe the transparency of your prices in the Australian market.
:We do not have price lists for the goods sold to Australian market.
13. How do you differentiate pricing for different products/models of the goods in the Australian market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost to make or selling cost differences between differentiated products. Describe how these cost differences (if any) influence pricing decisions. Provide copies of internal documents which support your claims in response to this question.
:We only sell low grade precision tube, and price is based on the market price, there is no different price model.
14. Do you tier or segment your Australian customers for the goods in terms of pricing? If yes, provide:
- (a) a general description of how this is done;
 - (b) list the factors that influence pricing differentiation in different tiers or segments; and
 - (c) explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.
- :No, we do not segment Australian customers.

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

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

: [REDACTED] the selling price is based on the Chinese market price for the goods plus the design margin to cover the potential financial risks and other potential cost. (Confidential)

K-4 Marketing and sales support in the Australian market

1. How does your company market the goods in the Australian market? Include in your response the value proposition used (e.g., competitive price, superior quality, reliability, availability, etc.).
:Our company does not market the goods specifically; our price is based on market price of Chinese Market. Our sales are most based on our floor stock.
2. Does your company conduct brand segmentation in the Australian market for the goods? If yes, describe the brand segmentation used and provide the proportion of sales revenue derived from each brand segment.
:No, our company does not conduct brand segmentation.
3. Provide examples of your Australian advertising of the goods over the past five years. If you have not used advertising in Australia, provide examples of any other promotion campaigns you have conducted over the investigation period.
:No, we do not use promotion campaigns in Australian market.
4. How many people are in your Australian sales team and where are they located? In general terms, how are they remunerated? If they are offered performance pay based on sales, describe the performance indicators used to establish the performance pay. Provide copies of internal documents which support your claims in response to this question.
:We do not Australian sales team specifically for Australian market.
5. Describe what parameters are provided to sales staff to assist in establishing pricing for the goods when negotiating sales with customers. Provide copies of internal documents which support your claims in response to this question.
:No specific parameters used for pricing the goods.

SECTION L COUNTERVAILING

The following programs are being investigated:

Category	Program number	Program name
Less than adequate remuneration (LTAR)	20	Hot rolled steel provided by government at less than fair market value
Grant	2	One-time Awards to Enterprises Whose Products Qualify for 'Well-Known Trademarks of China' and 'Famous Brands of China'
	5	Matching Funds for International Market Development for Small and Medium Enterprises
	6	Superstar Enterprise Grant
	7	Research & Development (R&D) Assistance Grant
	8	Patent Award of Guangdong Province
	15	Innovative Experimental Enterprise Grant
	16	Special Support Fund for Non State-Owned Enterprises
	17	Venture Investment Fund of Hi-Tech Industry
	18	Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment
	19	Grant for key enterprises in equipment manufacturing industry of Zhongshan
	21	Water Conservancy Fund Deduction
	22	Wuxing District Freight Assistance
	23	Huzhou City Public Listing Grant
	27	Huzhou City Quality Award
	28	Huzhou Industry Enterprise Transformation & Upgrade Development Fund
	30	Wuxing District Public Listing Grant
	31	Anti-dumping Respondent Assistance
	32	Technology Project Assistance
	34	Balidian Town Public Listing Award
	40	Dining lampblack governance subsidy of Jinghai County Environmental Protection Bureau
	41	Discount interest fund for technological innovation
	42	Energy conservation and emission reduction special fund project in 2015
	43	Enterprise famous brand reward of Fengnan Finance Bureau
	44	Government subsidy for construction
	45	Infrastructure Construction Costs Of Road In Front Of No.5 Factory
	46	New Type Entrepreneur Cultivation Engineering Training Fee Of Jinghai County Science And Technology Commission
	47	Subsidy for Coal-Fired Boiler of Fengnan Subtreasury

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Category	Program number	Program name
	48	Subsidy for Coal-Fired Boiler Rectification
	49	Subsidy for District Level Technological Project
	50	Subsidy For Pollution Control Of Fengnan Environmental Protection Bureau
	51	Subsidy from Science and Technology Bureau of Jinghai County
	52	Subsidy of Environment Bureau transferred from Shiyou
Tax	1	Preferential Tax Policies for Enterprises with Foreign Investment Established in the Coastal Economic Open Areas and Economic and Technological Development Zones
	10	Preferential Tax Policies for Foreign Invested Enterprises– Reduced Tax Rate for Productive Foreign Invested Enterprises scheduled to operate for a period of not less than 10 years
	11	Preferential Tax Policies for Enterprises with Foreign Investment Established in Special Economic Zones (excluding Shanghai Pudong area)
	12	Preferential Tax Policies for Enterprises with Foreign Investment Established in Pudong area of Shanghai
	13	Preferential Tax Policies in the Western Regions
	14	Tariff and VAT Exemptions on Imported Materials and Equipment
	29	Land Use Tax Deduction
	35	Preferential Tax Policies for High and New Technology Enterprises
	36	Local Tax Bureau Refund
	37	Return of Farmland Use Tax
	38	Return of Land Transfer Fee
39	Return of Land Transfer Fee From Shiyou	

L-1 General

1. Complete the worksheet named “L-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.

L-2 Provision of goods at less than adequate remuneration

1. Describe the nature of your production process for the goods, including an itemised list of all raw materials (including electricity and gas, if applicable) used by your company in the process.
:Our company is not the manufacture, for some times, we will process the precision tube to cut the goods into different sizes, and send to powder coating the steel before delivering to customers.
2. Did your business or any company/entity related to your business receive any benefit under the above programs during the period? If yes, provide details, including:
 - (a) the name of any Government of China opinions, directives, decrees, promulgations, measures, or any other official documentation governing the program;

- (b) copy of any application form or relevant official governing documentation (including opinions, directives, decrees, promulgations, measures, etc.) and a translation in English;³
- (c) documentation concerning the Government of China or any association of the Government of China's notification of the measures concerning the goods to your company during the period.

:No, our company is not involved of any above programs,

3. Did your business receive any reduction/reduced price for the purchase of these goods/services during the investigation period? If so, describe the eligibility criteria that your business had to meet in order to qualify for any reduction in the price paid for the goods/services.

:No

4. Provide copies of all contractual agreements that detail the obligations of the State Invested Enterprise (SIE) and your business with reference to the granting and receipt of the assistance/benefits.

:We are not involved of any of these contractual agreements.

5. If your business purchased imported raw materials, explain the reason/s for your business' decision to purchase imported over domestic raw materials, including the key factors affecting the decision such as price, availability etc.

:We are not involved of purchasing imported materials.

L-3 Preferential tax programs

1. Complete the worksheet named "L-3 Income Tax"

- This worksheet is a table of your company's income tax liability over the last three financial years.
- You must provide this table in electronic format using the template provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.

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

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

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

:10%.

5. Did your company pay less than the general tax rate for enterprises referred to in question I-3.4? No, our company does not receive any tax benefits from above programs.

If yes:

- (a) What tax rate did your company pay?

³ A link to an active website setting out the relevant official governing documentation is also acceptable.

WAS THE REDUCTION IN THE TAX PAID OR PAYABLE RELATED TO ANY OF THE PREFERENTIAL INCOME TAX PROGRAMS IN THE TABLE AT THE TOP OF SECTION I CHINESE MARKET

I-1 Prevailing conditions of competition in the Chinese market

2. Describe the Chinese market for the goods and the prevailing conditions of competition within the market, including:
- (j) Provide an overall description of the market in China which explains its main characteristics and trends over the past five years;
: The competition in the local market is very serious, as there are so many manufactures and trading company compete with each other, and also the customers are sensitive to the price.
 - (k) Provide the sources of demand for the goods in China, including the categories of customers, users or consumers of the product;
: Our customers for the precision tube are mainly from fabrication company, small trading company, and other metal processing company.
 - (l) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b);
: Each of the source above probably take one of third of our local sale.
 - (m) Describe the factors that influence consumption/demand variability in China, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;
: The main factor can influence our local sale is the season, we have much lower sales revenue in the winter season comparing with spring and summer season.
 - (n) Describe any market segmentations in China; such as geographic or product segmentations;
: Segmentations we focus on local market include fabrication company who buy the precision tube and use it as part of the fabrication jobs, and also fence/handy company who use the precision tube straight way with no extra processing work, and also we have some customers are other trading company buying from us.
 - (o) Provide an estimated proportion of sales revenue from each of the market segments listed in (e);
: one of third from each segmentation.
 - (p) Describe the way in which Chinese and imported goods compete in the Chinese market;
: we do not import the goods to China, so we do not know the ways of imported goods competing with Chinese products in the local market.
 - (q) Describe the ways that the goods are marketed and distributed in the Chinese market; and
: Our company use website and Alibaba to promote our products, and we also call our customers to sell our customer. We buy the products and stock in our warehouse, and sell the product to other fabrication company and end-user, we also sell the tube to other trading company.
 - (r) Describe any other factors that are relevant to characteristics or influences on the Chinese market for the goods.
: In addition to season, we do not realise other important factors influencing the Chinese market for the goods.

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

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

8. Describe the commercially significant market participants in the Chinese market for the goods at each level of trade over the investigation period. Include in your description:

- names of the participants;
- the level of trade for each market participant (e.g., manufacturer, reseller, original equipment manufacturer (EOM), retailer, corporate stationer, importer, etc.);
- a description of the degree of integration (either vertical or horizontal) for each market participant; and
- an estimation of the market share of each participant.

There are so many steel manufactures and trading companies in China producing and trading the goods or like-goods, and there is no monopoly company in local market big enough to significantly influence the market. And as a trading company we do not familiar with the equipments, corporate stationer, and also, we do not know the market share and market participants of other manufactures and trading companies.

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

: We have no knowledge of this kind of information.

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

: We have no knowledge about the regulatory framework for the Chinese market for the goods.

11. Describe any entry restrictions for new participants into the Chinese market for the goods. Your response could include information on:

- resource ownership;
- patents and copyrights;
- licenses;
- barriers to entry;
- import restrictions; and
- government regulations (including the effect of those government regulations).

: We have no knowledge about any entry restrictions.

I-2 Goods in the Chinese market

7. Generally describe the range of goods offered for sale in the Chinese market. The description should include all like goods, including those produced by your company. Your description could include information about:

- quality differences;
- price differences;
- supply/availability differences;
- technical support differences;
- the prevalence of private labels/customer brands;
- the prevalence of generic or plain labels;

- the prevalence of premium labels; and
- product segmentation.

: For the products selling in Chinese market, there are grades: Q195(similar with C200), Q235(similar with C250), and Q345(similar with C350), the higher grade, the selling price will be higher as well.

8. Describe the end uses of the goods in the Chinese market from all sources.
For fabrication company they may need the tubes in higher grade, and for fence and handy companies, they use the lower grad tube more common.
9. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the Chinese market. Rank these preferences or purchasing influencers in order of importance.
:Price,quality,and stock level(if we can supply the goods on time)
Price>stock level>quality
As the precision tube is not for structural purpose, so customers do not concern the quality issue much.
10. Identify if there are any commercially significant market substitutes in the Chinese market for the goods.
: We have no knowledge about the market substitutes in the Chinese market for the goods.
11. Identify if there are any commercially significant market complements in the Chinese market for the goods.
: The Chinese market for the goods is highly competitive market.
12. Have there been any changes in market or consumer preferences in the Chinese market for the goods in the last five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.
: We did not realise any changes in the market or consumer preferences in the Chinese market for the goods in the last five years.

I-3 Relationship between price and cost

16. Describe the importance of the Chinese market to your company's operations. In your response describe:

(c) The proportion of your company's sales revenue derived from sales of the goods in China; and

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

: The Chinese market accounts of [REDACTED] of our sales revenue in 2019(Confidential)

: The Chinese market accounts of [REDACTED] of our profits in 2019(Confidential)

In responding to question 1 please provide evidence supporting calculations.

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

: No, our company is not the price leaders for the goods in the Chinese market, as the market is highly competitive market, and there so many manufactures and trading companies in the market, it is impossible to be a price leader in such market.
18. Describe the nature of your product pricing (e.g., market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g., competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in China. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.
: As a trading company, we do not have product cost information, however our selling price is based on the market price which should be the competition-based pricing. We do not have the different price strategies for different products, we mainly just follow the market price.

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19. Explain the process for how the selling prices of the goods for the Chinese market by your business are determined. Provide copies of internal documents which support how pricing is determined.
: Normally we use the public website such My Steel as the price reference for the market price movement, and also, we will call other steel supplier to track the daily price movements.
20. How frequently are your Chinese selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.
: The price movement and reviewed in Chinese market is daily based.
21. Rank the following factors in terms of their influence on your pricing decisions in the Chinese market, with the most important factor ranked first and the least important factor ranked last:
- Competitors' prices
 - Cost to make and sell the goods
 - Volume of the order
 - Value of the order
 - Volume of forward orders
 - Value of forward orders
 - Customer relationship management
 - Supplier relationship management
 - Desired profit
 - Level of inventory
 - Brand attributes
 - Purchase price of raw materials (As we are not manufacture, this is not important to us at all)
22. Describe the relationship between selling price and costs to make and sell in the Chinese market. Does your company maintain a desired profit margin for the goods?
: As a trading company, our selling price is driven by the market price.
23. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Chinese market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.
: No, we do not offer price reductions.
24. Do you offer bundled pricing in the Chinese market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for the goods. Provide copies of internal documents which support your claims in response to this question.
: No, we do not offer bundled pricing in the Chinese market.
25. Does the volume of sales to a customer or the size of an order influence your selling price in China? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume-based prices for the goods. Provide copies of internal documents which support your claims in response to this question.
: We normally will sale our product cheaper for the high volume of order, however we do not have special model in establishing volume-based prices for the goods.
26. Does your organisation/business entity use sales contracts in the Chinese market? If yes:
- (h) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
: 100%
 - (i) Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
: No exclusivity contracts offered.
 - (j) How frequently are sales contracts renegotiated?

: Since our price is based on market price, so every new contract will be reviewed based on market price.

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

: Our price review is daily based.

- (l) Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review.

: No

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

: No

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

: [REDACTED] (Confidential).

: [REDACTED] (Confidential)

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

: Our selling price is based on the daily market price of local market, so we do not keep previous year's daily price list.(Confidential)

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

: We do not use price models as our selling price is driven by market price.

29. Do you tier or segment your Chinese customers for the goods in terms of pricing? If yes, provide:

(d) a general description of how this is done;

(e) list the factors that influence pricing differentiation in different tiers or segments; and

(f) explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

: No, we do not use different price strategies for different customer segments.

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

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

: No, there is no goods sold to related entities in China.

I-4 Marketing and sales support in the Chinese market

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

: Our company does not have marketing strategy for the goods

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

: No, our company does not conductbring segmentation in the Chinese market.

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

: We do not use advertising in Chinese market.

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9. How many people are in your Chinese market sales team and where are they located? In general terms, how are they remunerated? If they are offered performance pay based on sales, describe the performance indicators used to establish the performance pay. Provide copies of internal documents which support your claims in response to this question.
: Our team have 4 people, they are all based in our head office, they are not offered performance payment based on sales.
10. Describe what parameters are provided to sales staff to assist in establishing pricing for the goods when negotiating sales with customers. Provide copies of internal documents which support your claims in response to this question.
: Our price is based on market price, so there are no parameters here to assist in setting up price.

SECTION J PRODUCTION AND PRODUCTION COSTS

J-1 Production of the goods

8. Describe how your company determines its volume of production for the goods, product mix of production and the factors that contribute to these decisions. How frequently are production volumes determined for the goods? How frequently is the product mix determined for the goods? Provide copies of internal documents which support your claims in response to this question.
: Our company does not manufacture.
9. What lead times are typically needed to adjust volumes of production for the goods? Provide copies of internal documents which support your claims in response to this question.
: Our company does not manufacture.
10. Do you have warehousing facilities for the goods? If no, what do you do with excess inventory? If yes:
: Our company does not manufacture.
- (d) What is the volume capacity of these facilities?
(e) What was the monthly amount of inventory maintained during the investigation period?
(f) What is the average period of time that inventory is retained (describe how this is calculated)?

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

11. Have there been any changes to the type of capital or technology utilised by your company in the manufacturing of the goods in the last five years? If yes, provide details.
: Our company does not manufacture.
12. For each plant capable of producing inputs that could be utilised to make the goods, provide the date that production facility came into operation and the production capacity of the plant over the past five years. The production capacity should be based on an actual production capacity, not a budgeted production capacity. Provide copies of internal documents which support your claims in response to this question.
: Our company does not manufacture.
13. List any significant investments in the past five years to either upgrade, refurbish or build any of the plants used in the production of the goods.
: Our company does not manufacture.

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

14. Confirm whether management reports are prepared on production costs. If yes:
(e) specify how often these cost reports are prepared;
(f) describe the level of detail in those reports and whether they enable the establishment of costs of producing the goods; and
(g) specify to whom within the company these reports are provided; and
(h) provide copies of these reports for each month of the investigation period.
: Our company does not manufacture.

SECTION K AUSTRALIAN MARKET

K-1 Prevailing conditions of competition in the Australian market

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

: We are not quite understanding Australian Market, our sales to our Australian Market is based on Our floor stock and local market price, we do not have specific marketing strategy for Australian Market.

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

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

: We only deal one customer so far, and we have no knowledge how our customer deal with its customer.

9. Describe the commercially significant market participants in the Australian market for the goods at each level of trade over the investigation period. Include in your description:

- names of the participants;
- the level of trade for each market participant (e.g., manufacturer, reseller, original equipment manufacturer (EOM), retailer, corporate stationer, importer, etc.);
- a description of the degree of integration (either vertical or horizontal) for each market participant; and
- an estimation of the market share of each participant.

: In the whole investigation, there are mainly three participants: Our company, we mainly stock the The steels and sell it to customers, [REDACTED] steel pipe, the Manufacture of the steel tube, [REDACTED], our customer in Australia (confidential).

Normally we buy the steels from different manufactures, and [REDACTED] steel pipe is the main manufacture for us for the precision tube.(confidential).

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

: Our Australian importer is [REDACTED](confidential). We do not know other imports in Australian market.

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

: We do not know the regulatory framework of the Australian market for the goods.

12. Describe any entry restrictions for new participants into the Australian market for the goods. Your response could include information on:

- resource ownership;
- patents and copyrights;
- licenses;
- barriers to entry;
- import restrictions; and
- government regulations (including the effect of those government regulations).

: We do not know the relevant restrictions for entering into Australian market for the goods.

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

K-2 Goods in the Australian market

7. Generally, describe the range of the goods offered for sale in the Australian market. The description should include all goods under consideration including those produced by your company. Your description could include information about:

- quality differences;
- price differences;
- supply/availability differences;
- technical support differences;
- the prevalence of private labels/customer brands;
- the prevalence of generic or plain labels;
- the prevalence of premium labels; and
- product segmentation.

: Our selling goods are low grade, non-structure purpose tube. The tube should be normally used Fence, handy jobs and other non-structure purpose works. The price should be cheaper than the higher grade tube.

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

: The precision tube should be used for fence, and other non-structure works.

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

: Price

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

: We did not realise the market substitutes.

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

: We have no knowledge about market complements in Australian market.

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

: We do not realise any changes in Australian market for the goods in the last five years.

K-3 Relationship between price and cost in Australia

16. Describe the importance of the Australian market to your company's operations. In your response describe:

(c) The proportion of your company's sales revenue derived from sales of the goods in Australia; and

: Australian market accounts of [REDACTED] (Confidential)

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

: [REDACTED] (Confidential)

In responding to question 1 please provide evidence supporting calculations.

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

:No, we are not the price leader for the goods. The precision tube is not a main product for our sales in Australian market, we did not pay much attention, so we have no knowledge about the price or market leader of precision tube in Australian market.

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

:Our selling price is only based on our local market price in Chinese market.

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

:Our selling price is only based on our local market price in Chinese market.

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

:Our selling price is based on our local market price in Chinese market, the price will be reviewed daily based on the local price and our stock level.

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

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

:Level of inventory>Value of the order>Volume of the order>Value of forward orders>Volume of Forward orders>Customer relationship management>Desired profit>Competitors' prices>supplier relationship management>brand attributes>cost to make and sell the goods>Purchase price of raw materials(we do no manufacture the goods, so we are not involved of purchase of raw materials)

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

:Yes, for exporting to Australian market, we maintain a desired profit margin for the goods.

23. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Australian market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.
:No
24. Do you offer bundled pricing in the Australian market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for the goods. Provide copies of internal documents which support your claims in response to this question.
:No
25. Does the volume of sales to a customer or the size of an order influence the selling price? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume-based prices for the goods. Provide copies of internal documents which support your claims in response to this question.
:No, our selling price is based on local market price.
26. Does your organisation/business entity use sales contracts in the Australian market? If yes:
- (h) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
:100%of contract sale
 - (i) Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
:No, we do not offer exclusive contracts.
 - (j) How frequently are sales contracts renegotiated?
:we will negotiate every new contract.
 - (k) How frequently are price reviews conducted between contracts?
:we will review price for every new contract.
 - (l) Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review.
:Our price is based market price, so we will offer new price for every new inquiry from our customer.
 - (m) Do changes in your costs to make and sell enable you to review prices for customers within contracts?
:We do not manufacture the goods; our price review is only based on the market price.
 - (n) Provide a list of the customers under contract during the investigation period and copies of the two largest contracts in terms of sales revenue.
: [REDACTED] (Confidential)
27. Provide copies of any price lists for the goods used in the Australian market during the investigation period. If you do not use price lists, describe the transparency of your prices in the Australian market.
:We do not have price lists for the goods sold to Australian market.
28. How do you differentiate pricing for different products/models of the goods in the Australian market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost to make or selling cost differences between differentiated products. Describe how these cost differences (if any) influence pricing decisions. Provide copies of internal documents which support your claims in response to this question.
:We only sell low grade precision tube, and price is based on the market price, there is no different price model.
29. Do you tier or segment your Australian customers for the goods in terms of pricing? If yes, provide:
- (d) a general description of how this is done;
 - (e) list the factors that influence pricing differentiation in different tiers or segments; and
 - (f) explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.
- :No, we do not segment Australian customers.

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

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

: [REDACTED] the selling price is based on the Chinese market price for the goods plus the design margin to cover the potential financial risks and other potential cost. (Confidential)

K-4 Marketing and sales support in the Australian market

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

:Our company does not market the goods specifically; our price is based on market price of Chinese Market. Our sales are most based on our floor stock.

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

:No, our company does not conduct brand segmentation.

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

:No, we do not use promotion campaigns in Australian market.

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

:We do not Australian sales team specifically for Australian market.

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

:No specific parameters used for pricing the goods.

(b) Section L

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 are the eligibility criteria to benefit from the reduced tax rate?

(f) Provide details of the application process

(g) Provide a copy of the blank application form. If the documents are not in English, please provide a translation of the documents.

(h) Provide a copy of your company's completed application form, including all attachments to the application form. If the documents are not in English, please provide a translation of the documents.

(i) Provide a copy of any confirmation or other correspondence from the authority approving your company for the reduction in tax rate. If the documents are not in English, please provide a translation of the documents.

(j) Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.

L-4 Financial grants

1. Complete the worksheet named "L-4 Grants"

- This worksheet is a table of the grants received by company over the period plus the two preceding years.
- You must provide this table in electronic format using the template provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.

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:No financial grants for our company.

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.

:There is no non-operating income for our company.

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.

:There are no financial grants for our company.

4. For each of the grants listed in L-4.3:

- (a) What is the name of the grant?
- (b) What is the name of the authority providing the grant?
- (c) What is the eligibility criteria to receive the grant?
- (d) Is the grant directly related to the goods under consideration, export sales to Australia and/or export sales generally?
- (e) Provide details of the application process.
- (f) Provide a copy of the blank application form. If the documents are not in English, please provide a translation of the documents.
- (g) Provide a copy of your company's completed application form, including all attachments to the application form. If the documents are not in English, please provide a translation of the documents.
- (h) Provide a copy of any confirmation or other correspondence from the authority approving the grant. If the documents are not in English, please provide a translation of the documents.
- (i) Provide proof of payment of your company receiving the grant (e.g. bank statements).
- (j) Provide a copy of the accounting journal entries relating to the grant.
- (k) Outline the fees charged to, or expenses incurred by your business for purposes of receiving the grant.

:There are no financial grants for our company.

L-5 Tariff and VAT exemptions on imported materials and equipment

If your business or any company/entity related to your business received benefits under any program that provided an exemption from the payment of import duty and import VAT during the investigation period, please answer the following questions.

:No, our company is no manufacture for the goods, so not involved of using equipment and materials.

1. Please complete worksheet "L-5 VAT and tariff transactions".
2. Provide complete details involving the amount of the VAT refund received, including whether the refund was received in a lump sum or multiple instalments.
3. Describe the application and approval procedures for obtaining a benefit under the program.
4. 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 GOC in relation to the program.
5. Outline the fees charged to or expenses incurred by your business in receiving the program.
6. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.

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7. State whether your eligibility for the program was conditional on one or more of the following criteria:
 - (a) whether or not your business exports internationally, 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.
8. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
9. 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.
10. Indicate where benefits under this program can be found in your accounting system (i.e. specify the ledgers or journals) and financial statements.
11. Were the materials and/or equipment that were entitled to a refund of VAT used in the production of the goods during the investigation period? If yes, provide the following information:
 - (a) type of inputs;
 - (b) cost of inputs;
 - (c) quantity of inputs; and
 - (d) amount of VAT refunded.
12. Has your company received exemption from payment of or refunds of import duty and import VAT for imported material inputs (e.g. hot rolled coil, coking coal and coke) at any time that were used in the production of the goods during the investigation period? If yes, provide the following information:
 - (a) description of imported product;
 - (b) country of origin;
 - (c) quantity of imported product;
 - (d) purchase price;
 - (e) terms of purchase (e.g. FOB, CIF);
 - (f) ocean freight;
 - (g) value for duty of imported product;
 - (h) regular rate of taxes and duties;
 - (i) concessionary rate of taxes and duties;
 - (j) amount of duties and taxes normally applicable;
 - (k) amount of duties and taxes paid;
 - (l) amount of duties and taxes exempt;
 - (m) date of importation;
 - (n) tariff classification number;
 - (o) customs entry number; and
 - (p) application fee.

13. Explain if (and how) the GOC determines which imported inputs are consumed by your business in the production of the subject goods and in what amounts, and the amount of duty paid or payable on the inputs (including any allowance for waste).

14. Explain how the GOC determined the percentage rate of duty exemption.

Please note that goods consumed in the production of exported goods (inputs) include:

- (a) goods incorporated into the exported goods; and
- (b) energy, fuel, oil and catalysts that are used or consumed in the production of the exported goods.

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15. Provide a representative sample of copies of import entry documents (for example: bill of entry, invoice from supplier, etc.) for each type of importation covering duty-exempt inputs and duty-paid inputs imported for use in the manufacturing of the subject goods.
16. In addition to the import entry documents, you must also provide copies, if applicable, of any applications submitted to and/or approval document received from the GOC relating to the exemption from the payment of import duty and import VAT on imported inputs and in relation to the VAT that is refunded on the exportation of the subject goods.
17. Provide copies of reports and audits by the GOC authority responsible for administering the duty rebate or duty drawback scheme with respect to the verification of the importation and use of inputs and the remittance or drawback of the related duty paid or payable.
18. To your knowledge, does the program still operate or has it been terminated?

If the program has been terminated, please provide details (when, 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.

L-6 Preferential Loans/Financial Assistance

It is the Commission's understanding that certain enterprises in China benefit from low (subsidised) interest rates or credit facilities from state owned commercial banks and government banks.

1. Provide a general overview of how your company secures necessary financial resources on the financial market (e.g. Loans, issuance of bonds etc.)
:Our company do not have any financial liability from any commercial or government banks

Provide answers to the following questions in the worksheet"L-6 Preferential Loans".

2. Provide a list of all the loans provided to your company from banks and financial institutions which have not been fully reimbursed by the end of the investigation period.
:Our company do not have any financial liability from any commercial or government banks
3. Provide specific details of the loan, including the start date of the loan, the principal amount of the loan, terms and conditions of the loan, purpose of the loan, the repayment terms/frequency, repayment amount, interest rate, interest type (e.g. fixed, variable etc.), if the loan has been redrawn any time during its duration, please provide the redraw date, amount and the reason for redraw.
:Our company do not have any financial liability from any commercial or government banks
4. Indicate whether each bank is domestically or foreign-owned and give the percentage of government ownership of each bank (including ownership by entities owned or controlled by a government).
:Our company do not have any financial liability from any commercial or government banks
5. In the case of each loan from a government-owned or controlled bank, please explain the reason for borrowing from such a bank rather than a commercial bank. What are the differences in the terms and conditions of loans between the government and commercial banks?
:Our company do not have any financial liability from any commercial or government banks
6. Explain how the decisions to grant the loan or its conditions are dependent on the purpose of the loan and give details on the process your company went through to apply for the loan. Please provide detail on what conditions or criteria your company needed to fulfil to be granted the loan.
:Our company do not have any financial liability from any commercial or government banks

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7. For each of the loans listed, provide copies of signed loan agreements between the bank which provided the loan and company which was the addressee of the loan specifying the conditions of the loan such as amount, term of repayment, interest rate etc. Also provide a copy of your application for the loan.

*Note: If your company has more than one loan from same bank/financial Institution which were not repaid by the end of the investigation period and the loan agreements for these loans are standardised, it is sufficient **at this stage** to provide an English translation for one of them only (e.g. If your company has multiple loans from one particular bank which only differ in amounts you only need to translate one of them into English for your questionnaire response. However it is necessary to translate all credit line agreements from which loans not repaid by the end of the investigation period were drawn.*

:Our company do not have any financial liability from any commercial or government banks

8. Please explain whether the granting of the specific loan depended on the link between the purpose of the loan and the goals specified in any government plan or development program. Provide a copy of the laws, regulations, administrative guidelines and any other acts relevant for the operation of this lending with any subsequent amendments. Also include a copy of any governmental or development plan of which the scheme represents a direct implementation.

:Our company do not have any financial liability from any commercial or government banks

9. For each loan application, please explain the involvement of third parties such as government departments, local councils, party committees in the whole process since the application for the loan up to the decision whether the loan is granted or not.

:Our company do not have any financial liability from any commercial or government banks

10. In the "L-6 Preferential Loans" spreadsheet, provide the information requested on guarantees for the loans provided to your company.

:Our company do not have any financial liability from any commercial or government banks

11. Please give details of all loan applications during the investigation period which were refused. Provide the name of the bank, the amount of the loan requested and the reasons for refusal.

:Our company do not have any financial liability from any commercial or government banks

12. Provide any other information you may deem necessary for the Commission to make an assessment on the subsidisation of producers/exporters of the product under investigation. You may adjust the table in the "Loans" tab as necessary to include this additional information.

:No such information realised by our company.

L-7 Other Programs

1. Provide a list of all the provinces in which you have business operations (including locations of factories, sales offices, or other places of business).

: Shang Dong Province

2. Are you aware of any programs of the Government of China, any of its agencies or any other authorised body that benefits manufacturers of the goods that have not been accounted for in this questionnaire? Provide the name of those programs you are aware of (even if your company is not eligible to receive benefit under the program.)

:Not aware

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

:Not aware

4. Indicate the type of program, for example:

- the provision of grants, awards or prizes;
- the provision of goods or services at a reduced price (e.g. electricity, gas, transport);
- the reduction of tax payable including income tax and VAT;
- reduction in land use fees;
- loans at below-market rates; or
- any other form of assistance.

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:Not aware

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.
:No
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).
:No
7. Describe the application and approval procedures for obtaining a benefit under the program.
:No
8. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments, all contractual agreements entered into between your business and the Government of China and any other official governing documentation in relation to the program⁴ (including a translation in English).
:No
9. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.
:No
10. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
:No
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.:No program realised
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.
:No program realised
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.
:No program realised
14. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.
:No program realised
15. To your knowledge, does the program still operate or has it been terminated?
:No program realised
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 L-7 in relation to this programme.
:No program realised

⁴ A link to an active website setting out the relevant official governing documentation is also acceptable.

EXPORTER'S DECLARATION

I hereby declare that.....(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 :.....

Signature :.....

Position in

Company :.....

Date :.....

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)
CPT	the terms CFR and CIF are only used where goods are carried by sea or waterway transport
CIP	carriage paid to carriage and insurance paid to
DAF	the terms CPT and CIP are used as alternatives to CFR and CIF where the goods are carried by air, road, rail etc. 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

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	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.