



Importer Questionnaire

Case number: 595
Product: Wire Rope
From: The Republic of South Africa (South Africa)
Inquiry period: 1 January 2021 to 31 December 2021 (the period)

Section	Response due by
A	24 January 2022
B & C	23 February 2022
D & E	2 March 2022
F	A week prior to verification

Email response to: investigations1@adcommission.gov.au

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

TABLE OF CONTENTS

TABLE OF CONTENTS.....	2
INSTRUCTIONS.....	3
GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES	5
SECTION A COMPANY AND SUPPLIER INFORMATION	7
SECTION B IMPORTS & FORWARD ORDERS.....	10
SECTION C SALES AND SG&A.....	11
SECTION D FURTHER COMPANY AND IMPORT INFORMATION.....	13
SECTION E FURTHER SALES INFORMATION	19
SECTION F AUSTRALIAN MARKET	22

INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping commission (the commission) is conducting a continuation inquiry into wire rope (the goods) exported to Australia from South Africa. The Anti-Dumping Notice No. 2022/007, available on the commission's website, provides details of the goods under consideration, the application and the investigation procedures.

This questionnaire seeks information in relation to your imports and sales of the goods exported to Australia. This information will be used to assist in determining export prices and non-injurious prices, to construct the Australian market for the goods, and in the assessment of the applicant's injury claims.

Any information provided may be used by the commission for any purpose consistent with its statutory functions.

If you do not import the goods or unsure whether you import the goods

Our records indicate that your company is an importer of the goods, and as such, your company is being asked to complete this importer questionnaire. If this is incorrect and your company is not an importer of the goods, or if you are unsure whether the products imported by your company are the goods, please contact the commission as soon as possible.

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, this may affect how the dumping margin applicable to your supplier is determined.

Extension requests

If you require a longer period to complete all or parts of your response to this importer 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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Submitting a response to the importer questionnaire

Responses to the importer questionnaire should be lodged by email listed on the cover page. In submitting the response to the importer questionnaire, you must answer all questions and include all attachments and spreadsheets.

Verification of the information that you supply

The commission may visit your company to discuss the investigation and to verify the information your company provides. We will be in further contact with your company to negotiate a mutually convenient visit timeframe, if required.

In order for such a visit to run smoothly, the commission representatives will need to speak with key company personnel, such as those responsible for imports, sales and company accounts. It would be appreciated if all relevant company records requested, including import documentation, sales information, financial data and any working papers were made available to the commission officers.

The commission appreciates that some of these documents, particularly financial statements, may be confidential to your business and understands a possible reluctance to supply such sensitive information. If the commission cannot gain access to the relevant documentation, it may not be able to use your cost and sales information and may have to rely on other information to establish export prices and assess the Australian industry's injury claims.

It is important that you fully understand the dumping and subsidisation investigation process, and the role of the commission in carrying out the investigation. To this end, the proposed visit to your company will be useful for us to explain in detail the investigation procedures and related issues.

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 importer 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. To the extent that the foreign language version differs, the English translation will be given priority as a matter of interpretation in Australia.
- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same units of 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 D-18)
- 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 manager as soon as possible.
- Where possible, electronic data should be shared with the commission via SIGBOX, a secure online document repository. Please contact the commission to request access to SIGBOX if required.

GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

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

Stranded wire rope, alloy or non-alloy steel, whether or not coated or impregnated, having the following:

- not greater than 9 strands
- diameter not less than 58 mm and not greater than 200 mm,

with or without attachments.

Further information regarding the goods:

- Stranded steel wire rope is rope and strand made of high carbon wire (whether or not containing alloys).
- The strand or rope can also be sheathed or impregnated and sheathed respectively in plastic or composites.
- The wires can be layered-up in various configurations in order to give the strand or rope the desired physical properties.
- Variances can include:
 - *strand diameter*
 - *number of wires*
 - *wire finish (e.g. typically black but may be galvanised)*
 - *wire tensile grade*
 - *type of lubricant*
 - *strand or rope length and*
 - *whether or not an attachment is included (but not limited to ferrules and/or beackets).*
- Cores may be made of:
 - *natural or synthetic fibre or*
 - *Independent Wire Rope Cores ("IWRC"), which may or may not be sheathed or impregnated in plastic.*

Typical uses include applications such as dragline hoist, drag and dump ropes, and shovel hoist, crowd and retract ropes.

Goods excluded from the measures are:

- stranded wire rope that is stainless steel as defined under Note (e) "Stainless steel" to the Tariff
- stranded wire rope with more than 9 strands, regardless of diameter and
- stranded wire rope less than 58 mm or greater than 200 mm in diameter, regardless of number of strands.

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Model Control Code

Details of the model control code (MCC) structure for the goods are in the table below. The sales data (Section C) submitted in this response must follow this MCC structure. At a minimum, the data must report sales separately for each of the mandatory MCC categories identified by the commission.

Item	Category	Sub-category		Sales Data	Cost data
1	Form	C	Coil	Mandatory	Mandatory
		R	Reel		
		D	Drum		
2	Number of strands	#	<i>Specify number</i>	Mandatory	Mandatory
3	Nominal diameter (mm)	#	<i>Specify number</i>	Mandatory	Mandatory
4	Compacted	CC	Compacted	Mandatory	Mandatory
		NC	Not Compacted		
5	Impregnated	NP	Not Plasticated	Mandatory	Mandatory
		P	Plasticated		

In constructing a MCC, use a "-" between each category. For example: C-8-100-CC-P would indicate an 8 strand compacted and plasticated coil wire rope with a 100 mm diameter.

If there are models imported 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 considered deficient.

SECTION A COMPANY AND SUPPLIER INFORMATION

1. Please nominate a contact person within your company:

Name:	[CONFIDENTIAL TEXT DELETED – Haggie Reid contact person details]
Position in the company:	
Telephone:	
E-mail address:	
Haggie Reid has appointed Moulis Legal to represent it for the purpose of this inquiry. Please contact Moulis Legal with all inquiries in the first instance.	

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

Name:	Charles Zhan
Position in the company:	Partner, Moulis Legal
Telephone:	+61 2 6163 1000
E-mail address:	charles.zhan@moulislegal.com

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. Provide the address of where your company's importation, sales and financial records are held.

Haggie Reid holds its importation, sales and financial records at its office address, being 96 Forrester Road, St Marys, New South Wales 2760, Australia

4. What is the legal name of your business and Australian Business Number?

The legal name of the business is Haggie Reid Pty Ltd ("Haggie Reid"). Our ABN is 39 076 723 530.
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5. Does your company trade under a different name and/or brand? If yes, provide details.

No.

6. Was your company ever known by a different legal and/or trading name? If yes, provide details

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Haggie Reid was previously known as:

- Reid Products Pty Ltd, from 10th December 1996 to 25th October 1999; and
- Reid Ropes Pty Ltd, from 25th October 1999 to 7th March 2001

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

Haggie Reid is an importer and distributor of speciality steel products for the mining, construction, industrial and related sectors. Haggie Reid imports and sells wire rope, wire rope accessories and PC strand.

8. Does your company undertake all functions of the importation of the goods, including lodging the import declarations, paying importation costs (e.g. duties, broker's fees, port charges), transportation from the port of discharge. If no, please provide details of the other company and the importation functions undertaken by that company.

Haggie Reid undertakes all functions of importation of the goods.

9. What is the role of your company in the Australian market for the goods? Include details of whether your company can be described as a trader, distributor, retailer or an end-user of the goods.

Haggie Reid is an importer and distributor of the goods.

10. Complete the worksheet named "A-10 Supplier information"

- This worksheet lists your suppliers and manufacturers (if different), their contact details and an estimation of the import volumes from each supplier of the goods over the period.

Please see the A-10 Supplier information worksheet attached. [CONFIDENTIAL ATTACHMENT]

11. The commission may seek to visit your company to discuss the case and to verify the data submitted in your import questionnaire responses. Are there any dates that are unsuitable for this visit?

- A visit by the commission is typically half a day but may take up to a full day.
- Please consider the availability of key staff, such as your accountant, purchasing officer and sales staff.
- Please note that any on-site verification visits will only proceed if permitted under State Government COVID-19 restrictions as well as the commission's COVID-19 internal regulations. If an on-site verification cannot occur, the commission will undertake a virtual verification.

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Haggie Reid confirms its commitments to accommodate the Commission's verification of data submitted in this inquiry, and will coordinate with the Commission to organise such verification with its best effort.

SECTION B

IMPORTS & FORWARD ORDERS

1. After receiving Part A of the questionnaire, the commission will provide you with a full list of import declarations from the Australian Border Force import database of the goods imported by your company during the period. Please review this spreadsheet and confirm whether this is a complete listing of the importation of the goods during the period according your company's records.
 - If the import listing provided does not include all of your importations of the goods over the period, or you have identified any other issues, please contact the case manager as soon as possible.

Haggie Reid has not identified any issues in relation to the information provided at this stage.

2. Complete the worksheet named "B-2 Cost to import and sell" in relation to the selected importations highlighted in the full import listing that will be provided to you in question B.1 above.
 - This worksheet lists the cost to import and sell of selected importations of the goods.
 - Please provide the costs excluding GST.
 - 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.

Please see attached Haggie Reid IQR spreadsheet - B-2 Cost to Import and Sell. [CONFIDENTIAL ATTACHMENT]

3. Complete the worksheet named "B-3 Forward Orders".
 - This worksheet lists your current forward orders of the goods.
 - You must provide this list in electronic format using the template provided.

Please see attached Haggie Reid IQR spreadsheet - B-3 Forward Orders. [CONFIDENTIAL ATTACHMENT]

SECTION C SALES AND SG&A

1. Does your company on-sell your imports in the same condition in which they were imported?

If no:

- Provide details on the products that you sell that contains the goods.
- You do not need to complete remaining questions in this section. Go to Section D.

If yes:

- Complete the remaining questions in this section.

[CONFIDENTIAL TEXT DELETED – Haggie Reid sales arrangement]

2. Complete the worksheet named “C-2 Sales” in relation to importation of the goods that are subsequently sold by your company in the condition in which they were imported over the period.

- This worksheet lists all of your sales (i.e. transaction by transaction) of the goods invoiced within the period.
- If you import the goods from multiple countries, please identify the country of origin of each sale.
- If any of your customers are related to your company, please contact the case manager as soon as possible. The commission may require your related company to also complete this worksheet if that company also subsequently sells the goods in the same condition in which they were imported.
- This worksheet also requests order details where the sale can be directly linked to an importation.
- 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.

Please see attached Haggie Reid IQR spreadsheet - C-2 Sales. [CONFIDENTIAL ATTACHMENT]

3. Complete the worksheet named "C-3 SG&A listing".

- This worksheet lists all selling, general and administration (SG&A) 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.

Please see attached Haggie Reid IQR spreadsheet - C-3 SG&A listing. [CONFIDENTIAL ATTACHMENT]

4. Complete the worksheet named "C-4 SG&A calculation".

- This worksheet calculates your company’s SG&A expenses as a percentage of revenue.
- You must provide this list in electronic format using the template provided.
- Please use the formulas provided.

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Please see attached Haggie Reid IQR spreadsheet - C-4 SG&A calculation.
[CONFIDENTIAL ATTACHMENT]

5. Complete the worksheet name "C-5 Contracts and Tenders"
- This worksheet seeks information on tenders won and lost and contracts entered into.
 - The information is requested from 2017.
 - If you have a sale management system or customer relationship management (CRM) system, an extract from these systems would also be suitable, if it captures the information requested in worksheet C-5.

Please see attached Haggie Reid IQR spreadsheet - C-5 Contracts and Tenders.
[CONFIDENTIAL ATTACHMENT]

SECTION D

FURTHER COMPANY AND IMPORT INFORMATION

1. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint-ventures)? If yes, provide:
 - (a) A diagram showing the complete ownership structure; and
 - (b) A list of all related companies and its functions

[CONFIDENTIAL TEXT DELETED – corporate structure explanation]

2. Is your company or parent company publically listed?

If yes, please provide:

- (a) The stock exchange where it is listed; and
- (b) Any principle shareholders¹

If no, please provide:

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

No, Haggie Reid and Scaw are not publicly listed.

Scaw is owner of 100% of the shares in Haggie Reid. Scaw [CONFIDENTIAL TEXT DELETED – corporate structure and shareholding detail]

3. Provide your company's internal organisation chart.

Please see Attachment D-3 – Haggie Reid Organogram. [CONFIDENTIAL ATTACHMENT]

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

Please refer to the detail in the Attachment D-3 – Haggie Reid Organogram. [CONFIDENTIAL ATTACHMENT]

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

[CONFIDENTIAL TEXT DELETED –promotional activity explanation]

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

¹ 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.

Public Record

Yes, Haggie Reid's financial accounts are audited. The auditor details are:

[CONFIDENTIAL TEXT DELETED – auditor details]

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

Haggie Reid uses the [CONFIDENTIAL TEXT DELETED – system name] accounting system for its financial accounting system.

8. Do you have an electronic system to track your sales and generate invoices? If yes, what is the name of this sales system?

Haggie Reid uses the [CONFIDENTIAL TEXT DELETED – system name] accounting system for its sales.

9. Do you have an electronic system to track your costs of imports? If yes, what is the name of this costing system?

Haggie Reid uses the [CONFIDENTIAL TEXT DELETED – system name] accounting system for its costs.

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

[CONFIDENTIAL TEXT DELETED – financial system integrations]

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

No, Haggie Reid's accounting practices do not differ from the generally accepted accounting principles.

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

No, there have not been any changes to Haggie Reid's accounting practices and/or policies over the last two years.

13. Please provide the two most recently completed annual reports and/or financial statements for your company.

Please see Attachment D-13(1) and (2) for Haggie Reid's 2020 and 2021 financial year audited reports. [CONFIDENTIAL ATTACHMENT]

14. If the financial statements for your company are unaudited, provide for each company:

(a) the tax returns relating to the same period; and

Public Record

- (b) reconciliation of the revenue, cost of goods sold, and net profit before tax between the financial statements and tax returns.

Not applicable, Haggie Reid's financial statements are audited.

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

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

[CONFIDENTIAL TEXT DELETED – profit centre detail]

- 16. If the period is different to your financial period, please provide:

- (a) Income statements directly from your accounting information system covering the most recent financial period and the period; or
- (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.

Please see attached Haggie Reid IQR spreadsheet – D-16 HR Profit and Loss, which cover the requested periods. [CONFIDENTIAL ATTACHMENT]

[CONFIDENTIAL TEXT DELETED – explanation about confidential attachment]

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

Please see Attachments D-17(1) – Haggie Reid Trial Balance, and Attachments D-17(2) and (3) for trial balance General Ledger extracts from the [CONFIDENTIAL TEXT DELETED – accounting system]. [CONFIDENTIAL ATTACHMENTS]

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

Please see attached Haggie Reid IQR spreadsheet – D-18 HR Chart of accounts. [CONFIDENTIAL ATTACHMENT]

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

If yes:

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

Public Record

If no:

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

Yes. Please see attached Haggie Reid IQR spreadsheet – D-19 Product code detail. [CONFIDENTIAL ATTACHMENT]

20. Provide details (and diagrams if appropriate) of the importation process of your company and representatives (e.g. agents) including:

- (a) Price determination and/or negotiation process

[CONFIDENTIAL TEXT DELETED – explanation of importation price determination basis and ongoing consideration influences]

- (b) Order placement process

[CONFIDENTIAL TEXT DELETED – order placement process]

- (c) Order fulfilment process and lead time

As noted, Haggie Reid consider the lead time needed for [CONFIDENTIAL TEXT DELETED – lead time factors] Typically, Haggie Reid places an order about [CONFIDENTIAL TEXT DELETED – timeframe] to ensure the goods meet the expected delivery timeframe for the Australian customer. [CONFIDENTIAL TEXT DELETED – process example]

- (d) Delivery terms and process

Purchases are made on [CONFIDENTIAL TEXT DELETED – delivery term] basis. Shipment of the goods usually takes [CONFIDENTIAL TEXT DELETED – timeframe].

- (e) Invoicing process

[CONFIDENTIAL TEXT DELETED – invoicing process]

- (f) Payment terms and process

[CONFIDENTIAL TEXT DELETED – payment term and explanation of payment process]

21. Do you purchase the goods in Australian Dollars? If not:

- (a) Do you pay your suppliers from a foreign currency denominated account? If yes, provide details;
- (b) Do you use forward contracts to lock in the foreign exchange rate on the purchases? If yes, provide details;

Public Record

- (c) How is the exchange rate determined in your accounting system and how often is it updated?

[CONFIDENTIAL TEXT DELETED – currency details]

22. Are there any suppliers of the goods related to your company? If yes, please provide a list of each related supplier and provide details on how the selling price is set.

Yes. Scaw supplies the goods under consideration to Haggie Reid. The price setting mechanism is explained in detail above at D-20(a).

23. If purchases of the goods made in accordance with price lists or price extras list, provide copies of these lists.

The price setting mechanism is explained in detail above at D-20(a). [CONFIDENTIAL TEXT DELETED – pricing information]

24. Did you receive on-invoice discounts and/or off-invoice rebates from any suppliers or an associates of the suppliers in relation to the importation of the goods during the period? If yes, provide a description and explain the terms and conditions that must be met to obtain the discount and/or rebate.

[CONFIDENTIAL TEXT DELETED – explanation about discount and/or rebates]

25. Were you given any credit or debit notes (directly or indirectly) from any suppliers or associates of the suppliers in relation to the importation of the goods during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

[CONFIDENTIAL TEXT DELETED – explanation about credit and/or debit notes]

26. Is your company provided compensation or reimbursement for any of the costs associated with the importation of the goods from your supplier? If yes, provide details describing the operation of the compensation or reimbursement arrangements and relevant supporting documentation.

[CONFIDENTIAL TEXT DELETED – corporate arrangements]

27. In relation to the selected importations highlighted in the full import listing provided in question B.2, provide the following documentation:

- Contracts
- Purchase order and order confirmation
- Commercial invoice and packing list
- Proof of payment to your supplier and the relevant accounts payable ledger
- Bill of lading
- Documents showing any bank charges
- Invoices for all importation expenses, including:
 - Import broker's fees
 - Import duties

Public Record

- Port handling charges
- Inland transport expenses from the port
- Invoices for ocean freight & marine insurance (if applicable, for example where purchases are made on an ex-works or free-on-board basis)
- Invoices for all exportation expenses, such as inland transport and port handling charges (if applicable, for example where purchases are made on an ex-works basis)
- Country of origin certificates (if applicable)

Please see Attachment D-27 – Selected Shipment Source Documents. [CONFIDENTIAL ATTACHMENTS]

SECTION E FURTHER SALES INFORMATION

If you do not subsequently sell the goods in the same condition in which they were imported, you do not need to complete this section (i.e. you answered "No" in question C.1).

1. Provide details (and diagrams if appropriate) of the sales process of your company and any other related entities including:

- (a) Marketing and advertising activities

[CONFIDENTIAL TEXT DELETED – Haggie Reid marketing and advertising behaviour]

- (b) Price determination and/or negotiation process

[CONFIDENTIAL TEXT DELETED – explanation of price determination and negotiation process for new and existing customers]

- (c) Order placement process

[CONFIDENTIAL TEXT DELETED – customer ordering process]

- (d) Order fulfilment process and lead time

[CONFIDENTIAL TEXT DELETED – explanation of order fulfilment process activity by Haggie Reid and the customer] [CONFIDENTIAL TEXT DELETED – order processing factors]

- (e) Delivery terms and process

[CONFIDENTIAL TEXT DELETED – commercial delivery arrangements]

- (f) Invoicing process

[CONFIDENTIAL TEXT DELETED – customer invoicing process]

- (g) Payment terms and process

[CONFIDENTIAL TEXT DELETED –customer payment term details]

2. Are any customers of the goods 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, Haggie Reid is not related to any of its customers.

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

Public Record

[CONFIDENTIAL TEXT DELETED – explanation of Haggie Reid pricing process]

4. Do your selling prices of the goods 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.

[CONFIDENTIAL TEXT DELETED – customer commentary]

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 goods during the period? If yes, provide a description; and explain the terms and conditions that must be met by the customer to obtain the discount.

[CONFIDENTIAL TEXT DELETED – details of any discount and/or rebates]

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 goods during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

[CONFIDENTIAL TEXT DELETED – details of any credit and or debit notes]

7. Complete worksheet “E-7 Sales source” showing the relevant source of the data used for each column of worksheet “C-2 Sales”.

Haggie Reid compiled the information in the C-2 Sales listing based on information from the [CONFIDENTIAL TEXT DELETED – accounting system] and the relevant sales invoice documentation.

Please see attached Haggie Reid IQR spreadsheet – E-7 Sales source and E-7 Support - Product Details, for supporting information. [CONFIDENTIAL ATTACHMENT]

8. Select the two largest sales 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

Haggie Reid provides the source documentation for [CONFIDENTIAL TEXT DELETED – invoice details] respectively. Please see Attachments E-8(1) and (2). [CONFIDENTIAL ATTACHMENT]

[CONFIDENTIAL TEXT DELETED – explanation of specific customer sales circumstance]

9. For each document, please annotate the documents or provide a table reconciling the details in the “C-2 Sales” listing to the source documents in E.8.

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Please refer to the reference sheet provided with Attachments E-8(1) and (2).
[CONFIDENTIAL ATTACHMENT]

10. Please complete the worksheet named "E-10 Upwards sales" to demonstrate that the "C-2 Sales" listing is 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.

Please see attached Haggie Reid IQR spreadsheet – E-10 Upwards sales worksheet attached. [CONFIDENTIAL ATTACHMENT]

11. Please provide all documents, other than those already provided in Section D, required to complete the "E-10 Upwards sales" worksheet. If the documents include spreadsheets, all formulas used must be retained.

Please see Attachment E-10(1) Upwards Sales, and the supporting tabs which provide sales analysis data from the [CONFIDENTIAL TEXT DELETED – accounting system].
[CONFIDENTIAL ATTACHMENT]

To assist, Haggie Reid also provides extracts from the General Ledger accounts in support. Please see Attachment E-10(2). [CONFIDENTIAL ATTACHMENT]

12. For any amount in the "E-10 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; and
- provide the account code and sub-account code (if applicable) at column E of the worksheet.

Please see detail in attached Haggie Reid IQR spreadsheet – E-10 Upwards sales worksheet attached, and the supporting material referenced at questions E-11.
[CONFIDENTIAL ATTACHMENT]

SECTION F AUSTRALIAN MARKET

Products in the Australian market

1. Generally describe the range of the goods offered for sale in the Australian market. Your description could include information about:

- quality differences
- price differences
- supply/availability differences
- technical support differences
- product segmentation.

Haggie Reid supplies the full range of surface mining ropes required by the Australian market. [CONFIDENTIAL TEXT DELETED – market feedback on product supply]

[CONFIDENTIAL TEXT DELETED – commercial factors]. Based on Haggie Reid's experience, [CONFIDENTIAL TEXT DELETED – product attributes] are the most important consideration for customer's procurement decisions.

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

The subject goods are used for the operation of mining excavator machines, in particular predominantly for use at open cut coal mines.

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

Customers will typically prioritise several factors in making its purchasing decisions. The most important consideration is [CONFIDENTIAL TEXT DELETED – product attributes]. [CONFIDENTIAL TEXT DELETED – explanation of product attribute prioritisation] Further, each customer and site will have its own preference for the rope specification based on the relevant machine and mine site requirements. These requirements will dictate the number of rope strands required, whether the rope is compact or non-compact strands and whether it has plastic or non-plastic coverage.

4. Describe the process by which your customers select your goods and the key factors that informed that decision.

As explained at F-3 above, [CONFIDENTIAL TEXT DELETED – discussion of customer consideration of commercial factors and product attributes]

5. What are the key differences between locally made goods and imported goods? How do these factors impact your customers' purchasing decision?

[CONFIDENTIAL TEXT DELETED – comparison and comment on competitor products]

6. How easily can purchasers change suppliers?

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[CONFIDENTIAL TEXT DELETED – consideration of customer preferences and behaviour]

7. Identify if there are any commercially significant market substitutes in the market for the goods in Australia.

There are no commercially significant market substitutes for the goods. However, new technology that uses hydraulic machines in surface mining is a significant emerging substitute for wire rope, as mining companies replace the steel dragline and hoist line machines with the hydraulic shovels, which do not use wire rope.

8. Have there been any changes in market or consumer preferences for the goods in Australia in the last five years? Do you anticipate any change in preference in the coming five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.

In the market generally, Haggie Reid’s experience is that there has been an ongoing move towards [CONFIDENTIAL TEXT DELETED – product type] market participant behaviour]

Looking forward, Haggie Reid expects [CONFIDENTIAL TEXT DELETED – market change factors].

Prevailing conditions of competition in the Australian market

9. In respect of the Australian market for the goods and the prevailing conditions of competition within the market:

- (a) Provide an overall description of the market for the goods in Australia which explains its main characteristics and trends over the past five years.

The Australian market for the goods is reliant on customers that require wire rope for use in excavator machines operating at mine sites. As explained, in Australia, this is predominantly coal mines. The trends for the goods follow the demand requirements of these mines, and it is Haggie Reid’s experience that coal mine customers in Australia have been [CONFIDENTIAL TEXT DELETED – customer change factor]. Please see detailed response above at F-1 to F-8.

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

As explained, coal mine customers are the primary source of demand for the goods in the Australian market. Haggie Reid estimates that [CONFIDENTIAL TEXT DELETED – percentage] of the Australian customer base for the goods are coal mines.

- (c) Provide your estimate of the proportion (%) of the market that each of those sources of demand listed in (b) represents.

[CONFIDENTIAL TEXT DELETED – customer details]

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- (d) Describe the factors that influence consumption/demand 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.

In Australia there is limited seasonal fluctuation as Australian coal mines operate all year round due to the propensity for exportation of the product. The demand for coal is the biggest driver for the consumption/demand of wire rope in Australia.

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

There is minimal geographic or product segmentations. The coal mines are located in Queensland and New South Wales.

- (f) Provide your estimate of the proportion (%) of the market that each of the market segments listed in (e) represents.

Haggie Reid estimates that for the market about [CONFIDENTIAL TEXT DELETED – percentage] of the mines are in Queensland, [CONFIDENTIAL TEXT DELETED – percentage] in New South Wales and the rest in Western Australian. For Haggie Reid specifically, about [CONFIDENTIAL TEXT DELETED – customer details]. Market detail is provided in the Haggie Reid IQR spreadsheet at tab C-5 Contracts and Tenders. [CONFIDENTIAL ATTACHMENT]

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

Please refer to Haggie Reid's response at F-1 through to F-8 above. [CONFIDENTIAL TEXT DELETED – company market share detail]. [CONFIDENTIAL TEXT DELETED – explanation of market competition and Haggie Reid customer requirements]. Haggie Reid expects that all suppliers respond to customer quote requests, with competition based on [CONFIDENTIAL TEXT DELETED – competition factors]. Since the imposition of anti-dumping measures, [CONFIDENTIAL TEXT DELETED – market share changes]

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

[CONFIDENTIAL TEXT DELETED – explanation of marketing behaviour]

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

Haggie Reid has not identified any additional factors at this time.

10. Describe the commercially significant market participants in the market for the goods in Australia at each level of trade over the inquiry 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), end-user/mine etc.)
- a description of the degree of integration (either vertical or horizontal) for each market participant

Public Record

- an estimation of the market share of each participant.

The commercially significant market participants are BBRG, Haggie Reid and Usha Martin. [CONFIDENTIAL TEXT DELETED – market feedback on product supply]. Market detail is provided in the Haggie Reid IQR spreadsheet at tab C-5 Contracts and Tenders. [CONFIDENTIAL ATTACHMENT]

11. Identify the names of commercially significant importers in the market for the goods in Australia 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.

Other than Haggie Reid, Usha Martin is the commercially significant importers in the Australian market. CAT is the other importer in the market. Market detail is provided in the Haggie Reid IQR spreadsheet at tab C-5 Contracts and Tenders. [CONFIDENTIAL ATTACHMENT]

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

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

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

The current anti-dumping duties are notable import restrictions affecting Scaw/Haggie Reid. Steel wire rope is a highly specialised engineered steel product. Each supplier has its own know-how and proprietary designs. There are also expectations from customers that suppliers need to have proven record and extensive performance data to demonstrate reliability and capability. In this sense, the barriers of entry for new competition in Australia is very high. It is also Haggie Reid's experience that Australian customers require and prioritise suppliers with Australian sales and service representation.

13. Do you anticipate any changes in patterns of supply and demand in the Australian market over the next 1 to 5 years? What are your expectations for your own sales of the goods over that period? Provide any relevant commentary to support your answers

Please refer to our response to similar question at F-8 above.

Relationship between price and cost in Australia

14. Describe the nature of your pricing for the goods (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.

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As mentioned above, BBRG is a dominant supplier in Australia. [CONFIDENTIAL TEXT DELETED – Haggie Reid market behaviour]

15. 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.

Please refer to responses above in relation to the tender process and the commercial factors involved in sales negotiations. As mentioned above, generally speaking [CONFIDENTIAL TEXT DELETED – explanation of market characteristics]

16. How frequently are your Australian selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review.

[CONFIDENTIAL TEXT DELETED – explanation of Haggie Reid price review process]

17. 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
- Level of inventory
- Value of the order
- Volume of the order
- Value of forward orders
- Volume of forward orders
- Customer relationship management
- Desired profit
- Brand attributes
- Other [please define what this factor is in your response].

A key consideration for Haggie Reid will be [CONFIDENTIAL TEXT DELETED – commercial factor]. The other factors listed [CONFIDENTIAL TEXT DELETED – importance of commercial factors]. As mentioned above, [CONFIDENTIAL TEXT DELETED – explanation of customer considerations]