

# Exporter Questionnaire

**Case number:** 611

**Product:** Zinc Coated (Galvanised) Steel

**From:** The Republic of Korea (Korea) and Taiwan

**Inquiry period:** 1 July 2021 to 30 June 2022 (the period)

**Response due by:** 28 September 2022

**Email response to:** [investigations4@adcommission.gov.au](mailto:investigations4@adcommission.gov.au)

**Anti-Dumping Commission website:** [www.adcommission.gov.au](http://www.adcommission.gov.au)

**Responses to the exporter questionnaire must be submitted via SIGBOX. Please contact the Commission on the above email address to request access to SIGBOX.**

## TABLE OF CONTENTS

<b>TABLE OF CONTENTS</b> .....	<b>2</b>
<b>INSTRUCTIONS</b> .....	<b>4</b>
<b>CHECKLIST</b> .....	<b>7</b>
<b>GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES</b> .....	<b>8</b>
<b>SECTION A COMPANY INFORMATION</b> .....	<b>10</b>
A-1    COMPANY REPRESENTATIVE AND LOCATION .....	10
A-2    COMPANY INFORMATION.....	11
A-3    GENERAL ACCOUNTING INFORMATION .....	13
A-4    FINANCIAL DOCUMENTS .....	14
<b>SECTION B EXPORT SALES TO AUSTRALIA</b> .....	<b>17</b>
B-1    AUSTRALIAN EXPORT SALES PROCESS .....	17
B-2    AUSTRALIAN SALES LISTING .....	19
B-3    SAMPLE EXPORT DOCUMENTS.....	19
B-4    RECONCILIATION OF SALES TO FINANCIAL ACCOUNTS .....	20
B-5    RECONCILIATION OF DIRECT SELLING EXPENSES TO FINANCIAL ACCOUNTS .....	21
<b>SECTION C EXPORTED GOODS &amp; LIKE GOODS</b> .....	<b>22</b>
C-1    MODELS EXPORTED TO AUSTRALIA .....	22
C-2    MODELS SOLD IN THE DOMESTIC MARKET .....	23
C-3    INTERNAL PRODUCT CODES .....	24
<b>SECTION D DOMESTIC SALES</b> .....	<b>26</b>
D-1    DOMESTIC SALES PROCESS .....	26
D-2    DOMESTIC SALES LISTING .....	27
D-3    SAMPLE DOMESTIC SALES DOCUMENTS .....	28
D-4    RECONCILIATION OF SALES TO FINANCIAL ACCOUNTS .....	28
<b>SECTION E DUE ALLOWANCE</b> .....	<b>29</b>
E-1    CREDIT EXPENSE .....	29
E-2    PACKAGING .....	29
E-3    DELIVERY .....	30
E-4    OTHER DIRECT SELLING EXPENSES .....	31
E-5    OTHER ADJUSTMENT CLAIMS .....	33
<b>SECTION F THIRD COUNTRY SALES</b> .....	<b>35</b>
F-1    THIRD COUNTRY SALES PROCESS .....	35
F-2    THIRD COUNTRY SALES LISTING .....	35
F-3    DIFFERENCES IN SALES TO THIRD COUNTRIES.....	35
<b>SECTION G COST TO MAKE AND SELL</b> .....	<b>37</b>
G-1.    PRODUCTION PROCESS .....	37
G-2.    COST ACCOUNTING PRACTICES.....	38
G-3    COST TO MAKE ON DOMESTIC MARKET .....	39
G-4    SELLING, GENERAL & ADMINISTRATION EXPENSES .....	40
G-5    COST TO MAKE THE GOODS EXPORTED TO AUSTRALIA .....	40
G-6    COST ALLOCATION METHOD.....	41
G-7    MAJOR RAW MATERIAL COSTS.....	43
G-8    RECONCILIATION OF COST TO MAKE TO AUDITED FINANCIAL STATEMENTS.....	44
G-9    PRODUCTION OF THE GOODS UNDER CONSIDERATION .....	45
G-10   CAPACITY UTILISATION.....	47
<b>SECTION J DOMESTIC MARKET</b> .....	<b>49</b>
J-1    PREVAILING CONDITIONS OF COMPETITION IN THE DOMESTIC MARKET .....	49
J-2    GOODS IN THE DOMESTIC MARKET .....	51

**PUBLIC RECORD**

J-3	RELATIONSHIP BETWEEN PRICE AND COST IN THE DOMESTIC MARKET .....	52
J-4	MARKETING AND SALES SUPPORT IN THE DOMESTIC MARKET .....	55
<b>SECTION K AUSTRALIAN MARKET .....</b>		<b>57</b>
K-1	PREVAILING CONDITIONS OF COMPETITION IN THE AUSTRALIAN MARKET .....	57
K-2	GOODS IN THE AUSTRALIAN MARKET .....	59
K-3	RELATIONSHIP BETWEEN PRICE AND COST IN AUSTRALIA.....	60
K-4	MARKETING AND SALES SUPPORT IN THE AUSTRALIAN MARKET.....	64
<b>EXPORTER'S DECLARATION .....</b>		<b>66</b>

## INSTRUCTIONS

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

The Anti-Dumping Commission (the commission) is conducting continuation inquiry in respect of the anti-dumping measures applying to zinc coated (galvanised) steel exported to Australia from China, Korea and Taiwan.

The commission will use the information you provide to determine normal values and export prices over the inquiry period (the period). This information will determine whether zinc coated (galvanised) steel is dumped.

The commission will collect and use information in accordance with the commission's Collection and Use of Information Policy.

### If you do not manufacture the goods

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

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

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

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

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

### Extension requests

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

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

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

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

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

## PUBLIC RECORD

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 via SIGBOX, a secure online document repository. Please contact the commission on the email address listed on the cover page to request access to SIGBOX.

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 considered as an uncooperative exporter.

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

You are required to lodge a confidential version (OFFICIAL: Sensitive) and a non-confidential version (for publishing on the 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 "**OFFICIAL: Sensitive**" or "**PUBLIC RECORD**".

All information provided to the commission in confidence will be treated accordingly. The public record version of your questionnaire will be placed on the public record, and must contain sufficient detail to allow a reasonable understanding of the substance of the information without breaching confidentiality.

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

All questionnaires are required to have a bracketed explanation of deleted or blacked out information for the public record version of the questionnaire. An example of a statement to accompany deleted/blacked out text is:

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

If such an explanation is not provided, the commission may disregard the information in the submission. Where the public record version of your response to the exporter questionnaire does not contain sufficient detail, your company may be requested to resubmit your response with the required level of detail or, if deadlines have passed, the commission may not have regard to it.

### **Verification of the information that you supply**

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

The verification 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.

The verification may include commission staff meeting your company to conduct virtual verification. Verification meetings typically commences approximately 2 to 4 weeks after the due date of the response to the exporter questionnaire. To assist with the planning of a verification, please contact the commission as soon as possible for a potential verification date to be scheduled.

The onsite verification is usually conducted over 4 days. However, in complex cases, it may be scheduled over 5 days. A verification 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

## PUBLIC RECORD

staff, including your financial accountant, production manager and sales staff. A tour of the manufacturing facility may also be required during the verification.

The commission may elect to undertake an alternative verification methodology, rather than an onsite verification, to satisfy itself of the completeness, relevance and accuracy of the data.

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

A report will be prepared following the verification, 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 margin. The commission considers that the dumping margin is not confidential information, but rather an aggregate figure derived from confidential data.

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

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. 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 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 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.

<b>Section</b>	Please tick if you have responded to all questions
Section A Company information	<input checked="" type="checkbox"/>
Section B Export sales to Australia	<input checked="" type="checkbox"/>
Section C Exported goods & like goods	<input checked="" type="checkbox"/>
Section D Domestic sales	<input checked="" type="checkbox"/>
Section E Due allowance	<input checked="" type="checkbox"/>
Section F Third country sales	<input checked="" type="checkbox"/>
Section G Cost to make and sell	<input checked="" type="checkbox"/>
Section J Domestic market	<input checked="" type="checkbox"/>
Section K Australian market	<input checked="" type="checkbox"/>
Exporter's declaration	<input checked="" type="checkbox"/>
Non-confidential version of this response	<input checked="" type="checkbox"/>

<b>Attachments</b>	Please tick if you have provided spreadsheet
B-2 Australian sales	<input checked="" type="checkbox"/>
B-4 Upwards sales	<input checked="" type="checkbox"/>
B-5 Upwards selling expenses	<input checked="" type="checkbox"/>
D-2 Domestic sales	<input checked="" type="checkbox"/>
F-2 Third country sales	<input checked="" type="checkbox"/>
G-3 Domestic CTM	<input checked="" type="checkbox"/>
G-4.1 SG&A listing	<input checked="" type="checkbox"/>
G-4.2 Dom SG&A calculation	<input checked="" type="checkbox"/>
G-5 Australian CTM	<input checked="" type="checkbox"/>
G-7.2 Raw material CTM	<input checked="" type="checkbox"/>
G-7.4 Raw material purchases	<input checked="" type="checkbox"/>
G-8 Upwards costs	<input checked="" type="checkbox"/>
G-10 Capacity Utilisation	<input checked="" type="checkbox"/>

## GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

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

*Flat rolled products of iron and non-alloy steel of a width less than 600mm and equal to or greater than 600mm, plated or coated with zinc;  
and Flat rolled products of alloyed steel of a width less than 600mm and equal to or greater than 600mm, plated or coated with zinc exported from:  
- China by Angang Steel Co., Ltd or Benxi Iron and Steel (Group) International Economic & Trading Co.; or - Taiwan by Yieh Phui Enterprise Co., Ltd.*

Further information in regard to the goods is available in Anti Dumping Notice 2022/086, which is available on the electronic record for this case.

### Model Control Code

Details of the model control code (MCC) structure for the goods are detailed in the table below. Export sales data (Section B-2), domestic sales data (Section D-2) and cost to make and sell data (Section G-3, G-4 & G-5) submitted in this response must follow this MCC structure. At a minimum, the data must report sales and cost data separately for each of the mandatory MCC categories identified by the commission.

Item	Category	Sub-Category	Identifier	Sales Data	Cost Data
1	Alloy content	Alloy	A	Mandatory	Not applicable
		Non-alloy	NA		
2	Prime	Prime	P	Mandatory	Not applicable
		Non – Prime	N		
3	Steel Base	Hot Rolled	H	Mandatory	Mandatory
		Cold Rolled	C		
4	Coating Type	Zinc Coated (Z)	Z	Mandatory	Mandatory
		Zinc / Iron Alloy Coating (ZF / F)	F		
5	Coating Mass	<= 100 g/m <sup>2</sup>	1	Mandatory	Mandatory
		>100 g/m <sup>2</sup> to <= 220 g/m <sup>2</sup>	2		
		> 220 g/m <sup>2</sup> to <= 300g/m <sup>2</sup>	3		
		>Z300 g/m <sup>2</sup> to <= 400 g/m <sup>2</sup>	4		
		>400 g/m <sup>2</sup>	5		
6	Steel Grade	G2 / SGCC / SGHC	A	Mandatory	Mandatory
		G3 / SGCD	B		
		G250 / SGC 340 / SGHC 340 / SGC 340 / SGHC 340	C		
		G300 / G350 / SGC 400 / SGHC 400 / SGC 440 / SGCH 440 / SGC 490 / SGHC 490	D		
		G450 / G500	E		
		G550 / SGC 570	F		
		Other	G		
7	Base Metal	< 0.40 mm	1	Mandatory	Mandatory
		=> 0.40 mm to < 0.50 mm	2		
		=> 0.50 mm to < 0.75 mm	3		



**PUBLIC RECORD**

	Thickness (BMT)	=> 0.75 mm to < 1.00 mm	4		
		=> 1.00 mm to < 1.50 mm	5		
		=> 1.50 mm to < 2.00 mm	6		
		=> 2.00 mm to < 2.50 mm	7		
		=> 2.50 mm	8		
8	Width	< 600 mm	A	Mandatory	Optional
		=> 600 mm to <= 1220mm	B		
		> 1220mm	C		
9	Form	Coil	C	Mandatory	Optional
		Sheet	S	Mandatory	Optional

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

The MCCs will be used to 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 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 considered deficient.

## SECTION A COMPANY INFORMATION

### A-1 Company representative and location

1. Please nominate a contact person within your company:

Name:  
Position in the company:  
Telephone:  
E-mail address:

**ANSWER:** Please see below for the requested information of the contact person of Yieh Phui Enterprise Co., Ltd. ("Yieh Phui") for the purpose of this continuation inquiry:

**Name:** Mr. Bob Chih-Ming Chang  
**Position in the company:** Manager, East Asia & Oceania Section, Global Marketing & Sales Division I  
**Telephone:** +886-7-6117181 Ext. 7442  
**E-mail address:** [C232@yiehphui.com.tw](mailto:C232@yiehphui.com.tw)

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

Name:  
Address:  
Telephone:  
E-mail address:

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

**ANSWER:** For the purpose of this continuation inquiry, Yieh Phui has nominated a representative with the contact details as follows:

**Name:** Jay Y. Nee  
**Company:** Appleton Luff Pte. Ltd.  
**Position in the company:** Partner  
**Telephone:** +65-91052831  
**E-mail address:** [nee@appletonluff.com](mailto:nee@appletonluff.com)

3. Please provide the location of the where your company's financial records are held.

**ANSWER:** Yieh Phui's financial records are held at its head office at the following address:

369 Yu Liao Road, Chiao Tou District, Kaohsiung, Taiwan, R.O.C.

4. Please provide the location of the where your company's production records are held.

**ANSWER:** Yieh Phui's production records are held at its head office at the following address:

369 Yu Liao Road, Chiao Tou District, Kaohsiung, Taiwan, R.O.C.

**PUBLIC RECORD**

5. Please provide the location of your company’s production plant manufacturing the goods under consideration.

**ANSWER:** Yieh Phui’s plants manufacturing the goods under consideration are located at the following address:

(1) Kaohsiung Works:

369 Yu Liao Road, Chiao Tou District, Kaohsiung, Taiwan, R.O.C.

(2) Pingtung Works:

6, Industrial 6th Rd, Ping Tung Industrial Park, Ping Tung City, Taiwan, R.O.C.

**A-2 Company information**

1. What is the legal name of your business?

**ANSWER:** Yieh Phui’s legal name is Yieh Phui Enterprise Co., Ltd.

2. Does your company trade under a different name and/or brand? If yes, provide details.

**ANSWER:** No, Yieh Phui does not trade under a name or brand other than its legal name.

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

**ANSWER:** No, Yieh Phui was never known by a different legal or trading name.

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

**ANSWER:** There was no change to Yieh Phui’s board of directors in the last two years.

Please see below for a list of Yieh Phui’s board of directors:

<u>Position</u>	<u>Name</u>
Chairman	Mr.Lin, I-Shou
Director	Mr. Liang, Pyng-Yeong
Director	Mr.Wu, Lin-Maw
Director	Mr.Huang, Ching-Tsung
Independent Director	Mr.Chang, Wen-I
Independent Director	Mr.Hsun, Chin-Shu
Independent Director	Mr.Yang, Te-Yuan

5. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint-ventures)? If yes, provide:

- (a) A diagram showing the complete ownership structure; and
- (b) A list of all related companies and its functions

**ANSWER:** Yieh Phui is a member of “E United Group” in Taiwan. “E United Group” is not a legal entity but a group of companies associated and/or under the common control of Mr. I. S. Lin, Yieh Phui’s chairman. Other than the steel industry, E United Group is also involved in businesses such as education, health care, and real estate development. In Exhibit1: A-2.5-1,

please see a chart showing the cross shareholding between the E United Group member companies. In Exhibit 2: A-2.5-2, please also see a list of Yieh Phui's affiliates.

6. Is your company or parent company publically listed?  
If yes, please provide:  
(a) The stock exchange where it is listed; and  
(b) Any principle shareholders<sup>1</sup>  
If no, please provide:  
(a) A list of all principal shareholders and the shareholding percentages.

**ANSWER:** Yieh Phui is a publically traded company listed on Taiwan Stock Exchange. During the inquiry period, Yieh Phui had more than 120,000 shareholders. In Exhibit 3: A-2.6, please see a list of Yieh Phui's top ten largest shareholders during the inquiry period.

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

**ANSWER:** Yieh Phui is a manufacturer of galvanized steel, aluminium-zinc coated steel, pre-painted steel and steel structure. During the inquiry period, Yieh Phui produced and sold the above-mentioned products in the domestic and export markets. Please also visit Yieh Phui's website for further information on the nature of Yieh Phui's business:  
<http://www.yiehphui.com.tw/>.

8. If your business does not perform all of the following functions in relation to the goods under consideration, then please provide names and addresses of the companies which perform each function:  
(a) produce or manufacture;  
(b) sell in the domestic market;  
(c) export to Australia; and  
(d) export to countries other than Australia.

**ANSWER:** During the inquiry period, Yieh Phui performed all of the above-mentioned functions in relation to the goods under consideration.

9. Provide your company's internal organisation chart.

**ANSWER:** Please see Exhibit 4: A-2.9 for Yieh Phui's internal organization chart. Yieh Phui's operating units are organized by function.

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

**ANSWER:** Yieh Phui has two business divisions, one for coated steel and the other for steel structure. The coated steel division is in charge of the production and sale of coated steel and pre-painted steel; this is the division in which the goods under consideration are produced and sold. The steel structure division is in charge of the production and sale of steel structures and cranes.

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<sup>1</sup> 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.

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

**ANSWER:** Please see Exhibit 5: A-2.11-1 for Yieh Phui's company brochure. Please see also Exhibit 6: A-2.11-2 for the brochure of E United Group.

### **A-3 General accounting information**

1. What is your financial accounting period?

**ANSWER:** Yieh Phui uses the calendar year, i.e., from January 1 through December 31, as its financial accounting period.

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

**ANSWER:** Yieh Phui's financial accounts are periodically audited by certified public account. The auditor is Crowe (TW) CPAs.

3. What currency are your accounts kept in?

**ANSWER:** The accounting currency is New Taiwan Dollars (or NTD).

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

**ANSWER:** Yieh Phui's computer system is a self-developed one using Oracle Developer 2000 as the software development tool. Yieh Phui's financial system is called "Financial System" under which there are various modules covering different areas of the company's financial accounting activities, such as "Securities Management Module", "Accounts Receivable Management Modules", etc.

5. What is the name of your sales system?

**ANSWER:** Yieh Phui's sales system is centred on the company's "Order System" in its computer system. Like other systems in the company, the "Order System" has several modules under it to cover different types of work, such as "Order Management Module" and "Customers Management Module", etc. As part of the sales-related system is the "Vessel Shipping Management System", which covers the management of vessel shipping arrangement of the export sales.

6. What is the name of your production system?

**ANSWER:** Yieh Phui's production system consists of "Production Planning System" and "Production System". The "Production Planning System" is used to manage Yieh Phui's production planning and schedule, while the "Production System" is used to manage the factory production activities on a production line basis.

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.

**ANSWER:** Yieh Phui's computer system is a module-based system under which each sub-system or module covers a specific area of the company operations. The sub-systems or modules are integrated electronically. The major sub-systems include Order Management System, Product Specification System, Production Planning System, Inventory Management System, Production System, Laboratory Management System, General Affairs Management System and Financial System.

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

**ANSWER:** Yieh Phui follows the generally accepted accounting principles of Taiwan. As a publicly traded company listed on the Taiwan Stock Exchange, Yieh Phui has adopted the International Financial Reporting Standards ("IFRS") since 2013, as required by the Financial Supervisory Commission of Taiwan. Yieh Phui's fiscal year follows the calendar year and it is Yieh Phui's accounting practice to report its financials on a monthly basis. Thus, Yieh Phui prepares its monthly financial reports such as balance sheets and income statements in the normal course of business. Yieh Phui's accounts are periodically audited by public certified accountants, and its yearly audited financial statements, both consolidated and unconsolidated, are reported on an annual basis.

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

**ANSWER:** No, there has been no change to Yieh Phui's accounting practices or policies over the last two years.

#### **A-4 Financial Documents**

1. Please provide the two most recently completed annual reports and/or financial statements for your company and any other related companies involved in the production and sale of the goods.

**ANSWER:** Please see the following for the requested information.

(1) Yieh Phui's annual reports and audited financial statements:

- **Exhibit 7: A-4.1-1:** Yieh Phui 2020 annual report
- **Exhibit 8:A-4.1-2:** Yieh Phui 2021 annual report
- **Exhibit 9: A-4.1-3:** Yieh Phui audited financial statements of 2020 (consolidated)
- **Exhibit 10: A-4.1-4:** Yieh Phui audited financial statements of 2021 (consolidated)
- **Exhibit 11: A-4.1-5:** Yieh Phui audited financial statements of 2020 (unconsolidated)
- **Exhibit 12: A-4.1-6:** Yieh Phui audited financial statements of 2021 (unconsolidated)

(2) Yieh Phui's related companies which were involved in the production of the goods

During the inquiry period, there was no related company involved in Yieh Phui's production of the goods. However, during the inquiry period, there were three related companies (i.e., [NAME OF RELATED RAW MATERIAL SUPPLIER], [NAME OF RELATED RAW MATERIAL SUPPLIER], and [NAME OF RELATED RAW MATERIAL SUPPLIER]) supplied Yieh Phui with hot-rolled steel and/or cold-rolled steel for Yieh Phui's production of the goods

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under consideration. Thus, we have provided the audited financial statements of above mentioned related companies as follows:

- Exhibit 13: A-4.1-7: [NAME OF RELATED RAW MATERIAL SUPPLIER] audited financial statements of 2020
- Exhibit 14: A-4.1-8: [NAME OF RELATED RAW MATERIAL SUPPLIER] audited financial statements of 2021
- Exhibit 15: A-4.1-9: [NAME OF RELATED RAW MATERIAL SUPPLIER] audited financial statements of 2020
- Exhibit 16: A-4.1-10: [NAME OF RELATED RAW MATERIAL SUPPLIER] audited financial statements of 2021
- Exhibit 17: A-4.1-11: [NAME OF RELATED RAW MATERIAL SUPPLIER] audited financial statements of 2020
- Exhibit 18: A-4.1-12: [NAME OF RELATED RAW MATERIAL SUPPLIER] audited financial statements of 2021

(3) Yieh Phui's related companies which were involved in the sales of the goods

During the inquiry period, there was no related companies involved in Yieh Phui's sales of the goods under consideration to Australia.

During the inquiry period, Yieh Phui had one related company, [NAME OF RELATED CUSTOMER], that purchased from Yieh Phui the goods under consideration and resold them in the domestic market. Yieh Phui sold the like goods to another related company, [NAME OF RELATED CUSTOMER], for its own consumption as packing materials. In addition, Yieh Phui had one related company, [NAME OF RELATED SERVICE PROVIDER], that provided seaport warehousing and stevedoring services to Yieh Phui in Taiwan for Yieh Phui's sales of the goods under consideration to Australia. Thus, we are submitting the audited financial statements of [Shin Phui] and [Pacific] as follows:

- Exhibit 19: A-4.1-13: [NAME OF RELATED CUSTOMER] audited financial statements of 2020
- Exhibit 20: A-4.1-14: [NAME OF RELATED CUSTOMER] audited financial statements of 2021
- Exhibit 21: A-4.1-15: [NAME OF RELATED SERVICE PROVIDER] audited financial statements of 2020
- Exhibit 22: A-4.1-16: [NAME OF RELATED SERVICE PROVIDER] audited financial statements of 2021

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.

**ANSWER:** This question is not applicable, as the financial statements provided in the answer to A-4.1 are all audited.

3. Does your company maintain different profit centres? If yes, provide profit & loss statements for the profit centre that the goods falls into for:
- (a) the most recent financial year; and
  - (b) the period.

**ANSWER:** No, Yieh Phui does not maintain different profit centers. Yieh Phui's profit and loss are calculated on a company-wide basis covering all products.

**PUBLIC RECORD**

4. If the period is different to your financial period, please provide:
- (a) Income statements directly from your accounting information system covering the most recent financial period and the period; or
  - (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.

**ANSWER:**      **The inquiry period is not consistent with Yieh Phui's financial period. Therefore, in Exhibit 23: A-4.4, Yieh Phui submits its pre-audit income statement of year 2021 and monthly pre-audit income statement during the inquiry period.**

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

**ANSWER:**      **In Exhibit 24: A-4.5, please see the requested trial balance (pre-audit) of Yieh Phui for year 2021 and the inquiry period.**

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

**ANSWER:**      **Please see Exhibit 25:A-4.6 for Yieh Phui's chart of accounts.**

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



## SECTION B EXPORT SALES TO AUSTRALIA

### B-1 Australian export sales process

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

**ANSWER:** During the inquiry period, all of Yieh Phui's exports of the goods under consideration to Australia were made to [NUMBER] Australian customer, [NAME OF AUSTRALIAN CUSTOMER]"). For Yieh Phui's Australian sales of the goods under consideration, Yieh Phui negotiated sales terms with [NAME OF AUSTRALIAN CUSTOMER], a company which partners with [NAME OF AUSTRALIAN CUSTOMER]. The sales process of Yieh Phui's exports of the goods under consideration is detailed as follows:

During the inquiry period, Yieh Phui provided [NAME OF PARTNER OF AUSTRALIAN CUSTOMER] with its update of product prices periodically. The sales process typically began when [NAME OF PARTNER AUSTRALIAN CUSTOMER] solicited detailed and formal price quotations from Yieh Phui based on the intended product mix and the respective quantities. Yieh Phui then responded with detailed price quotations to [NAME OF PARTNER OF AUSTRALIAN CUSTOMER] and both parties would negotiate on the terms of sales either via phone calls or email.

After the sales terms were resolved, Yieh Phui then prepared a written sales contract to [NAME OF AUSTRALIAN CUSTOMER] directly pursuant to the terms agreed upon by Yieh Phui and [NAME OF PARTNER OF AUSTRALIAN CUSTOMER] for [NAME OF AUSTRALIAN CUSTOMER] counter-signature.

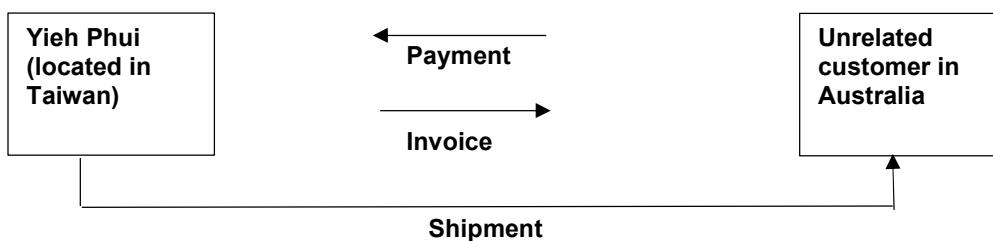
After the signed sales contract was received by Yieh Phui, an internal order memorandum was prepared by Yieh Phui's sales department in the company's system for its production department. Production planning and preparation then began pursuant to the order.

After production, the goods were shipped directly from Taiwan to Australia. The commercial invoice and packing list were issued by Yieh Phui to [NAME OF AUSTRALIAN CUSTOMER] at or about the time of shipment. The delivery terms of Yieh Phui's sales during the inquiry period were all on an [SALES TERM] or [SALES TERM] basis.

The term of payment for Yieh Phui's export sales of GUC to Australia during the inquiry period were based on Yieh Phui's standard payment term (i.e., either "[PAYMENT TERM]" or "[PAYMENT TERM]").

The documentation and product shipment flow can be demonstrated by the chart as follows:

**PUBLIC RECORD**



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

**ANSWER:** Yieh Phui invoices its customers for goods exported to Australia in U.S. dollars, not in local currency. In receiving payments from its customers for goods exported to Australia, customers are instructed to make payment into the bank accounts dominated in U.S. dollars. In the normal course of business, Yieh Phui does not use forward contracts to lock in the U.S. dollar exchange rate relating to sales to Australia or other export sales. The U.S. dollar exchange rates that Yieh Phui uses for its accounting purposes are based on the commercial exchange rates and the rate is normally updated every ten days.

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.

**ANSWER:** No, Yieh Phui is not related to the Australian customer of the goods exported by Yieh Phui to Australia.

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

**ANSWER:** In the normal course of business, Yieh Phui does not use price lists for its export or domestic sales. However, Yieh Phui does have price guidance prepared on a monthly basis. Such price guidance is prepared by Yieh Phui's sales department for the sales representatives to use as a base price in negotiating with customers. The final selling price, however, is still subject to the negotiations with customers in consideration of various economic factors such as product specifications, quantity, shipment date, market situation, etc.

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.

**ANSWER:** No, Yieh Phui's export selling prices do not vary according to the distribution channel.

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

**ANSWER:** No, Yieh Phui did not provide on-invoice discounts 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 inquiry period.

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.

**ANSWER:** No, Yieh Phui did not issue any credit or debit notes, directly or indirectly, to the customer or associate of the customer in relationship to the sales of the goods exported to Australia during the inquiry period.

8. In establishing the date of sale, the commission will normally use the date of invoice as it best reflects the material terms of sale. If you are making a claim that a different date should be taken as the date of sale:
- (a) What date are you claiming as the date of sale?
  - (b) Why does this date best reflect the material terms of sale?

**ANSWER:** Yieh Phui is not making a claim that a date other than the invoice date should be used as the date of sale for this duty assessment. Thus, this question is not applicable.

## **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.
  - 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.

**ANSWER:** Please see Exhibit 26: B-2.1 for the worksheet named "B-2 Australian sales".

2. Complete worksheet "B-2.2 Australian sales source" showing the relevant source of the data used for each column of worksheet "B-2 Australian sales".

**ANSWER:** Please also see Exhibit 27: B-2.2 for the table "B-2.2 Australian sales source" listing the source of the data for each column identified 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

## PUBLIC RECORD

- 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.

**ANSWER:** Please see Exhibit 28-1: B-3.2-1 and Exhibit 29-1: B-3.2-2 for a copy of the sales documentation of the two largest invoices by value of Yieh Phui’s exports of the goods to Australia. Specifically, Exhibit 28-1 contains the sample sales documents for the largest Australian sale by value, i.e., internal invoice number [INVOICE NUMBER] (together with internal invoice numbers of [INVOICE NUMBER] to constitute the external invoice number [INVOICE NUMBER]). On the other hand, Exhibit 29-1 contains the sample sales documents for the second largest Australian sale by value, i.e., internal invoice number [PPG05Z0] (together with internal invoice numbers of [INVOICE NUMBER] to constitute the external invoice number [INVOICE NUMBER]).

For each direct selling expense incurred for the sample invoices, we have also included in Exhibit 28-2: B-3.1-1 through Exhibit 28-4: B-3.2-1 and Exhibit 29-2: B-3.1-2 through Exhibit 29-4: B-3.2-2 the calculation worksheets and supporting documents demonstrating how the direct selling expenses have been calculated for reporting purposes.

### **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; and
  - provide the account code and sub-account code (if applicable) at column E of the worksheet.

**ANSWER:** Please see Exhibit 30: B-4.3-1 for the requested “B-4 Upwards sales” listing. As part of Exhibit 30: B-4.3-1, Yieh Phui has provided the monthly breakdowns of sales revenue recorded in each of the respective account during the inquiry period. Please also see Exhibit 31: B-4.3-2 for the documents supporting the information reported in “B-4 Upwards sales” listing. In providing the supporting documents for Exhibit 31: B-4.3-2, Yieh Phui has

selected one month during the inquiry period to provide the general ledger for each sales revenue account.

### **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 expense” worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
  - the name of the source document, including the relevant page number, in column C of the worksheet; and
  - highlight or annotate the amount shown in the source document; and
  - provide the account code and sub-account code (if applicable) at column D of the worksheet.

**ANSWER:** Please see **Exhibit 32: B-5.3-1** for “B-5 Upwards selling expense” worksheet. Please also see **Exhibit 33: B-5.3-2** for the documents supporting the information reported in “B-5 Upwards selling expense” listing. In providing the supporting documents for **Exhibit 33: B-5.3-2**, Yieh Phui has selected one month during the data period to provide the general ledger for each associated direct selling expenses account.

## 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.

**ANSWER:** During the inquiry period, most of the goods under consideration Yieh Phui exported to Australia were all made pursuant to Australian Standard AS 1397 covering a wide range of the product characteristics identified in the reported MCCs.

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

**ANSWER:** Please see below for a list showing all the MCCs of the goods under consideration that Yieh Phui exported to Australia during the inquiry period:

NA-P-C-Z-1-C-1-A-C	NA-P-C-Z-5-D-5-B-C
NA-P-C-Z-1-C-1-B-C	NA-P-C-Z-5-F-3-B-C
NA-P-C-Z-3-C-3-B-C	NA-P-C-Z-5-F-4-B-C
NA-P-C-Z-3-C-4-B-C	NA-P-C-Z-5-F-5-B-C
NA-P-C-Z-3-C-5-B-C	NA-P-H-Z-3-C-6-B-C
NA-P-C-Z-3-C-6-B-C	NA-P-H-Z-3-C-7-B-C
NA-P-C-Z-3-D-3-B-C	NA-P-H-Z-3-C-7-B-S
NA-P-C-Z-3-D-4-A-C	NA-P-H-Z-3-C-8-B-C
NA-P-C-Z-3-D-4-B-C	NA-P-H-Z-3-C-8-C-C
NA-P-C-Z-3-D-4-C-C	NA-P-H-Z-3-E-6-B-C
NA-P-C-Z-3-D-5-B-C	NA-P-H-Z-3-E-7-B-C
NA-P-C-Z-3-D-6-B-C	NA-P-H-Z-3-E-8-B-C
NA-P-C-Z-3-E-5-B-C	NA-P-H-Z-4-D-6-B-C
NA-P-C-Z-3-E-6-B-C	NA-P-H-Z-4-E-6-A-C
NA-P-C-Z-3-E-7-B-C	NA-P-H-Z-4-E-6-B-C
NA-P-C-Z-3-E-7-B-S	NA-P-H-Z-4-E-6-C-C
NA-P-C-Z-3-F-3-B-C	NA-P-H-Z-4-E-7-A-C
NA-P-C-Z-3-F-4-B-C	NA-P-H-Z-4-E-7-B-C
NA-P-C-Z-3-F-5-B-C	NA-P-H-Z-4-E-7-B-S
NA-P-C-Z-4-D-5-B-C	NA-P-H-Z-4-E-7-C-C
NA-P-C-Z-4-D-6-B-C	NA-P-H-Z-4-E-8-B-C
NA-P-C-Z-4-E-5-B-C	NA-P-H-Z-4-E-8-B-S
NA-P-C-Z-4-E-6-A-C	NA-P-H-Z-4-E-8-C-C
NA-P-C-Z-4-E-6-B-C	NA-P-H-Z-5-C-7-B-C
NA-P-C-Z-4-E-6-C-C	NA-P-H-Z-5-C-8-B-C
NA-P-C-Z-4-E-7-B-C	NA-P-H-Z-5-E-7-B-S

**PUBLIC RECORD**

NA-P-C-Z-4-G-6-B-C	NA-P-H-Z-5-E-8-B-S
NA-P-C-Z-5-C-4-B-C	

**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.

**ANSWER:** During the inquiry period, the goods under consideration Yieh Phui sold in the domestic market include products made pursuant to various international, national and Yieh Phui standards such as AS 1397, ASTM A653, CNS 1244, EN10346, JIS G3302, etc., covering a wide range of the product characteristics identified in the reported MCCs.

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.

**ANSWER:** Please see below for a list showing all the MCCs of the goods under consideration that Yieh Phui sold in the domestic market during the inquiry period:

NA-P-H-Z-2-A-7-B-C	NA-P-H-Z-2-D-6-B-C	NA-N-C-Z-3-E-5-C-C	NA-N-H-Z-2-E-8-B-C
NA-P-H-Z-2-A-6-B-C	NA-N-H-Z-5-A-8-C-C	NA-P-H-Z-3-E-8-B-C	NA-N-C-Z-2-A-1-A-C
NA-P-C-Z-3-D-4-B-C	NA-N-H-Z-4-E-7-B-C	NA-P-C-Z-3-D-6-B-C	NA-N-C-Z-1-C-1-B-C
NA-P-C-Z-3-D-5-B-C	NA-N-C-Z-2-C-5-C-C	NA-P-C-Z-5-A-5-B-C	NA-N-C-Z-1-B-3-C-C
NA-N-C-Z-2-A-5-B-C	NA-N-H-Z-5-A-6-C-C	NA-N-C-Z-1-A-4-B-C	NA-N-C-Z-2-F-4-C-C
NA-N-C-Z-2-A-3-B-C	NA-N-H-Z-3-G-6-C-C	NA-N-H-Z-3-G-6-B-C	NA-P-C-Z-2-B-2-B-C
NA-P-H-Z-3-C-6-B-C	NA-P-C-Z-3-E-5-C-C	NA-P-C-Z-4-E-5-B-C	NA-N-C-Z-3-D-4-B-C
NA-N-C-Z-1-A-5-C-C	NA-N-H-Z-3-D-7-B-C	NA-P-C-Z-3-A-2-B-C	NA-P-C-Z-2-F-4-C-C
NA-N-C-Z-1-A-2-B-C	NA-N-H-Z-2-A-8-B-C	NA-P-C-Z-2-A-6-C-C	NA-P-C-Z-2-F-3-B-C
NA-N-C-Z-2-A-2-C-C	NA-N-H-Z-2-A-7-B-C	NA-N-C-Z-3-A-6-B-C	NA-N-C-Z-3-C-4-C-C
NA-N-C-Z-2-A-4-C-C	NA-N-C-Z-5-A-6-C-C	NA-N-C-Z-2-D-3-B-C	NA-N-C-Z-3-D-6-C-C
NA-P-H-Z-2-A-8-B-C	NA-P-C-Z-2-A-2-B-C	NA-P-H-Z-4-E-8-B-C	NA-P-H-Z-2-D-8-C-C
NA-P-H-Z-4-E-7-B-C	NA-P-C-Z-2-A-3-B-C	NA-P-H-Z-3-C-7-B-C	NA-N-H-Z-5-E-6-B-C
NA-N-C-Z-3-A-3-B-C	NA-N-C-Z-1-A-5-B-C	NA-P-C-Z-2-D-2-B-C	NA-N-C-Z-2-A-5-C-C
NA-P-C-Z-3-D-3-B-C	NA-P-C-Z-1-D-5-B-C	NA-N-C-Z-3-B-3-B-C	NA-N-H-Z-1-A-4-B-C
NA-P-C-Z-3-C-6-B-C	NA-P-C-Z-1-D-3-B-C	NA-N-H-Z-2-D-6-B-C	NA-P-H-Z-3-E-7-B-C
NA-P-C-Z-2-A-6-B-C	NA-P-C-Z-3-A-6-B-C	NA-N-C-Z-3-C-3-C-C	NA-P-C-Z-1-A-5-B-C
NA-P-C-Z-1-A-4-B-C	NA-N-C-Z-3-D-6-B-C	NA-N-C-Z-3-C-5-C-C	NA-N-C-Z-3-E-3-B-C
NA-P-C-Z-2-C-4-B-C	NA-N-C-Z-3-E-5-B-C	NA-N-H-Z-3-D-6-C-C	NA-N-H-Z-4-D-6-B-C
NA-P-C-Z-2-A-4-B-C	NA-P-C-Z-2-A-4-C-C	NA-N-C-Z-3-G-3-B-C	NA-N-H-Z-3-E-8-C-C
NA-P-C-Z-2-D-6-B-C	NA-P-C-Z-2-A-3-C-C	NA-N-C-Z-2-B-3-B-C	NA-N-C-Z-3-E-6-B-C
NA-P-C-Z-2-A-5-B-C	NA-P-C-Z-3-G-5-B-C	NA-P-H-Z-2-E-7-C-C	NA-P-C-Z-2-A-7-B-C
NA-N-C-Z-3-A-4-B-C	NA-P-C-Z-3-A-5-B-C	NA-N-H-Z-3-C-7-C-C	NA-N-H-Z-5-E-8-B-C
NA-N-C-Z-2-C-3-B-C	NA-N-H-Z-3-E-7-B-C	NA-N-C-Z-3-D-3-B-C	NA-P-C-Z-1-A-6-B-C
NA-N-C-Z-3-A-1-C-C	NA-N-C-Z-2-A-4-B-C	NA-N-H-Z-5-C-8-B-C	NA-N-C-Z-3-F-3-C-C
NA-N-C-Z-1-A-3-B-C	NA-N-C-Z-2-D-4-C-C	NA-N-H-Z-5-A-7-C-C	NA-N-C-Z-2-C-1-C-C
NA-N-C-Z-3-D-5-B-C	NA-N-C-Z-2-A-1-B-C	NA-P-H-Z-4-D-8-B-C	NA-P-C-Z-1-B-2-C-C
NA-N-C-Z-3-D-4-C-C	NA-N-H-Z-3-A-8-B-C	NA-N-C-Z-5-C-3-C-C	NA-P-C-Z-5-D-6-B-C
NA-N-C-Z-3-A-5-C-C	NA-P-C-Z-4-D-5-B-C	NA-N-H-Z-2-E-7-B-C	NA-N-H-Z-3-E-6-C-C
NA-N-C-Z-3-A-2-B-C	NA-N-C-Z-3-A-4-C-C	NA-N-C-Z-3-B-2-C-C	NA-P-H-Z-5-D-6-B-C

**PUBLIC RECORD**

NA-N-C-Z-3-A-6-C-C	NA-N-C-Z-2-D-5-B-C	NA-N-C-Z-5-E-5-C-C	NA-P-H-Z-2-A-6-C-C
NA-N-C-Z-1-A-1-C-C	NA-P-C-Z-3-E-7-B-C	NA-N-C-Z-3-G-6-C-C	NA-P-H-Z-3-D-7-B-C
NA-N-C-Z-3-A-2-C-C	NA-N-C-Z-2-A-3-C-C	NA-N-H-Z-2-A-6-B-C	NA-N-C-Z-3-B-5-B-C
NA-N-C-Z-2-C-2-B-C	NA-P-C-Z-3-A-6-C-C	NA-P-C-Z-4-E-6-C-C	NA-N-C-Z-3-D-8-B-C
NA-N-C-Z-2-A-1-C-C	NA-P-C-Z-3-G-3-B-C	NA-P-H-Z-5-A-8-C-C	NA-N-C-Z-3-C-6-B-C
NA-P-C-Z-2-D-5-B-C	NA-P-C-Z-2-A-1-B-C	NA-P-H-Z-3-D-8-B-C	NA-P-C-Z-3-D-4-C-C
NA-N-C-Z-1-A-1-B-C	NA-N-C-Z-2-B-2-B-C	NA-N-H-Z-3-C-7-B-C	NA-N-H-Z-5-D-8-C-C
NA-N-C-Z-2-A-2-B-C	NA-P-C-Z-2-A-5-C-C	NA-P-C-Z-3-A-4-B-C	NA-N-C-Z-2-A-7-B-C
NA-P-H-Z-5-C-8-B-C	NA-P-H-Z-3-C-8-B-C	NA-P-H-Z-4-G-8-B-C	NA-P-H-Z-5-A-8-B-C
NA-N-C-Z-3-A-3-C-C	NA-P-H-Z-3-A-7-B-C	NA-P-C-Z-3-A-3-B-C	NA-P-H-Z-3-D-6-B-C
NA-N-C-Z-3-D-2-B-C	NA-P-H-Z-3-A-6-B-C	NA-N-H-Z-3-D-7-C-C	NA-P-C-Z-2-C-1-C-C
NA-N-C-Z-3-F-4-B-C	NA-P-C-Z-1-A-1-B-C	NA-P-H-Z-3-D-7-C-C	NA-P-C-Z-3-E-6-B-C
NA-N-C-Z-1-B-3-B-C	NA-P-C-Z-1-A-2-B-C	NA-N-H-Z-3-E-8-B-C	NA-N-H-Z-3-D-8-B-C
NA-N-C-Z-3-D-5-C-C	NA-P-C-Z-2-A-2-C-C	NA-N-C-Z-2-F-3-B-C	NA-N-C-Z-1-D-5-B-C
NA-N-C-Z-3-F-5-B-C	NA-P-C-Z-3-C-1-B-C	NA-N-C-Z-3-C-5-B-C	NA-N-H-Z-3-C-8-C-C
NA-N-C-Z-3-C-3-B-C	NA-P-C-Z-2-C-1-B-C	NA-P-H-Z-2-D-7-B-C	NA-N-H-Z-3-G-8-A-C
NA-N-C-Z-2-B-1-B-C	NA-N-C-Z-2-B-2-C-C	NA-P-H-Z-2-D-8-B-C	NA-N-C-Z-2-A-6-B-C
NA-N-C-Z-3-G-5-C-C	NA-N-C-Z-2-C-1-B-C	NA-P-C-Z-2-D-3-B-C	NA-P-C-Z-3-C-6-C-C
NA-N-C-Z-3-A-5-B-C	NA-N-C-Z-3-C-2-C-C	NA-N-C-Z-1-F-1-B-C	NA-P-H-Z-5-D-8-C-C
NA-N-C-Z-4-F-1-B-C	NA-N-C-Z-3-E-6-C-C	NA-P-C-Z-3-D-6-C-C	NA-N-C-Z-2-C-2-C-C
NA-P-H-Z-3-A-8-B-C	NA-N-C-Z-4-E-6-B-C	NA-P-C-Z-3-A-1-B-C	NA-N-C-Z-5-F-4-B-C
NA-P-C-Z-3-G-4-B-C	NA-P-C-Z-4-E-6-B-C	NA-N-C-Z-3-C-2-B-C	NA-N-H-Z-5-A-8-B-C
NA-N-C-Z-3-D-3-C-C	NA-P-H-Z-2-A-8-C-C	NA-P-C-Z-2-A-1-C-C	NA-N-H-Z-4-E-8-C-C
NA-N-C-Z-3-F-2-B-C	NA-P-C-Z-1-B-1-B-C	NA-P-C-Z-2-D-4-B-C	NA-P-H-Z-5-A-7-C-C
NA-N-C-Z-1-A-6-C-C	NA-P-C-Z-3-A-5-C-C	NA-N-C-Z-2-A-6-C-C	NA-P-C-Z-2-E-5-B-C
NA-P-C-Z-2-B-3-C-C	NA-P-C-Z-3-A-3-C-C	NA-P-C-Z-2-B-1-B-C	NA-P-C-Z-3-D-2-C-C
NA-N-C-Z-2-D-1-B-C	NA-N-C-Z-1-B-2-B-C	NA-N-C-Z-2-F-2-B-C	NA-N-C-Z-3-D-2-C-C
NA-N-C-Z-3-A-1-B-C	NA-P-H-Z-4-E-6-B-C	NA-P-C-Z-3-C-5-B-C	NA-N-C-Z-3-F-3-B-C
NA-N-C-Z-3-F-1-B-C	NA-N-C-Z-2-B-3-C-C	NA-P-C-Z-2-D-5-C-C	NA-N-C-Z-1-B-1-C-C
NA-N-C-Z-1-A-2-C-C	NA-N-H-Z-2-E-7-C-C	NA-P-C-Z-3-D-5-C-C	NA-P-C-Z-3-C-4-B-C
NA-P-C-Z-2-B-3-B-C	NA-N-H-Z-4-E-6-B-C	NA-N-C-Z-3-G-4-B-C	NA-N-C-Z-2-C-5-B-C
NA-N-C-Z-2-F-1-B-C	NA-P-H-Z-2-E-7-B-C	NA-N-C-Z-2-E-6-B-C	NA-P-H-Z-3-E-8-C-C
NA-N-C-Z-3-C-1-B-C	NA-N-C-Z-1-D-3-B-C	NA-N-C-Z-3-G-5-B-C	NA-N-C-Z-3-E-7-B-C
NA-N-C-Z-1-C-4-C-C	NA-N-H-Z-2-D-8-B-C	NA-N-H-Z-3-A-7-C-C	NA-N-H-Z-2-A-8-C-C
NA-N-C-Z-1-B-2-C-C	NA-N-C-Z-1-D-4-B-C	NA-N-C-Z-3-C-4-B-C	NA-N-H-Z-3-A-8-C-C
NA-N-H-Z-3-D-6-B-C	NA-P-C-Z-3-A-4-C-C	NA-N-C-Z-3-C-6-C-C	NA-P-H-Z-1-A-4-B-C

### C-3 Internal product codes

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

If yes:

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

If no:

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



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**ANSWER:** In the normal course of business, Yieh Phui does not have a product code system which covers all the characteristics of products it produces and sells. For the purpose of sales revenue categorization, Yieh Phui uses a three-digit product category code system. In **Exhibit 34: C-3.1-1**, please see a list of Yieh Phui's three-digit product category codes. It should be noted that there is no coding rule designed for each digit of the code, and each three-digit product category code represents a unique category of products.

For the purpose of MCC reporting for this submission, Yieh Phui has relied on various sources of information held in the company's system. Please also see **Exhibit 35: C-3.1-2** for a table showing the data source Yieh Phui has relied on in preparing each of the product characteristic of the MCCs in this submission. Please also see **Exhibit 36: C-3.1-3** for the supporting documents of the MCC assigned to a sample good under consideration.

## SECTION D DOMESTIC SALES

### D-1 Domestic sales process

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

**ANSWER:** In the normal course of business, the domestic customer solicits price quotations via telephone, email or fax. Yieh Phui then provides its offers and negotiates the price and other terms of sale with the customer either via telephone, email or fax. The customer then confirms the order once sales price, sales quantity and other essential terms are agreed upon by both parties. Yieh Phui's sales representative then enters the order into the company's computer system. Yieh Phui begins production based on the production order entered into the system by the sales department. Once the production is finished, the shipment is arranged based on the term of delivery established. A Government Uniform Invoice ("GUI") is issued by Yieh Phui to the customer on the date of shipment.

During the inquiry period, Yieh Phui had terms of delivery either on a "[DELIVERY TERM]" basis or on an "[DELIVERY TERM]" basis, and the payment term on a "[PAYMENT TERM]" basis.

In the normal course of business, Yieh Phui does not use price lists for its export or domestic sales. However, Yieh Phui does have price guidance prepared on a monthly basis. Such a price guidance is prepared by Yieh Phui's sales department for the sales representatives as a reference in negotiating with customers. The final selling price, however, is still subject to the negotiations with customers in consideration of various factors such as product specifications, quantity, target shipment date, market situation, etc.

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

**ANSWER:** Yes, during the inquiry period, Yieh Phui had domestic sales of the goods under consideration to the following related customers:

- [NAME OF RELATED CUSTOMER]
- [NAME OF RELATED CUSTOMER]

The selling prices set by Yieh Phui for sales to the above-mentioned related customers were not different from the selling prices set by Yieh Phui for unrelated customers.

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

**ANSWER:** As explained above, Yieh Phui does not use price lists in its normal course of business. Thus, this question is not applicable.

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.

**ANSWER:** No, Yieh Phui's domestic selling prices do not vary according to the distribution channel.

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

**ANSWER:** During the inquiry period, Yieh Phui's did not provide any on-invoice discounts or off-invoice rebates to its domestic customers or an associate of the customer in relation to the sale of the like goods.

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.

**ANSWER:** This question is not applicable, as Yieh Phui did not issue any credit or debit notes to its domestic customers during the inquiry period.

7. In establishing the date of sale, the commission will normally use the date of invoice as it best reflects the material terms of sale. If you are making a claim that a different date should be taken as the date of sale:
- What date are you claiming as the date of sale?
  - Why does this date best reflect the material terms of sale?

**ANSWER:** Yieh Phui is not making a claim that a date different from the invoice date should be used as the date of sale. Thus, this question is not applicable.

## **D-2 Domestic sales listing**

- Complete the worksheet named "D-2 Domestic sales"
  - This worksheet lists all domestic sales (i.e. transaction by transaction) of like goods invoiced within the period, even if they are models not exported to Australia
  - If you have claimed in B-1.8 and/or D-1.7 that the date of sale is one other than the invoice date, then add the sales within your claimed date of sale.
  - You must provide this list in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.
  - If there are any other costs, charges or expenses incurred in respect of the sales listed which have not been identified in the table in question D-2 above, add a column for each item. For example, certain other selling expenses incurred.
- Complete worksheet "D-2.2 domestic sales source" listing the source of the data used for each column in worksheet "D-2 domestic sales".

**ANSWER:** Please see Exhibit 37: D-2.2-1 for the "D-2 Domestic sales". Please also see Exhibit 38: D-2.2-2 for the requested table "D-2.2 domestic sales source" which lists 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.

**ANSWER:** Please see Exhibit 39: D-3.2-1 and Exhibit 40: D-3.2-2 for a copy of the sales documentation of the two largest invoices by value of Yieh Phui's domestic sales of the like goods.

### D-4 Reconciliation of sales to financial accounts

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

1. Please complete the worksheet named "B-4 Upwards sales" to demonstrate that the sales listings in D-2 and F-2 are complete.
  - You must provide this list in electronic format using the template provided.
  - Please use the currency that your accounts are kept in.
  - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Please provide all documents, other than those in A-4, D-2 and F-2, required to complete the "B-4 Upwards sales" worksheet. If the documents include spreadsheets, all formulas used must be retained.
3. For any amount in the "B-4 Upwards sales" worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
  - the name of the source document, including the relevant page number, in column D of the worksheet; and
  - highlight or annotate the amount shown in the source document; and
  - provide the account code and sub-account code (if applicable) at column E of the worksheet.

**ANSWER:** In the worksheet named "B-4 Upwards sales" provided in Exhibit B-4.3-1, Yieh Phui has provided the requested reconciliation of its domestic sales of the goods.

## SECTION E DUE ALLOWANCE

### E-1 Credit expense

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

**ANSWER:** No, Yieh Phui's standard payment term for its domestic sales of the like goods requires Yieh Phui's customers to make payment prior to shipment.

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

**ANSWER:** No, Yieh Phui's standard payment term for its Australian sales of the goods under consideration requires Yieh Phui's customers to make payment prior to shipment.

### E-2 Packaging

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

**ANSWER:** Yieh Phui's packing method does not vary by geographic market. Rather, Yieh Phui's packing method varies as a result of customer's request transaction by transaction. Thus, certain packing types are commonly used for both export and domestic sales. For reporting purpose, Yieh Phui has allocated the packing costs incurred (including packing

materials, manufacturing overhead and labor) at the packing unit during the inquiry period to each packing type. The allocated type-specific packing costs are then assigned to the goods sold to Australia and in the domestic market on a coil-by-coil basis pursuant to the packing type of each coil. Please see Exhibit 41: E-2.3 for the packaging expenses calculation worksheet for the per unit packaging cost for each packing type.

### **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?

**ANSWER:** Yes, during the inquiry period, Yieh Phui delivered the like goods to its customers for some of its domestic sales. Yieh Phui incurred three types of inland freight for the delivery of the like goods of Yieh Phui's domestic sales, including (1) inland freight incurred for the delivery of the like goods to the warehouse outside Yieh Phui's factory, (2) inland freight incurred for the delivery of the goods to the processing service provider for the cutting or slitting of the like goods, and (3) inland freight incurred for the delivery of the like goods to the customers. In calculating the above-mentioned three types of inland freight, Yieh Phui has traced the inland freight actually incurred to each domestic sale. The inland freight of each shipment is then allocated to the associated steel coils by quantity.

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

**ANSWER:** All of Yieh Phui's sales of the goods to Australia during the inquiry period were made on either an "[SALES TERM]" or on an "[SALES TERM]" basis.

3. If the delivery terms of the Australian sales includes delivery to the port, how was the inland transport calculated in the Australian sales listing in B-2?

**ANSWER:** All of Yieh Phui's sales of the goods to Australia during the inquiry period were made on either on an "[SALES TERM]" or on an "[SALES TERM]" basis. Thus, Yieh Phui incurred inland freight for delivering the goods to the [NAME OF SEAPORT].

During the inquiry period, Yieh Phui incurred three types of inland freight for the delivery of the goods to the port, including (1) inland freight incurred for the delivery of the like goods to the warehouse outside Yieh Phui's factory, (2) inland freight incurred for the delivery of the goods to the processing service provider for the cutting or slitting of the like goods, and (3) inland freight incurred for the delivery of the like goods to the port. In calculating the above-mentioned three types of inland freight, Yieh Phui has traced the inland freight actually incurred to each Australian sale. The inland freight of each shipment is then allocated to the associated steel coils by quantity.

4. If the delivery terms of the Australian sales includes port handling and other export charges, how were these expenses calculated in the Australian sales listing in B-2?

**ANSWER:** Yes, Yieh Phui incurred brokerage and handling charge for the customs declaration of the sales of the goods to Australia. In calculating the brokerage and handling

charge, Yieh Phui has traced the brokerage and handling charge actually incurred for each customs declaration. The brokerage and handling charge for each customs declaration is then allocated to the steel coils of the associated Australian sales by quantity.

5. If the delivery terms of the Australian sales includes ocean freight, how was the ocean freight cost calculated in the Australian sales listing in B-2?

**ANSWER:** This question is not applicable, as all of Yieh Phui's sales of the goods to Australia during the inquiry period were made on an "[SALES TERM]" or "[SALES TERM]" basis and Yieh Phui did not incur any ocean freight for its Australian sales.

6. If the delivery terms of the Australian sales includes marine insurance, how was the marine insurance calculated in the Australian sales listing in B-2?

**ANSWER:** This question is not applicable, as all of Yieh Phui's sales of the goods to Australia during the inquiry period were made on an "[SALES TERM]" or "[SALES TERM]" basis, and Yieh Phui did not incur any marine insurance for its Australian sales.

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

**ANSWER:** This question is not applicable, as all of Yieh Phui's sales of the goods to Australia during the inquiry period were made on an "[SALES TERM]" or "[SALES TERM]" basis, and Yieh Phui did not incur any Australian importation and delivery costs for its Australian sales.

#### **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.

**ANSWER:** No, Yieh Phui did not pay any sales commission for its domestic sales of like goods or its export sales of the goods to Australia during the inquiry period. Thus, this question is not applicable.

2. Are there any differences in tax liability between domestic and export sales? If yes, provide details, for example:

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

**ANSWER:** Under the value-added tax laws of Taiwan, Yieh Phui charges five percent value added tax ("VAT") when making sales in the domestic market (the so-called output tax). On the other hand, Yieh Phui pays the VAT tax at the rate of five percent when purchasing raw material/supplies domestically or importing the raw materials/supplies (the so-called input tax). According to the Value Added and Non-value Added Business Tax Act of Taiwan, the amounts of VAT tax "payable or overpaid by a business will be the difference between the output tax in a tax period and the input tax in the same period." In other words, the VAT Yieh

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Phui charges for sales is offset by the VAT paid by Yieh Phui for purchases. Accordingly, it is an accepted accounting principle in Taiwan to post the VAT for the amount of sales separately from the account receivable account. Yieh Phui thus does not claim the adjustment for the VAT it collects from its domestic customers.

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

**ANSWER:** During the inquiry period, for a small quantity of domestic sales of the like goods, Yieh Phui incurred warranty expenses as a result of the customer's claim of defective products. In compensating the customer for product defect, Yieh Phui granted rebate to the customer as credit for future sales. In reporting warranty expenses, Yieh Phui traced the expenses incurred to the product items which gave rise to the customer's claim, and reported the warranty expenses to the corresponding sales entry of the product items.

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

**ANSWER:** During the inquiry period, Yieh Phui has also incurred the following direct selling expenses for its Australian sales of the goods:

**"Other cost 1 - Trade promotion fee"**

Yieh Phui incurred trade promotion fees for exports to Australia. Yieh Phui has reported the trade promotion fee actually incurred for the goods sold to Australia during the inquiry period, on a coil-by-coil basis. This expense was paid to Taiwan government. This expense is booked in Yieh Phui's account of [ACCOUNT CODE AND ACCOUNT NAME].

**"Other cost 2 - Harbor construction fee"**

Yieh Phui has reported the harbor construction fee actually incurred for the goods sold to Australia during the inquiry period, on a coil-by-coil basis. This expense was paid to Taiwan government. This expense is booked in Yieh Phui's account of [ACCOUNT CODE AND ACCOUNT NAME].

**"Other cost 3 - Cargo certification fee"**

Yieh Phui has reported the cargo certification fee actually incurred for the goods sold to Australia during the inquiry period, on a coil-by-coil basis. This expense was paid to a third party cargo certifier before ocean shipment. This expense is booked in Yieh Phui's account of [ACCOUNT CODE AND ACCOUNT NAME].

**"Other cost 4 - Stevedoring fee"**



Yieh Phui has reported the cargo stevedoring fee actually incurred for the goods sold to Australia during the inquiry period, on a coil-by-coil basis. This expense was paid to a stevedoring service provider for services rendered at the seaport of Taiwan. This expense is booked in Yieh Phui's account of [ACCOUNT CODE AND ACCOUNT NAME].

**“Other cost 5 - Warehousing expense”**

Yieh Phui has reported the warehousing expense actually incurred for the goods sold to Australia during the inquiry period, on a coil-by-coil basis. This expense was paid to a warehousing service provider for services rendered at the seaport of Taiwan. This expense is booked in Yieh Phui's account of [ACCOUNT CODE AND ACCOUNT NAME].

**“Other cost 6 – Bank charge”**

Yieh Phui has reported the bank charge actually incurred for the goods sold to Australia during the inquiry period, on a coil-by-coil basis. This expense was paid to the banks for receiving the payment from the Australian customer. This expense is booked in Yieh Phui's account of [ACCOUNT CODE AND ACCOUNT NAME].

**“Other cost 7 – Containerization fee”**

During the inquiry period, some of Yieh Phui's sales of the goods to Australian were shipped in container. For these sales, Yieh Phui has reported the containerization expense and ancillary expenses (e.g., bill of lading documentation fee, container seal fee and container hanging fee) actually incurred for the goods sold to Australia, on a coil-by-coil basis. This expense was paid to a service provider for services rendered at the seaport of Taiwan. This expense is booked in Yieh Phui's account of [ACCOUNT CODE AND ACCOUNT NAME].

**“Other cost 8 – Bill of lading documentation fee”**

For sales of the goods to Australia which were not shipped in container, Yieh Phui did not incur the containerization fee, but Yieh Phui still incurred bill of lading fees. For these sales, Yieh Phui has reported the bill of lading documentation expense actually incurred for the goods sold to Australia during the inquiry period, on a coil-by-coil basis. This expense was paid to a forwarder in Taiwan. This expense is booked in Yieh Phui's account of [ACCOUNT CODE AND ACCOUNT NAME].

## **E-5 Other adjustment claims**

1. Are there any other adjustments required to ensure a fair comparison between the export price and the normal value (based on domestic sales, costs and/or third country sales)? If yes, provide details.
  - An adjustment will only be made where there is evidence that the difference affects price comparability.
  - Refer to Chapter 15 of the *Dumping and Subsidy Manual (December 2021)*<sup>2</sup> for more information.

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<sup>2</sup> Available on the commission website

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**ANSWER:** This question is not applicable, as Yieh Phui is not making a claim of other adjustments.

## 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.

**ANSWER:** Yieh Phui's sales process to any third country is generally the same as the sales process of Yieh Phui's Australian sales of the goods.

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.

**ANSWER:** During the inquiry period, [NUMBER] among Yieh Phui's third country customers are related to Yieh Phui. Yieh Phui America, Inc., was involved in Yieh Phui's sales to the United States. [NAME OF RELATED CUSTOMER] was involved in Yieh Phui's sales to China and New Zealand. [NAME OF RELATED CUSTOMER] was involved in Yieh Phui's sales to Fiji, New Zealand Spain and Belgium. The selling prices set by Yieh Phui for sales to the above-mentioned related customers were not different from the selling prices set by Yieh Phui for unrelated customers.

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

**ANSWER:** Yieh Phui is not making a claim that a date different from the invoice date should be used as the date of sale. Thus, this question is not applicable.

### F-2 Third country sales listing

1. Complete the worksheet named "F-2 Third country sales"
  - This worksheet lists all export sales, summarised by country, customer and MCC, to third countries of like goods invoiced within the period.
  - While sales may be made in different currencies and on different shipping terms the sales listing also seeks to record an Ex-works value of these sales in your local currency.
  - 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. Complete worksheet "F-2.2 third country sales source" listing the source of the data for each column in the worksheet "F-2 third country sales".

**ANSWER:** Please see Exhibit 42: F-2.2-1 for the requested worksheet named "F-2 Third country sales". Please also see Exhibit 43: F-2.2-2 for a table "F-2.2 third country sales source" listing the data source of the "F-2 Third country sales" listing.

### 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.

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**ANSWER:** There is no significant difference in sales to third countries which may affect their comparison to export sales to Australia.

## 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.

**ANSWER:** Yieh Phui's production process of the goods under consideration involves three main production steps, i.e., pickling, cold-rolling and zinc coating. The production process can be summarized as follows:

At the pickling stage, the hot-rolled steel coil is first processed by passing through hydrochloric acid baths to remove surface scale. It is then edge trimmed to the intended width. The hot-rolled steel coils consumed as this stage are purchased from outside suppliers rather than self-produced by Yieh Phui.

At the cold-rolling stage, the pickled hot-rolled coil produced from the pickling stage is then introduced into the reversing cold-rolling mill to reduce the base metal thickness.

At the coating stage, the pickled hot-rolled coil and the cold-rolled coil (in-house and outsourced) are then introduced into the continuous coating line for zinc coating. Zinc ingots are placed into the coating baths as the material inputs. Once coated, the coil is then skin-passed and/or tension levelled depending on the customer's request. At this stage, surface treatment such as oiling, chromating, and resin coating is conducted if the customer so requests. Upon completion, the zinc-coated steel coils are then sent to the packing unit for packaging.

After the zinc coating stage, certain coils may be further processed at another cost center named "Coil Treatment" for slitting as steel strips or for cutting to length as steel sheets.

Please also see Yieh Phui's company brochure in which a detailed production process of the goods is provided. Please see Exhibit 44: G-1.1 for a list showing the scrap (and by-product) generated from each of the above-mentioned production processes.

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.

**ANSWER:** During the inquiry period, the following related companies supplied Yieh Phui with major raw material inputs and/or services:

(1) Hot-rolled steel coils

- [NAME OF RELATED RAW MATERIAL SUPPLIER]
- [NAME OF RELATED RAW MATERIAL SUPPLIER]
- [NAME OF RELATED RAW MATERIAL SUPPLIER]

(2) Cold-rolled steel coils

- [NAME OF RELATED RAW MATERIAL SUPPLIER]

(3) Seaport warehousing and stevedoring services for Australian sales

- [NAME OF RELATED SERVICE PROVIDER]

## G-2. Cost accounting practices

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

**ANSWER:** Yieh Phui's cost accounting system is based on actual costs.

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.

**ANSWER:** This question is not applicable, as Yieh Phui's cost accounting system is based on actual costs rather than standard costs.

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.

**ANSWER:** Yes, Yieh Phui has different cost centers in the company's cost accounting system. Please see Exhibit 45: G-2.3 for a list of Yieh Phui's cost centres.

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

**ANSWER:** In the normal course of business, Yieh Phui's cost accounting system calculates and records production costs by production line, without differentiating costs between product types or the geographic markets. For example, Yieh Phui's zinc coating stage produces three types of products: (1) galvanized steel coil, (2) 5% aluminium-zinc coated steel coil, and (3) 55% aluminium-zinc coated steel coil, and there are four production lines at Yieh Phui's zinc coating process. For cost accounting purposes, Yieh Phui calculates production-line-specific (rather than product model specific) cost of manufacturing in its normal course of business. Thus, each zinc coating line has one unit cost of manufacturing for all three types of products being produced.

5. Are there any costs for management accounting purposes valued differently to financial accounting purposes? If yes, provide details of the differences.

**ANSWER:** No, there are no costs for management accounting purposes which are valued differently to financial accounting purposes.

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.

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- (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.

**ANSWER:** No, Yieh Phui was not engaged in any start-up operations in relation to the goods during the inquiry period.

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

**ANSWER:** Inventories for raw materials, work-in-process and finished goods are stated at the lower of cost or net realizable value.

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

**ANSWER:** In the normal course of business, the damaged or sub-standard goods are valued in the same way as the prime goods.

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

**ANSWER:** Scrap and by-products are valued by market prices. Yieh Phui does not have joint products produced in the normal course of business.

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

**ANSWER:** No, there are no management fees or corporate allocations charged to Yieh Phui.

### **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.

**ANSWER:** Please see Exhibit 46: G-3.1-1 for the requested worksheet "G-3 Domestic CTM". Please also see Exhibit 47: G-3.1-2 for a table entitled "G-3 All CTM" which includes all the goods under consideration falling within the product scope that were produced by Yieh Phui for all the geographic markets during the inquiry period.

2. Complete worksheet titled "G-3.2 domestic CTM source" listing the source of the data for each column of the worksheet "G-3 domestic CTM".

**ANSWER:** Please see Exhibit 48: G-3.2 for table “G-3.2 domestic CTM source” listing the data source for 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, including finance expenses, by account code for the most recent accounting period and the period.
  - The SG&A listing should reconcile to the trial balance and/or income statement.
  - 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.

**ANSWER:** Please see Exhibit 49: G-4.2-1 for the requested worksheet “G-4.1 SG&A listing”. It should be noted that in reporting the SG&A expenses for the purpose of “G-4.1 SG&A listing”, Yieh Phui has included, in addition to selling and general & administration expense, the financial income/expenses and non-operating income/expenses, because the financial income/expenses and non-operating income/expenses are also related to Yieh Phui’s overall operations. Please also see Exhibit 50: G-4.2-2 for the requested worksheet “G-4.2 Domestic SG&A calculation”.

## **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.

**ANSWER:** Please see Exhibit 51: G-5.1 for the requested worksheet “G-5 Australian CTM” listing.

2. Complete worksheet titled “G-5.2 Australian CTM source” listing the source of the data for each column of worksheet “G-5 Australian CTM”.

**ANSWER:** Please see Exhibit 52: G-5.2 for the table “G-5.2 Australian CTM source” listing the data source for the “G-5 Australian CTM” listing.



## G-6 Cost allocation method

1. What is the allocation method used to complete in G-3 domestic CTM and G-5 Australian CTM for:
  - (a) Raw materials
  - (b) Labour
  - (c) Manufacturing overheads

**ANSWER:** Yieh Phui has reported the total direct material costs by including the consumption costs of hot-rolled steel coils, cold-rolled steel coils and zinc ingots. In addition, Yieh Phui has included the scrap offsets in the material costs. We explain the methodologies applied in reporting the costs of the above-mentioned fields as follows:

### (1) Raw material costs - hot-rolled steel coils and cold-rolled steel coils

Yieh Phui is not an integrated steel manufacturer and it purchases mainly hot-rolled steel coils and occasionally cold-rolled steel coils for the production of the goods under consideration in the normal course of business.

In calculating the consumption cost of hot-rolled steel coils and cold-rolled steel coils of each model, Yieh Phui first calculated the total, actual consumption costs of these inputs for each quarter during the inquiry period. Yieh Phui then identified for each model of the goods produced during each quarter of the inquiry period whether a hot-rolled steel coil or cold-rolled steel coil that had been used as the raw material for production. Yieh Phui then allocated the total consumption cost of each of these inputs by the respective production quantity of each model to reach the model-specific consumption costs of hot-rolled and cold-rolled steel.

### (2) Raw material costs - zinc ingots

To produce the goods, Yieh Phui consumes zinc ingots for the purpose of metal coating. In calculating the consumption cost of zinc ingots for each model, Yieh Phui first calculated the total actual consumption costs of ingots for each quarter during the inquiry period. The actual consumption cost of zinc ingots was then allocated to the goods under consideration on the basis of the theoretical coating weight. In calculating the theoretical coating weight for each product, Yieh Phui's computer system has applied the following formula:

$$W = A \times B \times C$$

Where:

W = theoretical metal coating weight of coil  
A = coating mass set for each coil  
B = width of coil  
C = length of coil

The theoretical zinc coating weight above was then used as the allocation factor for the allocation of the actual consumption cost of zinc ingots to each model.

### (3) Other material costs - Scrap offsets

In the normal course of business, Yieh Phui generates steel scrap and zinc scrap in producing the goods under consideration. These scraps are collected and sold to unrelated domestic customers in the normal course of business.

For reporting purposes, Yieh Phui has reported the scrap offsets as part of the direct material costs based on the actual sales value of these scraps during the inquiry period. In calculating the steel scrap offset for each model, Yieh Phui has allocated the total steel scrap sales revenue of each quarter to each model based on the respective production quantity of each model. On the other hand, in calculating the zinc scrap offset for each model, Yieh Phui has allocated the total zinc scrap sales revenue of each quarter to each model based on the respective theoretical coating weight of each model.

(4) Direct labor

In calculating the direct labor cost on a model-specific basis, Yieh Phui has allocated the direct labor costs incurred in each quarter during the inquiry period to each model by processing time.

(5) Manufacturing overheads

In calculating the manufacturing overhead costs on a model basis, Yieh Phui has allocated the manufacturing overheads, including variable and fixed overheads, incurred in each quarter during the inquiry period to each model by processing time.

(6) Other costs - Packing costs

In calculating the manufacturing overhead costs on a model basis, Yieh Phui has allocated the packing costs incurred in each quarter during the inquiry period to each model by production quantity.

(7) Cost of goods sold adjustments

Yieh Phui has included cost of goods sold ("COGS") adjustments in the reported CTM to reflect various cost items captured directly under the account of cost of goods sold in the normal course of business that have not been accounted for in the reported cost of manufacturing. The COGS adjustments consist of the rebates Yieh Phui received from its raw material supplier for its purchases of hot-rolled steel coils and some cost adjustments made by Yieh Phui during the inquiry period. To calculate the cost of COGS adjustments, Yieh Phui first divided the total adjustment amount incurred during the inquiry period by the company-wide COGS. The resulting ratio is then multiplied by the cost of manufacturing of each model to reach the reported COGS adjustments for each model. Exhibit 53: G-6.1 for the calculation worksheet of COGS adjustments ratio.

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 method described in G-6.1 from your normal cost accounting system to the cost for that model reported in G-3.1.

**ANSWER:** Please see Exhibit 54-1: G-6.2-1 through Exhibit 54-5: G-6.2-4 for Yieh Phui's quarterly cost calculation worksheets which include the calculations of each cost component under the cost to make. Please note that for the MCCs with an additional code of "K" in the last digit, those products are intended for further downstream production as pre-painted steel coils and thus are not the goods under consideration.

## G-7 Major raw material costs

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

**ANSWER:** The major raw materials used in the manufacture of the goods include hot-rolled steel coils, cold-rolled steel coils, and zinc ingots.

2. Are any raw materials sourced as part of an integrated production process or from a subsidiary company which your company exercise control? If yes, complete the worksheet named "G-7.2 Raw material CTM" for these raw materials.
  - This worksheet lists the quarterly cost to make the raw material manufactured within the period.
  - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold).
  - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the raw material, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
  - You must provide this list in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.

**ANSWER:** As explained in the answer to question G-1.2 above, Yieh Phui purchased hot-rolled and cold-rolled steel coils from its related companies during the inquiry period. Please see Exhibit 55: G-7.2 for the requested worksheet named "G-7.2 Raw material CTM". It should be noted that while [NAME OF RELATED RAW MATERIAL SUPPLIER] is a manufacturer of hot-rolled steel, [NAME OF RELATED RAW MATERIAL SUPPLIER] and [NAME OF RELATED RAW MATERIAL SUPPLIER] acted as resellers in supplying Yieh Phui with the raw materials. Thus, the CTM reported in the worksheet named "G-7.2 Raw material CTM" represents either the cost to make (for [NAME OF RELATED RAW MATERIAL SUPPLIER]) or the purchase costs (for [NAME OF RELATED RAW MATERIAL SUPPLIER] and [NAME OF RELATED RAW MATERIAL SUPPLIER])

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.

**ANSWER:** For the production of the goods, the raw material input costs of hot-rolled steel coils, cold-rolled steel coils and zinc ingots collectively account for approximately [PERCENTAGE]% of the CTM.

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4. For each raw material identified in G-7.3 which individually account for 10% or more of the total cost to make, complete the worksheet named “G-7.4 Raw material purchases”
- This worksheet lists all raw material purchases (i.e. transaction by transaction) purchased by your company within the period.
  - You must provide this list in electronic format using the template provided.
  - If you have used formulas to complete this worksheet, these formulas must be retained.

**ANSWER:** Please see **Exhibit 56: G-7.4** for the requested worksheet named “G-7.4 Raw material purchases” for Yieh Phui’s purchases costs of hot-rolled steel coils and cold-rolled steel coils during the inquiry period.

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

**ANSWER:** Please see **Exhibit 57: G-7.5** for the data source 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 listed in “G-7.4 Raw material purchases” listing to relevant purchase ledgers or trial balances in your accounting system. Provide copies of all documents used to demonstrate the reconciliation.

**ANSWER:** Please see the following exhibits for the requested information:

- **Exhibit 58-1: G-7.6-1:** supporting documents for hot-rolled steel coils purchases 1
- **Exhibit 58-2: G-7.6-1:** supporting documents for hot-rolled steel coils purchases 2
- **Exhibit 59-1: G-7.6-2:** supporting documents for cold-rolled steel coils purchases 1
- **Exhibit 59-2: G-7.6-2:** supporting documents for cold-rolled steel coils purchases 2

Please see **Exhibit 60-1: G-7.6-3** and **Exhibit 60-2: G-7.6-3** for the reconciliation worksheet and supporting documents of the purchases value of hot-rolled steel coils and cold-rolled steel coils to associated raw material account.

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.

**ANSWER:** As explained above, Yieh Phui purchased some of the hot-rolled steel and cold-rolled steel from its related companies during the inquiry period. The selling prices were set by Yieh Phui’s related companies by the market price.

## **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.

**ANSWER:** Please see **Exhibit 61: G-8.1** for the worksheet named “G-8 Upwards costs”.

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.

**ANSWER:** Please see Exhibit 62: G-8.2 for the supporting documents for the worksheet "G-8 Upwards costs".

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; and
  - provide the account number and sub-account number (if applicable) at column E of the worksheet.

**ANSWER:** Yieh Phui has provided the worksheet "G-8 Upwards costs" pursuant to the instruction above.

## **G-9 Production of the goods under consideration**

1. Describe your company's practices for capturing the production quantities reported at worksheets "G-3 domestic CTM" and "G-5 Australian CTM". Consider using a flowchart in answering this question.

**ANSWER:** The production quantity reported at worksheets "G-3 domestic CTM" and "G-5 Australian CTM" is the finished goods inventory-in quantity of the goods under consideration produced during the inquiry period. After the completion of packing stage, the finished goods then enter into the finished goods inventory and the quantity of each coil is recorded in Yieh Phui's "Finished goods inventory management system". The source of the finished goods inventory-in quantity is from the weight of each coil measured after the completion of zinc coating stage which is recorded in Yieh Phui's "Steel coil production system".

In the normal course of business, Yieh Phui's cost accounting system calculates and records production costs by production line, without differentiating costs between product types or the geographic markets. Therefore, the coils produced in each production line, irrespective of the geographic markets the coils sold to, have the same per unit cost to make in Yieh Phui's cost accounting system. In addition, Yieh Phui neither records the production quantity nor manages the finished goods inventory by the geographic markets. Therefore, for reporting purposes, Yieh Phui calculates the same per unit cost to make for all good with the same MCC in each quarter, irrespective of geographic markets the goods are sold to.

Therefore, in worksheets "G-3 domestic CTM" and "G-5 Australian CTM", MCCs sold in both markets in the same quarter are reported with the same production quantities and these production quantities reflect the company-wide production quantities, not ones specifically for any geographic market.

2. Outline the types of source documents kept by the company in relation to production quantities and how the production quantities are entered into the accounting system. Consider using a flowchart in answering this question.

**ANSWER:** The production quantity (finished goods inventory-in quantity) of each coil is recorded in Yieh Phui's computerized "Finished goods inventory management system". The

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source of the finished goods inventory-in quantity is from the weight of each coil measured after the completion of zinc coating stage, which is recorded in Yieh Phui's "Steel coil production management system".

3. Briefly explain the reasons for any differences between:

- (a) the production quantities reported at worksheet "G-3 domestic CTM" and the sales volumes reported at worksheet "D-2 domestic sales"; and
- (b) the production quantities reported at worksheet "G-5 Australian CTM" and the sales volumes reported at worksheet "B-2 Australian sales".

**ANSWER:** Please see the reasons described below for the difference between the CTM listing and the sales listing:

- (1) As explained above, the production quantity reported in worksheets "G-3 domestic CTM" and "G-5 Australian CTM" is the total company-wide production quantity of each MCC in each quarter, irrespective of the geographic markets, while the sales quantity reported in the worksheets "D-2 domestic sales" and "B-2 Australian sales" is limited to the sales in domestic market and to the Australian market.
- (2) There were certain coils produced during the inquiry period but not sold during the inquiry period. Those coils were still maintained in the finished goods inventory at the end of the inquiry period. Those coils are reported in the CTM listing but are not reported in sales listing.
- (3) There were certain coils sold during the inquiry period but produced before the inquiry period. Those coils are reported in the sales listing but are not reported in the CTM listing.

4. 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?

**ANSWER:** Yieh Phui has three zinc-coating lines capable of producing the goods without substantial retooling. All of these three zinc-coating lines are engaged in the production of the goods falling within the scope of this duty assessment and other goods not within the scope of this duty assessment (i.e., aluminium-zinc coated steel). In addition, the goods subject to this duty assessment that are produced by Yieh Phui are used not only for sales, but also used internally for the production of pre-painted steel, a type of goods not subject to this duty assessment. Thus, the production quantity of the goods is normally determined together with other goods that are produced by Yieh Phui. In principle, the production quantity of the goods and the product mix of production are determined mainly pursuant to orders received as long as the total production quantity of the goods and other goods is within the maximum production capability of the three zinc-coating lines. Depending on the market situation, the production schedule of the goods is determined weeks or months prior to production through the weekly production planning meetings and is subject to changes during the course from the date of orders received up to the date of production.

5. What lead times are typically needed to adjust volumes of production for the goods?

**ANSWER:** For adjustments to production volume for the goods which would involve new purchases of raw materials, it typically requires one to two months to complete. For other types of adjustments, the lead time required can be reduced to days or weeks.

## G-10 Capacity Utilisation

1. Please complete the worksheet named "G-10 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.

**ANSWER:** Please see Exhibit 63: G-10.1 for the worksheet named "Capacity Utilisation".

2. Explain how the production capacity and capacity utilisation has been calculated.

**ANSWER:** As demonstrated on page 21 of Yieh Phui's brochure provided in Exhibit A-2.11-1, the designed production capacity of four galvaizing lines is 1,000,000 metric tons per year.

3. Do you have warehousing facilities for the goods? If no, what do you do with excess inventory? If yes:
  - (a) What is the 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)?

**ANSWER:** The capacity of the finished goods warehousing is [NUMBER] metric tons, which are used for the storage of the finished goods of the goods under consideration and other products including 55% aluminum-zinc coated steel coils, 5% aluminum-zinc coated steel coils and pre-painted steel coils.

Please see Exhibit 64: G-10.3 for the monthly amount of inventory of galvanized steel coils (the goods), 55% aluminum-zinc coated steel coils, and 5% aluminum-zinc coated steel coils during the inquiry period. As explained in the answer to Section G-2.4, for cost accounting purposes, Yieh Phui calculates production-line-specific (rather than product model specific) cost of manufacturing in its normal course of business. Each zinc coating line has one unit cost of manufacturing for all three types of products being produced. Therefore, Yieh Phui has reported in Exhibit 64: G-10.3 the monthly amount of inventory of the three types of products, rather than the goods under consideration. Please also see Exhibit 64: G-10.3 for the calculation worksheet for the average period of time that inventory is retained.

4. Have there been any changes to the type of capital or technology utilised by your company in the manufacturing of the goods in the last five years? If yes, provide details.

**ANSWER:** No, there have been no changes to the type of capital or technology utilised by Yieh Phui in the manufacturing of the goods in the last five years.

5. For each plant capable of producing inputs that could be utilised to make the goods, provide the date that production facility came into operation and the production capacity of the plant over the

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past five years. The production capacity should be based on an actual production capacity, not a budgeted production capacity.

**ANSWER:** Yieh Phui is not an integrated steel manufacturer and it does not produce the inputs to make the goods. Yieh Phui purchases mainly hot-rolled steel coils, zinc ingots and occasionally cold-rolled steel coils for the production of the goods under consideration in the normal course of business.

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.

**ANSWER:** Yieh Phui did not have any significant investments in the past five years to upgrade, refurbish or build any of the plants used in the production of the goods.



## SECTION J DOMESTIC MARKET

### J-1 Prevailing conditions of competition in the domestic market

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

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

**ANSWER:** In Yieh Phui's opinion, the domestic market has been at a stable trend of growth over the past five years.

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

**ANSWER:** The sources of demand for the goods in the domestic market are predominantly from general construction purposes and from downstream manufacturers of steel pipes and tubes. By categories of customers, it is estimated that half of the demand is from end-users and the other from distributors (including coil service centers).

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

**ANSWER:** Please see the answer to question (b) above.

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

**ANSWER:** The most important factor that influences consumption/demand in the domestic market is the demand for constructions of all kinds of structures and this is highly related to the overall economic situations of the domestic market.

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

**ANSWER:** In Yieh Phui's opinion, the domestic market of the goods can generally be differentiated by applications, one for general structural purposes, and the other for manufacturing of galvanized steel pipes and tubes.

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

**ANSWER:** By applications, it is estimated that [PERCENTAGE]% of the revenue comes from general structural purposes, [PERCENTAGE]% comes from downstream manufacturing of galvanized steel pipes and tubes and the remaining from other applications.

- (g) Describe the way in which domestically produced goods and imported goods compete in the domestic market;

**ANSWER:** It is Yieh Phui's view that it is generally difficult for the imported goods to compete with the domestically produced goods due to the domestic manufacturers' advantage of providing instant delivery of the goods required by customers. To Yieh Phui's knowledge, the imported goods can probably complete with the domestically produced goods only when the selling price is sufficiently competitive, noticeably imports from Vietnam.

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

**ANSWER:** The goods are generally marketed and distributed to end users in the domestic through distributors, with some directly to the end users.

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

**ANSWER:** None.

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

2. Provide a diagram which describes the domestic 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 domestic market.

**ANSWER:** The commercially significant market participants of the goods in the domestic market include domestic manufacturers, distributors and end-users.

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

**ANSWER:** Please see Exhibit 65: J-1.3 for a list of commercially significant market participants.

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

**ANSWER:** It is unknown to Yieh Phui the identity of the commercial significant importers in the domestic market for the goods. Yieh Phui estimates that the imported goods have less than 10% of the market share in the domestic market.

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

**ANSWER:** There are no domestic laws or regulations made specifically for the goods relating to competition policy, taxation, product standards or the range of the goods.

6. Describe any entry restrictions for new participants into the domestic market for the goods. Your response could include information on:
- resource ownership;
  - patents and copyrights;
  - licenses;
  - barriers to entry;
  - import restrictions; and
  - government regulations(including the effect of those government regulations).

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

**ANSWER:** There is no entry restrictions for new participants into the domestic market for the goods.

## **J-2 Goods in the domestic market**

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

**ANSWER:** To Yieh Phui's knowledge, a full range of the like goods are offered for sale by the manufacturers in the domestic market. As the industry of the like goods is relatively a mature one, there is generally no significant difference in terms of quality, price, technical support, prevalence of labels or product segmentation between those offered for sale in the domestic market. Yieh Phui offers for sales in the domestic market the full range of the like goods.

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

**ANSWER:** The end uses of the goods in the domestic market are predominantly for general structural purposes (e.g., purlin, decking and walling), with some used for manufacturing of galvanized steel pipes and tubes.

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

**ANSWER:** From Yieh Phui's own experiences, the major factors that influences purchasing decisions include selling prices, quality of the goods and the supplier's ability to meet buyer's expectation of timeframe for delivery.

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

**ANSWER:** Aluminium-zinc coated steel is the only commercially significant market substitute for the goods in the domestic market.

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

**ANSWER:** No, Yieh Phui has not seen any changes in market or consumer preferences in the domestic market for the goods in the last five years.

### **J-3 Relationship between price and cost in the domestic market**

1. Describe the importance of the domestic 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 the domestic market; and
  - (b) The proportion of your company's profit derived from sales of the goods in the domestic market.

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

**ANSWER:** As demonstrated by Exhibit B-4.3-1 (Upward sales), approximately [PERCENTAGE]% of Yieh Phui's sales revenue is derived from sales of the goods in the domestic market. Yieh Phui estimates that approximately [PERCENTAGE]% of its profit is derived from sales of the goods in the domestic market.

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

**ANSWER:** No, Yieh Phui is not the price leader for the goods in the domestic market. In Yieh Phui's opinion, [THE PRICE LEADER AND THE REASON WHY YIEH PHUI CONSIDERS IT AS THE PRICE LEADER]

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 the domestic market. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.

**ANSWER:** In principle, Yieh Phui's product pricing is [PRICING STRATEGY AND THE MARKETING STRATEGY]

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

**ANSWER:** Please see the answer to Section D-1 above for explanations of Yieh Phui's sales process. Yieh Phui's selling prices are negotiated and determined on a transaction-

by transaction basis. In negotiating the selling prices with customers, Yieh Phui's sales representatives rely on the internal price guidance established by the company.

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

**ANSWER:** Yieh Phui's internal price guidance is generally updated on a monthly basis and the most important factor for pricing setting is the raw material price announced periodically by the upstream steel mills of steel coils.

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

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

**ANSWER:** Yieh Phui has ranked the following factors in terms of their influence on Yieh Phui's pricing decisions:

[ INFLUENCE OF THE FACTORS ON YIEH PHUI'S PRICING DECISIONS ]

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

**ANSWER:** As explained above, as Yieh Phui's pricing is based on [PRICING STRATEGY AND THE EXPLANATION OF THE STRATEGY]

8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the domestic market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.

**ANSWER:** Yes, Yieh Phui does offer price reductions through discounts of its offering prices or occasionally through post-sale rebates. However, Yieh Phui does not apply uniform criteria in determining whether and how the price reductions and post-sale rebates are offered for all customers. Thus, for a customer without a long history of large volume purchases, Yieh Phui may still offer price reductions and/or sales rebates in considering a customer's future potentials.

9. Do you offer bundled pricing in the domestic market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for the goods. Provide copies of internal documents which support your claims in response to this question.

**ANSWER:** No, Yieh Phui does not offer bundled pricing in the domestic market.

10. Does the volume of sales to a customer or the size of an order influence your selling price in the domestic market? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume based prices for the goods. Provide copies of internal documents which support your claims in response to this question.

**ANSWER:** The volume of sales to a customer or the size of an order does influence Yieh Phui's selling prices in the domestic market. In general, Yieh Phui is more willing to reduce selling prices for customers that constantly purchase the goods from Yieh Phui with large volumes. However, the level of price reductions is still subject to negotiations with the customer on a transaction-by-transaction basis.

11. Does your organisation/business entity use sales contracts in the domestic market? If yes:
- What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
  - Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
  - How frequently are sales contracts renegotiated?
  - How frequently are price reviews conducted between contracts?
  - 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.
  - Do changes in your costs to make and sell enable you to review prices for customers within contracts?
  - Provide a list of the customers under contract during the investigation period and copies of the two largest contracts in terms of sales revenue. Provide a complete translation of the documents.

**ANSWER:** No, Yieh Phui does not use sales contracts for sales of the goods in the domestic market.

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

**ANSWER:** This question is not applicable, as Yieh Phui does not use price lists for domestic sales of the goods.

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

**ANSWER:** Yieh Phui's pricing for its domestic sales of the goods is in general on a cost-plus pricing basis. Yieh Phui in general groups its products into hot-rolled galvanized steel products ("HGI") and cold-rolled galvanized steel products ("CGI"). The pricing of the two

groups of products are differentiated based on the purchase price difference of hot-rolled steel coils and cold-rolled steel coils, as well as Yieh Phui's processing costs of cold-rolling to produce the purchased hot-rolled steel coils to cold-rolled steel coils.

14. Do you tier or segment your domestic customers for the goods in terms of pricing? If yes, provide:
- a general description of how this is done;
  - list the factors that influence pricing differentiation in different tiers or segments; and
  - explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

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

**ANSWER:** No, Yieh Phui does not tier or segment its domestic customers for the goods in terms of pricing.

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

**ANSWER:** Yes, Yieh Phui sold a small amount of the goods to related companies in the domestic market during the inquiry period. The goods sold to [NAME OF RELATED CUSTOMER] during the inquiry period were all [PRODUCT DESCRIPTION] and were for its resales, while the goods sold to [YUSCO] was for its' own consumption. The prices for sales to related companies are set the same way as Yieh Phui's sales to unrelated customers. During the inquiry period, the sales revenue of the goods sold to related companies account for [PERCENTAGE]% of Yieh Phui's total revenue of the domestic sales of the like goods during the inquiry period.

#### **J-4 Marketing and sales support in the domestic market**

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

**ANSWER:** Having been engaged in the business of the goods in Taiwan for decades, Yieh Phui is already well-known in the industry. For marketing purposes, Yieh Phui has been participating in various trade shows in Taiwan to promote/introduce its products to downstream customers. In addition, Yieh Phui has managed to appear in social media and professional periodicals to enhance its visibility in the industry.

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

**ANSWER:** No, Yieh Phui does not conduct brand segmentation in the domestic market for the goods.

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

**ANSWER:** In recent years, Yieh Phui started to use social media in promoting its business by sharing with the general public the various business events it has participated in or held. Yieh Phui has also advertised its products in general on professional periodicals to enhance its visibility in the industry. In Exhibit 66: J-4.3, please see a sample page of Yieh Phui's advertisement in a local periodical named "Architecture World".

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

**ANSWER:** There are in total [NUMBER] sales representatives in Yieh Phui's domestic market sales team for zinc-coated steel (including the goods subject to this continuation inquiry and aluminium-zinc coated steel) and they work from Yieh Phui's headquarters in Kaohsiung, Taiwan.

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

**ANSWER:** In order to assist its sales representatives in offering and negotiating selling prices for the goods with customers, Yieh Phui sets its internal price guidance for the sales representatives to rely on as the minimum selling price on a monthly basis.



## 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;

**ANSWER:** From Yieh Phui's perspective, the Australian market for the goods remains the same over the past five years. The only noticeable change is the rising imports of the goods from Vietnam to Australia in recent years.

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

**ANSWER:** From Yieh Phui's perspective, the sources of demand for the goods in Australian are entirely from traders, which in turn distribute the goods in the Australian market for general structural purposes.

In terms of applications, Yieh Phui estimates [PERCENTAGE BY APPLICATION AND THE DESCRIPTION FOR EACH APPLICATION]

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

**ANSWER:** Please see the answer to question (b) above.

- (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;

**ANSWER:** In terms of the goods in Australia, the most important factor that influences consumption/demand is the economic condition of the construction industry.

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

**ANSWER:** From Yieh Phui's perspective, there is a geographic segmentation in the Australian market that can be divided into four regions: north, south, east and west.

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

**ANSWER:** In general, Yieh Phui estimates that approximately [PERCENTAGE OF THE AUSTRALIAN SALES BY MARKET SEGMENTS].

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

**ANSWER:** The Australian manufactured goods compete with imported goods mainly based on the locality advantage which allows the Australian manufacturers to provide more

instant delivery of a wider range of the goods, except for the goods with high coating mass which is under-supplied locally in Australia.

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

**ANSWER:** To Yieh Phui's knowledge, the goods (either locally produced or imported) are marketed and distributed in the Australian market mainly through regional distributors (including service centers).

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

**ANSWER:** From Yieh Phui's perspective, there is no other major factor that is relevant to characteristics or influences on the market for the goods in Australia.

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

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

**ANSWER:** The major market participants in the Australian market include manufacturers, distributors, importers and end-users.

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

**ANSWER:** Please see below for the requested information:

(1) Sole Manufacturer in Australia: Bluescope (market share at least 70%)

(2) Importers: [NAME OF THE AUSTRALIAN IMPORTERS]

(3) Distributors (including service centers and stockists): [NAME OF THE AUSTRALIAN DISTRIBUTORS]

(4) Endusers: [NAME OF AUSTRALIAN ENDUSERS]

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

**ANSWER:** Please see the answer to question 3 above for the requested information. Yieh Phui is unaware of the market share of each importer.

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

**ANSWER:** To Yieh Phui's knowledge, there are no laws or rules in Australian that specifically regulate 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).

**ANSWER:** To Yieh Phui's knowledge, there is no entry restriction for new participants into the 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.

**ANSWER:** To Yieh Phui's knowledge, a full range of the goods is offered for sale by the Australian manufacturer in the Australian market. However, the goods with [PRODUCT DESCRIPTION OF THE UNDER-SUPPLIED PRODUCTS] in the Australian market.

Yieh Phui also offers a full range of the goods for its Australian customer, but in practice, the majority of the goods sold by Yieh Phui to Australia have been the goods with [PRODUCT DESCRIPTION OF THE UNDER-SUPPLIED PRODUCTS].

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

**ANSWER:** The goods in the Australian market are for general structural purposes such as purlin and decking and other purposes such as for the making of culvert, water tank and spiral duct etc.

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

**ANSWER:** From Yieh Phui's perspective, the key attributes that influence purchasing decisions or preferences in the Australian market include brand name, prices and quality.

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

**ANSWER:** The only commercially significant market substitute in the Australian market for the goods is aluminium-zinc coated steel.

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

**ANSWER:** None.

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

**ANSWER:** There has not been any noticeable change in market or consumer preferences in the 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
  - (b) The proportion of your company's profit derived from sales of the goods in Australia.

**ANSWER:** As demonstrated by Exhibit B-4.3-1 (Upward sales), approximately [PERCENTAGE]% of Yieh Phui's sales revenue is derived from its sales of the goods to the Australian market. Yieh Phui estimates that approximately [PERCENTAGE]% of its profit is derived from sales of the goods in the Australian market.

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

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

**ANSWER:** No, Yieh Phui is not the price leader for the goods in the Australian market. Yieh Phui considers the Australian manufacturer, BlueScope, the price leader for the goods in the Australian market because BlueScope has the largest market share for the goods and has the dominant position in the Australian market.

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

**ANSWER:** Yieh Phui's pricing for its sales of the goods to Australia is in general a cost-plus pricing based on its internal price guidance. The prices set in Yieh Phui's internal price guidance take into consideration of various economic factors, including cost of production and market conditions. The final selling prices for the goods sold to Australia are determined transaction-by-transaction based on Yieh Phui's negotiations with its customer considering sales volume, product mix and market conditions, etc.

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

**ANSWER:** The selling prices of the goods for the Australian market are determined through Yieh Phui's negotiations with its customers on a transaction-by-transaction basis. In determining the offering prices, Yieh Phui's sales representatives rely on the prices set in Yieh Phui's internal price guidance, in which minimum selling prices are established by the sales department. Please see Exhibit 67: K-3.4 for a copy of Yieh Phui's internal price guidance for export sales.

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

**ANSWER:** Yieh Phui's internal price guidance is generally determined on a monthly basis by its sales managers.

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

**ANSWER:** Please see the following for the ranked factors that influence Yieh Phui's pricing decisions:

[

**RANKED FACTORS**

]

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

**ANSWER:** In general, Yieh Phui uses a cost-plus pricing strategy. Thus, Yieh Phui manages to make desired profits from its sales of the goods to Australia. The desired profit, however, varies from time to time due to market conditions.

8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Australian market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.

**ANSWER:** Yieh Phui does not offer post-sale (e.g., sales rebates) price reductions for its exports of the goods to Australia. The selling price is negotiated and determined on a transaction-by-transaction basis. Price reductions may be made during the course of price negotiations due to various reasons, such as the underlying size and product mix of an order being negotiated.

9. Do you offer bundled pricing in the Australian market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for the goods. Provide copies of internal documents which support your claims in response to this question.

**ANSWER:** No, Yieh Phui does not offer bundled pricing in the Australian market.

10. Does the volume of sales to a customer or the size of an order influence the selling price? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume based prices for the goods. Provide copies of internal documents which support your claims in response to this question.

**ANSWER:** Yes, the volume of sales to a customer and the size of an order both influence the selling price. However, there is no uniform criterion applied by Yieh Phui in negotiating the selling price with its customers. In general, Yieh Phui is more willing to provide price reductions to its offering prices when the market the demand is weak, but Yieh Phui generally maintains its selling prices above the minimum selling price set in its internal price guidance.

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?

**ANSWER:** Yieh Phui uses written sales contracts for all of its Australian sales. The sales contract is entered into by Yieh Phui and its Australian customer on a transaction-by-transaction basis.

- (b) Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?

**ANSWER:** No, Yieh Phui has never offered exclusivity contracts for its sales of the goods to Australia.

- (c) How frequently are sales contracts renegotiated?

**ANSWER:** Yieh Phui's sales contracts with its Australian customer are made on a transaction-by-transaction basis.

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

**ANSWER:** The selling prices agreed upon by Yieh Phui and its Australian customer in the sales contract are generally not subject to changes, unless both parties agree.

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

**ANSWER:** No, Yieh Phui generally does not provide opportunities for price reviews for customers within contracts.

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

**ANSWER:** No, changes in Yieh Phui's costs to make and sell generally do not enable Yieh Phui to review prices for customers within contracts.

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

**ANSWER:** All of Yieh Phui's Australian sales of the goods during the inquiry period are under contracts. The sample sales contracts are provided in the sample Australian sales document under Section B of this questionnaire response.

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

**ANSWER:** This question is not applicable, as Yieh Phui does not use any price lists for its sales of the goods to Australia. Yieh Phui's price quotations to its Australian customer are provided on a transaction-by-transaction basis by its sales representative relying on Yieh Phui's internal price guidance. Yieh Phui's internal price guidance is not disclosed to the public or any of its Australian customers.

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

**ANSWER:** Yieh Phui differentiates pricing for the goods by major product characteristics including coating mass and product dimensions (e.g., thickness and width).

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;

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- (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.

**ANSWER:** No, Yieh Phui does not tier or segment its Australian customers for the goods in terms of pricing.

*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.

**ANSWER:** No, Yieh Phui does not sell the goods to any related entity in Australia.

#### **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.).

**ANSWER:** Yieh Phui markets the goods in the Australian market mainly based on its brand name (as a long-established reliable manufacturer of the goods), competitive price, quality and availability of wide size ranges.

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

**ANSWER:** No, Yieh Phui does not conduct brand segmentation in the Australian market for the goods.

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

**ANSWER:** Yieh Phui has not conducted any advertising activities for its goods in the Australian market over the past five years.

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

**ANSWER:** Yieh Phui's Australian sales are handled by its East Asia & Oceania Section of its export sales department. There are in total [NUMBER] employees in this section, and other than the Australian market, this section also covers other geographic markets such as Oceanic, Japan, Korea and Hong Kong.

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.



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**ANSWER:** Other than the internal price guidance, there are no other parameters provided to sales staff to assist in establishing pricing for the goods when negotiating sales with customers.

## EXPORTER'S DECLARATION

### EXPORTER'S DECLARATION

I hereby declare that Yieh Phui Enterprise Co., Ltd. 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 :** Gary Wen-Chung Tien

**Signature :** 

**Position in**

**Company:** Sr. Assistant Vice President, General Accounting & Investing

**Date :** September 28, 2022

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**List of Exhibits**

**Section A**

- Exhibit 1: A-2.5-1 Cross shareholding between E United Group members**
- Exhibit 2: A-2.5-2 Yieh Phui's affiliates**
- Exhibit 3: A-2.6 Yieh Phui top 10 largest shareholders**
- Exhibit 4: A-2.9 Yieh Phui internal organization chart**
- Exhibit 5: A-2.11-1 Yieh Phui company brochure**
- Exhibit 6: A-2.11-2 E United Group brochure**
- Exhibit 7: A-4.1-1 Yieh Phui 2020 annual report**
- Exhibit 8: A-4.1-2 Yieh Phui 2021 annual report**
- Exhibit 9: A-4.1-3 Yieh Phui audited financial statements of 2020 (consolidated)**
- Exhibit 10: A-4.1-4 Yieh Phui audited financial statements of 2021 (consolidated)**
- Exhibit 11: A-4.1-5 Yieh Phui audited financial statements of 2020 (unconsolidated)**
- Exhibit 12: A-4.1-6 Yieh Phui audited financial statements of 2021 (unconsolidated)**
- Exhibit 13: A-4.1-7 [NAME OF RELATED RAW MATERIAL SUPPLIER] audited financial statements of 2020**
- Exhibit 14: A-4.1-8 [NAME OF RELATED RAW MATERIAL SUPPLIER] audited financial statements of 2021**
- Exhibit 15: A-4.1-9 [NAME OF RELATED RAW MATERIAL SUPPLIER] audited financial statements of 2020**
- Exhibit 16: A-4.1-10 [NAME OF RELATED RAW MATERIAL SUPPLIER] audited financial statements of 2021**
- Exhibit 17: A-4.1-11 [NAME OF RELATED RAW MATERIAL SUPPLIER] audited financial statements of 2020**
- Exhibit 18: A-4.1-12 [NAME OF RELATED RAW MATERIAL SUPPLIER] audited financial statements of 2021**
- Exhibit 19: A-4.1-13 [NAME OF RELATED CUSTOMER] audited financial statements of 2020**
- Exhibit 20: A-4.1-14 [NAME OF RELATED CUSTOMER] audited financial statements of 2021**
- Exhibit 21: A-4.1-15 [NAME OF RELATED SERVICE PROVIDER] audited financial statements of 2020**
- Exhibit 22: A-4.1-16 [NAME OF RELATED SERVICE PROVIDER] audited financial statements of 2021**
- Exhibit 23: A-4.4 Yieh Phui income statements**
- Exhibit 24: A-4.5 Yieh Phui trial balance**
- Exhibit 25: A-4.6 Yieh Phui chart of accounts**

**Section B**

## **PUBLIC RECORD**

- Exhibit 26: B-2.1 "B-2 Australian sales"**
- Exhibit 27: B-2.2 "B-2.2 Australian sales source "**
- Exhibit 28-1: B-3.2-1 Sample Australian sales documents – 1 – Sales documents**
- Exhibit 28-2: B-3.2-1 Sample Australian sales documents – 1 – Selling expenses documents -1**
- Exhibit 28-3: B-3.2-1 Sample Australian sales documents – 1 – Selling expenses documents -2**
- Exhibit 28-4: B-3.2-1 Sample Australian sales documents – 1 – Selling expenses allocation worksheet**
- Exhibit 29-1: B-3.2-2 Sample Australian sales documents – 2 – Sales documents**
- Exhibit 29-2: B-3.2-2 Sample Australian sales documents – 2 – Selling expenses documents -1**
- Exhibit 29-3: B-3.2-2 Sample Australian sales documents – 2 – Selling expenses documents -2**
- Exhibit 29-4: B-3.2-2 Sample Australian sales documents – 2 – Selling expenses allocation worksheet**
- Exhibit 30: B-4.3-1 "B-4 Upwards sales"**
- Exhibit 31: B-4.3-2 Documents supporting "B-4 Upwards sales"**
- Exhibit 32: B-5.3-1 "B-5 Upwards selling expense"**
- Exhibit 33: B-5.3-2 Documents supporting "B-5 Upwards selling expense"**

### **Section C**

- Exhibit 34: C-3.1-1 Yieh Phui 3-digit product category code**
- Exhibit 35: C-3.1-2 MCCs coding data source**
- Exhibit 36: C-3.3-3 MCC coding supporting documents**

### **Section D**

- Exhibit 37: D-2.2-1 "D-2 Domestic Sales"**
- Exhibit 38: D-2.2-2 "D-2.2 domestic sales source "**
- Exhibit 39: D-3.2-1 Domestic sales documents – Sample 1**
- Exhibit 40: D-3.2-2 Domestic sales documents – Sample 2**

### **Section E**

- Exhibit 41: E-2.3 Packaging costs calculation worksheet**

### **Section F**

**PUBLIC RECORD**

- Exhibit 42: F-2.2-1 "F-2 Third country sales"
- Exhibit 43: F-2.2-2 "F-2.2 third country sale source"

**Section G**

- Exhibit 44: G-1.1 Scrap and by-products generated from the production process of the goods
- Exhibit 45: G-2.3 Cost centers
- Exhibit 46: G-3.1-1 "G-3 Domestic CTM"
- Exhibit 47: G-3.1-2 "G-3 All CTM"
- Exhibit 48: G-3.2 "G-3.2 Domestic CTM source"
- Exhibit 49: G-4.2-1 "G-4.1 SG&A listing"
- Exhibit 50: G-4.2-2 "G-4.2 Domestic SG&A calculation"
- Exhibit 51: G-5.1 "G-5 Australian CTM"
- Exhibit 52: G-5.2 "G-5.2 Australian CTM source"
- Exhibit 53: G-6.1 COGS adjustment ratio calculation worksheet
- Exhibit 54-1: G-6.2 CTM calculation worksheets summary
- Exhibit 54-2: G-6.2-1 CTM calculation worksheets – 2021Q2
- Exhibit 54-3: G-6.2-2 CTM calculation worksheets – 2021Q3
- Exhibit 54-4: G-6.2-3 CTM calculation worksheets – 2021Q4
- Exhibit 54-5: G-6.2-4 CTM calculation worksheets – 2022Q1
- Exhibit 55: G-7.2 "G-7.2 Raw material CTM" listing
- Exhibit 56: G-7.4 "G-7.4 Raw material purchases" listing
- Exhibit 57: G-7.5 Data source for "G-7.4 Raw material purchases" listing
- Exhibit 58-1: G-7.6-1 Supporting documents for hot-rolled coils purchases – 1
- Exhibit 58-2: G-7.6-1 Supporting documents for hot-rolled coils purchases – 2
- Exhibit 59-1: G-7.6-2 Supporting documents for cold-rolled coils purchases – 1
- Exhibit 59-2: G-7.6-2 Supporting documents for cold-rolled coils purchases – 2
- Exhibit 60-1: G-7.6-3 RM reconciliation - Purchases summary
- Exhibit 60-2: G-7.6-3 RM reconciliation - Sample general ledger
- Exhibit 61: G-8.1 "G-8 Upwards costs"
- Exhibit 62: G-8.2 Supporting documents of "G-8 Upwards costs"
- Exhibit 63: G-10.1 "Capacity Utilisation"
- Exhibit 64: G-10.3 Inventory turnover calculation worksheet

**Section J**

- Exhibit 65: J-1.3 List of commercially significant market participants
- Exhibit 66: J-4.3 Yieh Phui's advertisement

**Section K**

**Exhibit 67: K-3.4 Price guidance**