

30 September 2026

To Whom It May Concern,

RE: LETTER OF SUPPORT – BROAD WINDOWS | ANTI-DUMPING MATTER

ABS Facade is pleased to provide this letter in support of Broad Windows in relation to the current anti-dumping matter and the potential imposition of significant additional duties on products manufactured and supplied by Broad Windows from China into Australia.

ABS Facade is a specialist façade contractor operating throughout Australia, delivering complex façade packages across major commercial, residential, health, defence and government infrastructure projects. ABS Facade also maintains significant Australian-based fabrication capability, with more than 10,000m² of manufacturing facilities under roof across Australia.

Broad Windows is an important manufacturing partner to ABS Facade, supplying aluminium windows and doors within the scope of this investigation, often as part of broader façade packages incorporating curtain wall systems. Any duties imposed on these products would increase overall façade package costs and affect not only ABS Facade, but the broader Australian network of builders, developers, subcontractors, consultants, logistics providers and installation teams involved in delivering major projects nationwide.

ABS Facade remains strongly committed to Australian manufacturing and continues to fabricate substantial volumes of façade products locally. Our use of Broad Windows is not a replacement for this capability. Rather, certain projects require additional manufacturing capacity due to their scale, complexity and programme requirements. Broad provides this supplementary capacity, allowing ABS Facade to undertake larger and more complex projects while continuing to maintain, invest in and utilise our Australian manufacturing operations.

This combined manufacturing model has assisted ABS Facade in successfully delivering a significant number of major projects throughout Australia, including critical State and Federal Government infrastructure. Broad's manufacturing capability has contributed to projects across public hospitals and healthcare facilities, State and Federal Government offices and departments, defence facilities, correctional centres and prisons, as well as other major public infrastructure.

Many of these projects are essential assets for Australian communities and government agencies. Access to additional manufacturing capacity has been important in allowing ABS

Facade to meet demanding construction programmes, technical specifications, quality requirements and project milestones.

Importantly, offshore fabrication represents only one component of the overall delivery of these façade packages. Significant Australian economic activity remains across local fabrication, project management, façade design, engineering, procurement, logistics, transport, site supervision, installation and construction. These projects support Australian employees, subcontractors, consultants, suppliers and other businesses throughout the construction supply chain.

The imposition of substantial additional anti-dumping duties on Broad Windows would therefore have consequences extending beyond the manufacturer itself. It would increase the cost of façade packages delivered by Australian contractors, potentially restrict access to necessary manufacturing capacity and place further pressure on the cost and programme of major construction projects.

In the case of hospitals, defence facilities, correctional facilities, government departments and other publicly funded infrastructure, these additional costs may ultimately flow through to State and Federal Government project budgets and Australian taxpayers.

Broad Windows has demonstrated throughout its relationship with ABS Facade that it is a capable, reliable and quality-focused manufacturing partner. Our continued engagement with Broad is based on its manufacturing capacity, technical capability, quality, reliability and ability to meet the requirements of complex Australian façade projects, rather than simply obtaining the lowest available price. In some instances, we have engaged Broad Windows where additional manufacturing capacity was required to meet the scale, programme or specific technical requirements of a project that could not be fully accommodated through our local manufacturing capacity alone.

ABS Facade supports a fair and competitive Australian market and recognises the purpose and importance of Australia's anti-dumping framework. However, we believe consideration should also be given to the practical realities of the current Australian façade industry and the role supplementary international manufacturing capacity now plays within it.

In this regard, we consider it relevant that the industry has evolved significantly since earlier anti-dumping submissions were made. We have reviewed previous submissions and representations from industry participants, including suppliers and manufacturers that historically advocated for restrictions on imported façade products and greater protection of Australian manufacturing.

We understand that some of those same industry participants have since established, acquired or utilised manufacturing facilities or supply arrangements in China and now import products into Australia as part of their own operations.

We do not raise this to criticise those businesses. Rather, it demonstrates how the industry has evolved and reinforces the commercial reality that international manufacturing capacity has become an established part of the Australian façade supply chain. The fact that businesses which previously opposed imported manufacturing have subsequently adopted similar international supply models is, in our view, relevant when considering current industry practice and the appropriate application of anti-dumping measures.

ABS Facade's own operations demonstrate that Australian and international manufacturing do not need to be mutually exclusive. We have invested substantially in Australian fabrication capability while using Broad Windows to provide additional capacity where required. This model allows us to remain competitive, employ and engage Australian workers and businesses, and deliver major projects that may otherwise place excessive pressure on available local production capacity.

For these reasons, ABS Facade supports Broad Windows' position in this matter and respectfully requests that any determination consider Broad's individual circumstances, its established relationships with Australian businesses, current industry manufacturing practices and the broader downstream consequences of imposing substantial additional duties.

Any measures imposed should, in our view, achieve the intended purpose of Australia's anti-dumping framework without creating unintended consequences for Australian contractors, workers, construction costs and the delivery of critical State and Federal Government infrastructure.

Should further information regarding ABS Facade's Australian manufacturing operations, our experience with Broad Windows or the projects supported by Broad's manufacturing capability be required, we would be pleased to provide it.

Regards,



Sasha Mielczarek

Director of Operations | ABS Façade Pty Ltd