Australian Government
Department of Industry, Science and Resources

Anti-Dumping Commission

Exporter Questionnaire

Case number: 717

Product: Certain Hollow Structural Sections

From: The People's Republic of China

Inquiry period: 1 July 2025 – 30 June 2026 (the period)

Response due by: 2 October 2026

Email enquiries to: investigations@adcommission.gov.au

Anti-Dumping Commission website: 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.

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INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the commission) is conducting an accelerated review into certain Hollow Structural Sections (HSS; the goods) exported to Australia from the People's Republic of China (China).

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 certain HSS from the subject exporting markets has been dumped. The commission will also use this information to determine whether certain HSS from China has been in receipt of countervailable subsidies over the period.

The Commission will collect and use information in accordance with its 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 and a subsidy margin having regard to all relevant information.

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

Extension requests

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

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

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

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

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

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.

Please be aware that, if at any stage during this inquiry you become aware that you have inadvertently received confidential information submitted by another party, you have a responsibility to:

- Notify the commission
- Delete the information from your system and
- Refrain from using, sharing or retaining the information in any way.

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 questionnaire. 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 visiting your company to conduct on onsite verification. Any onsite verification 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 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 visit.

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 and subsidy margin. The commission considers that the dumping margin and subsidy margins are 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 commission 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.

Exporters are required to complete:

- all sections (ie Sections A-K).
- Exporter's declaration
- Non-confidential version of this response.

Section	Please tick if you have responded to all questions
Section A Company information	☐
Section B Export sales to Australia	☐
Section C Exported goods & like goods	☐
Section D Domestic sales	☐
Section E Due allowance	☐
Section F Third country sales	☐
Section G Cost to make and sell	☐
Section H Particular market situation	☐
Section I Countervailing	☐
Section J Domestic Market	☐
Section K Australian Market	☐
Exporter's declaration	☐
Non-confidential version of this response	☐

Attachments	Please tick if you have provided spreadsheet
B-2 Australian sales	☐
B-2.2 Australian sales source	☐
B-4 Upwards sales	☐
D-2 Domestic sales	☐
D-2.2 domestic sales source	☐
F-2 Third country sales	☐
F-2.2 third country sale source	☐
G-3 Domestic CTM	☐
G-3.2 domestic CTM source	☐
G-4.1 SG&A listing	☐
G-4.2 Dom SG&A calculation	☐
G-4.3 Upwards SG&A	☐
G-5 Australian CTM	☐
G-5.2 Australian CTM source	☐
G-7.2 Raw material CTM	☐
G-7.4 Raw material purchases	☐
G-8 Upwards costs	☐
I-1 Company Turnover	☐
I-2 Raw Material Purchases	☐
I-3 Income Tax	☐
I-4 Grants	☐
I-5 Preferential Loans	☐

GOODS SUBJECT TO ANTI-DUMPING MEASURES

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

Notice under section 269TG(2)

Certain hollow structural sections (the goods) classified to tariff subheadings 7306.30.00 (statistical codes 31, 32, 33, 34, 35, 36 and 37), 7306.61.00 (statistical codes 21, 22 and 25) and 7306.69.00 (statistical code 10) in Schedule 3 of the Customs Tariff Act 1995.

and

Certain hollow structural sections (the goods) classified to tariff subheadings 7306.50.00 (statistical code 45) and 7306.61.00 (statistical code 90) exported from:

- *China by Dalian Steelforce Hi-Tech Co.*
- *China by Tianjin Friend Steel Pipe Co., Ltd*
- *China by Tianjin Ruitong Iron and Steel Co., Ltd*
- *China by Roswell SA R L Limited*
- *Malaysia by Alpine Pipe Manufacturing SDN BHD.*

and

Certain electric resistance welded pipe and tube made of carbon or other alloy steel classified to tariff subheading 7308.90.00 (statistical code 65), comprising circular and non-circular hollow structural sections (HSS), including circular or oval hollow sections (CHS) with other than plain ends, such as threaded, swaged and shouldered, and any sections with holes (including those created by drilling, punching, piercing, cutting or otherwise) at the end of the section or along its length (or both).

Notice under section 269TJ(2)

Certain hollow structural sections (the goods) classified to tariff subheadings 7306.30.00 (statistical codes 31, 32, 33, 34, 35, 36 and 37), 7306.61.00 (statistical codes 21, 22 and 25) and 7306.69.00 (statistical code 10) in Schedule 3 of the Customs Tariff Act 1995.

and

Certain hollow structural sections (the goods) classified to tariff subheadings 7306.50.00 (statistical code 45) and 7306.61.00 (statistical code 90) exported from:

- *China by Dalian Steelforce Hi-Tech Co.;*
- *China by Tianjin Friend Steel Pipe Co., Ltd;*
- *China by Tianjin Ruitong Iron and Steel Co., Ltd;*
- *China by Roswell SA R L Limited.*

and

Certain electric resistance welded pipe and tube made of carbon or other alloy steel classified to tariff subheading 7308.90.00 (statistical code 65), comprising circular and non-circular hollow structural sections (HSS), including circular or oval hollow sections (CHS) with other than plain ends, such as threaded, swaged and shouldered, and any sections with holes (including those created by drilling, punching, piercing, cutting or otherwise) at the end of the section or along its length (or both).

Tariff Subheading	Statistical Code	Description
7306	OTHER TUBES, PIPES AND HOLLOW PROFILES (FOR EXAMPLE, OPEN SEAM OR WELDED, RIVETED OR SIMILARLY CLOSED), OF IRON OR STEEL	
7306.30.00	Other, welded, or circular cross-section, of iron or non-alloy steel.	
	Exceeding 21 mm but not exceeding 60.3 mm external diameter:	
	31	Wall thickness not exceeding 25 mm
	32	Wall thickness exceeding 2.5 mm but not exceeding 3.6 mm
	33	Wall thickness exceeding 3.6 mm
	Exceeding 60.3 mm but not exceeding 114.3 mm external diameter:	
	34	Wall thickness not exceeding 3.2 mm
	35	Wall thickness exceeding 3.2 mm but not exceeding 4.5 mm
	36	Wall thickness exceeding 5.4 mm
	37	Exceeding 114.3 but not exceeding 165.1 mm external diameter
7306.50.00*	45*	Other, welded, or circular cross-section, of other alloy steel
7306.61.00*	Of square or rectangular cross-section of iron or non-alloy steel	
	Not exceeding 279.4 mm perimeter:	
	21	Wall thickness not exceeding 2 mm
	22	Wall thickness exceeding 2 mm
	25	Exceeding 279.4 mm
	90*	Other
7306.69.00	10	Of other non-circular cross-section
7308	STRUCTURES (EXCLUDING PREFABRICATED BUILDINGS OF 9406) AND PARTS OF STRUCTURES (FOR EXAMPLE, BRIDGES AND BRIDGE-SECTIONS, LOCK-GATES, TOWERS, LATTICE MASTS, ROOFS, ROOFING FRAMEWORKS, DOORS AND WINDOWS AND THEIR FRAMES AND THRESHOLDS FOR DOORS, SHUTTERS, BALUSTRADES, PILLARS AND COLUMNS), OF IRON OR STEEL; PLATES, RODS, ANGLES, SHAPES, SECTIONS, TUBES AND THE LIKE, PREPARED FOR USE IN STRUCTURES, OF IRON OR STEEL	
7308.90.00	65	Other

Table 1: General tariff classification for the goods

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	**Prime**	Prime	P	Mandatory	Not applicable
		Non-prime/downgrade	N		
2	**Galvanising**	Galvanised - HDG	HDG	Mandatory	Mandatory
		Galvanised – Inline	PG		
		None (eg mill finish, 'black')	N		
3	**Finish**	Oiled	O	Mandatory	Mandatory
		Painted	P		
		Coating other than oil or paint	R		
		No coating	N		
4	**Shape**	Circular	C	Mandatory	Mandatory
		Rectangular or square	R		
		Oval	O		
		Other	T		
5	**Steel grades – nominal minimum yield strength**	Steel grade with nominal minimum yield strength less than or equal to 300 MPa	250	Mandatory	Mandatory
		Steel grade with nominal minimum yield strength greater than 300 MPa but less than 380 MPa	350		
		Steel grade with nominal minimum yield strength equal to or greater than 380 MPa	450		
		Steel grade with no nominal yield strength	N		
6	**Ends**	Plain	P	Mandatory	Optional
		Threaded (at one or both ends)	T		
		Threaded and coupled	C		
		Swaged at one end and plain at the other, with holes at each end	S		
		(other than Identifier "S") Holes at one or both ends and/or along the length	H		

In constructing a MCC, use a "-" between each category. For example: P-G-N-C-350-T

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 [redacted]son within your company:
   Name: [redacted]
   Positio [redacted]ccount manager
   Telephone: [redacted]
   E-mail addr [redacted]

2. If you have appoin [redacted]e, provide their contact details:
   Name: [redacted]
   Addre [redacted]
   Telepho [redacted]
   E-mail addr [redacted]

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

3. Please provide the location where your company's financial records are held.
A: [redacted]JIANGSU ZHENJIANG NEW ENERGY EQUIPMENT CO., LTD

4. Please provide the location where your company's production records are held.
A: [redacted]

5. Please provide the location of your company's production plant manufacturing the goods under consideration.
[redacted]

A-2 Company information

1. What is the legal name of your business?
   A: JIANGSU ZHENJIANG NEW ENERGY EQUIPMENT CO., LTD

2. Does your company trade under a different name and/or brand? If yes, provide details.
   A:No

3. Was your company ever known by a different legal and/or trading name? If yes, provide details
   A:No

4. Provide a list of [redacted]ent board of [redacted] anges in the last two years.
   members: [redacted](C [redacted] [redacted](Employee Representative Director), [redacted] [redacted](Independ r), [redacted] tor).There have been no changes in t st s.

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
   A: Pls see document of [A-2-5 Information of Subsidiaries]

6. Is your company or parent company publicly listed? A: Yes
   If yes, please provide:
   (c) The stock exchange where it is listed and A:Shanghai Stock Exchange, stock code: 603507

(d) Any principal shareholders[1] A: As of March 31, 2026, the top ten shareholders are as follows, for the details, pls check document [A-2-6-(d) Shareholder Information]

If no, please provide:

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

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.

A: The company's main business includes wind power equipment, solar photovoltaic components. We sell to worldwide market, mainly focus on Europe as well as the South African, North America, South America, Latin America market and Chinese local market.

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 A: pls see below or check document [A-2-8(a) the name and address of subcontract processors] for details.
(b) sell in the domestic market
(c) export to Australia and
(d) export to countries other than Australia.

9. Provide your company's internal organisation chart. A: pls see [A-2-9 Organizational Structure]

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

Production Business Departments:

Small Components Division: Responsible for the entire process of production, delivery, and business coordination of small wind power component products.
Solar Energy Division: Focuses on the research and development, production, market expansion, and project implementation of photovoltaic support structures.
Assembly Division: Leads the assembly and integration testing processes, ensuring the quality and delivery efficiency of finished products.
Cutting Division: Responsible for the cutting and material processing of raw materials, providing qualified semi-finished products for subsequent production processes.
Production Department: Coordinates daily production scheduling, arranges production operation plans, and ensures balanced and efficient production across the entire factory.
Technical Department: Develops production process standards and operation instructions, supervises the implementation of process discipline, and promotes new processes and technologies.
Tooling Department: Designs, manufactures, and maintains the fixtures, molds, and specialized tools required for production, ensuring the adaptability of production tools.
Equipment Infrastructure Department: Manages the operation, maintenance, and technological transformation of all factory equipment, as well as the overall coordination of factory infrastructure projects.

Technical and Quality Departments:

Automation Information Department: Promotes the upgrading of production automation and the establishment of digital systems, connecting the information flow links in production processes.
Information Department: Is responsible for the operation and maintenance of internal enterprise information systems and data management, ensuring the stable operation of office and business systems.
Quality Inspection Department: Controls the quality throughout the entire process, conducts raw material inspections, process inspections, and final product inspections, and coordinates quality improvement work.

Supply Chain Departments:

Procurement Department: Coordinates the formulation of production materials and office materials procurement plans, manages suppliers, and controls costs.
Business Department: Connects with customer needs, conducts bidding, negotiates contracts, and implements business terms, maintaining customer relationships.
Outsourcing Department: Manages external collaboration manufacturers, follows up on external processing business, controls quality, and coordinates delivery coordination.
Logistics Department: Responsible for the storage scheduling and intra-factory and external transportation of raw materials, semi-finished products, and finished products, ensuring smooth material circulation.

[1] Principal shareholders are those who are able to cast, or control the casting of, [redacted] or more of the maximum amount of votes that could be cast at a general meeting of your comp

Raw Materials Warehouse: Specifically controls the inbound, storage, outbound, and inventory ledger management of production raw materials.
Functional Management Departments:
Securities Management Department: Coordinates enterprise securities-related affairs, connects with the capital market, complies with disclosure requirements, maintains investor relations, and manages securities-related risks.
Finance Department: Manages funds, conducts accounting, controls costs, and prepares financial settlements, providing financial data support for business decisions.
Cost Calculation Department: Focuses on cost accounting and expense collection for production and projects, precisely controlling various operating cost data.
Human Resources Department: Coordinates personnel recruitment, training, performance evaluation, salary management, and employee relationship maintenance.
Security Department: Responsible for factory security, fire safety, and maintenance of production order, ensuring the safety of personnel and factory property.
Internal Audit Department: Independently audits the compliance of enterprise finances and business processes, identifies internal control loopholes and business risks.
ESG Department: Coordinates environmental, social, and corporate governance-related work, promotes sustainable development and compliance disclosure of the enterprise.
System Office: Builds and maintains various enterprise management systems (such as ISO quality system), promotes system implementation and compliance audits.
Lean Office: Promotes lean production management, eliminates production waste, optimizes processes, and continuously improves enterprise operational efficiency.

11. Does your company produce brochures, pamphlets or other promotional material? If yes, please provide them. A: Yes, pls see [A-2-11 brochures for solar product] and [A-2-11 brochures for wind product]

A-3 General accounting information

1. What is your financial accounting period? A: January 1st to December 31st of the solar calendar

2. Are your financial accounts audited? If yes, who is the auditor? A: Yes. Beijing Dehao International Accounting Firm (Special General Partnership)

3. What currency are your accounts kept in? A: RMB

4. What is the name of your financial accounting system? A[redacted]

5. What is the name of your sales system? A:[redacted]

6. What is the name of your production system? A:[redacted]

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. A:[redacted] [redacted] have port integration connection. They are electronically

8. Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If yes, please provide details. A: Our accounting practices are same as the generally accepted accounting principles in China

9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details. A: There has no change

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.

A: pls see the document [A-4-1, A-4-2 Financial statements] in file [A-4]

2. If the financial statements in A-4.1 are audited, provide a copy of the audit management letters from your auditor accompanying the audited financial statements.

A: pls see document [A-4-1, A-4-2 Financial statements] in file [A-4], which is audited.

3. If the financial statements in A-4.1 are unaudited, provide for each company: A: N/A
   (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.

4. Does your company maintain different profit centres? If yes, provide profit & loss statements for the profit centre that the goods falls into for: A:No, we don't maintain different profit centre.
   (a) the most recent financial year and
   (b) the period.

5. 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

   A: pls check document [A-4-5 (a) Income statements for most recent financial period] in file [A-4]
   (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.

A: pls check document [A-4-5 (b) half yearly income statements directly from our accounting system] in file [A-4]

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

A: pls check document [A-4-6 Trial balance covering the period] and [A-4-6 Trial balance covering the most recent financial year] in file [A-4]

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

A: pls check document [A-4-7 our company's chart of accounts] in file [A-4]

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 A: Joining the Solar Fair
   (b) Price determination and/or negotiation process A: Customer RFQ→ Quotation → Multiple rounds of quotations → Awarding of purchase order
   (c) Order placement process A: After we receiving the order from customer, we will issue our internal order in [redacted] system, and [redacted] he relevant department to arrange the procurement and production
   (d) Order fulfilment process and lead time A: material procurement, quality inspection, we subcontract the raw material cutting, production, packing and loading. usually lead time is the [redacted]
   (e) Delivery terms and process A: [redacted] Usually, If we do [redacted] we pay the truck company and pay the forwarder. But in excel questionnaire [B-2 Australian sales], though the delivery terms is [redacted], but due to this is the first PO that customer changes the [redacted]
   (f) Invoicing process A: after we receive the BL, we will issue the invoice based on the shipped on board date as the invoice date, and then send the invoice to customer by email
   (g) Payment terms and process A: Payment terms: [redacted] process: we issue the invoice to customer; our customer will submit the invoic [redacted] o do the bank discount; we will receive [redacted] that the invoices have been discounted (paid).

Provide a separate explanation of the export sales process for sales that are part of a project and for sales that are commodity-based transactions.
A: Our company does not engage in project-based export sales. We are a supplier of bracket products, and our export products are sold as standard goods to customers in Australia on [redacted] basis. We do not participate in, nor provide services for, any integrated engineering projects in Australia, including but not limited to project design, system integration, on-site installation, or project management. So we don't have a separate explanation of the export sales proceed for sales that are part of a project. Above mentioned process is the process for sales that are commodity-based transactions.

2. In what currency do you invoice your customers for goods exported to Australia? If it is not in your local currency: A: USD
   (a) Do your customers pay you into a foreign currency denominated account? If yes, provide details A: Yes, they pay us to our USD currency account in [redacted] Bank [redacted] bank accoun [redacted] ng New Energy Equipment Co., Ltd,: [redacted] SWIFT Code: [redacted]
   (b) Do you u [redacted] lock in the fo [redacted] te relating to the export sales? If yes, provide details A:No
   (c) How is the exchange rate determined in your accounting system and how often is it updated? A: Updated at the end of each month, using the mid-market rate of the corresponding currency from Bank of China on the last business day as the system exchange rate for the following month.

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.
A: No, there isn't

4. If sales are in accordance with price lists or price extras list, provide copies of these lists.
A: we adopt a method of negotiating prices on a case-by-case basis, without having a unified price list.

5. If sales are based on projects that also include other components, please provide the scope of work (services and products) that your company uses to bid for contracts.

A: The scope of our products is the solar steel bracket

6. 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. A:No

7. 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. A:No

8. 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. A:No

9. In establishing the date of sale, the commission will normally use the date of invoice as it best reflects the material terms of sale:
    (a) Are you claiming a date other than the invoice date as the date of sale? A: No
    (b) If you are claiming a date other than the invoice date as the date of sale, why does this date better reflect the material terms of sale? Provide evidence to support your claim. Any claim for an adjustment would need to substantively address:
        - whether, why, and to what degree, the considerations in determining price differed between export and domestic sales
        - whether the materials cost differs at the time of subsequent invoicing of that export sale (compared to domestic sale invoices in the same invoice month of that export sale) having regard to factors such as the production schedules for domestic and export; and lead times for purchasing main input materials
        - whether contracts were entered into for the materials purchases, and materials inventory valuation.

Note that any date of sale claim, other than the invoice date, that is made after submitting a response to this questionnaire may not provide the commission with sufficient time to assess the claim and may not be considered.

B-2 Australian sales listing

1. Complete the worksheet named “B-2 Australian sales” A:Completed
    - 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.
    - This worksheet must also include exports of the goods that have been exempted from anti-dumping duties under 8(7) and section 10(8) of the *Customs Tariff (Anti-Dumping) Act 1975.*[2]
    - You must provide this list in electronic format using the template provided.
    - If you have used formulas to complete this worksheet, these formulas must be retained.
    - If there are any direct selling expenses incurred in respect of the exports to Australia not listed in the spreadsheet, add a column. For example, if the delivery terms make you responsible for arrival of the goods at an agreed point within Australia (e.g. delivered duty paid), insert additional columns in the spreadsheet for all other costs incurred.

2. For any sales exported to Australia through an intermediary, add the following to the “B-2 Australian sales spreadsheet” for those transactions:
    a. Name of the end customer in Australia
    b. Price at which the goods are sold to that customer
    c. The delivery terms of the sale to that customer

[2] Refer to Ministerial Exemption Instrument No 1 of 2016, Ministerial Exemption Instrument No 3 of 2021, Ministerial Exemption Instrument No 5 of 2022, Ministerial Exemption Instrument No 1 of 2023, Ministerial Exemption Instrument No 3 of 2023 and Ministerial Exemption Instrument No 2 of 2024. More information on these exemptions is available on the HSS Dumping Commodity Register.

A: [redacted] s from [redacted]
is [redacted] For the downstream sale in Australia, we don't know. We have
c [redacted] they also don't know.

3. 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". A:Completed

B-3 Sample export documents

1. Select the two largest invoices by value and provide the following documentation:

A: pls check the file [B-3 Sample export documents]

- Contracts
- Purchase order and order confirmation
- Commercial invoice and packing list
- Proof of payment, remittance advice 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.

If you sell the goods as part of a project, select two projects that have the largest HSS value and provide the following documentation:

- Project costing documents and schedules A: Not available, we sold goods as commodity
- Contracts
- Purchase order and order confirmation
- Commercial invoice and packing list
- Proof of payment, remittance advice 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. A: Completed, pls check sheet [B-3-2 table reconciling the details in the "B-2 Australian sales]

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. A: Completed
   - 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 source documents & worksheets, other than those in A-4, B-2 and D-2, required to complete the "B-4 Upwards sales" worksheet. A: Completed. Pls see the document [B-4 July 2025 - June 2026 Zhenjiang Revenue and Cost] in excel questionnaire [G-8]
   - For example, worksheets (e.g. a master sales listing) showing how you identified and categorised:

    - Sales of the goods under consideration and other sales (e.g. non-goods or services)
    - Domestic, Australian and third country sales of the goods under consideration
- If the documents include spreadsheets, all formulas used must be retained
- There must not be any balancing amounts. All amounts must be supported by source documents.

3. For all amounts in the "B-4 Upwards sales" worksheet that are hard coded (i.e. not a formula), please cross-reference by providing: A:Completed
    - 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.

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.

A: During the period, our products were exported to Australia is round tube [redacted] it's hot dipped galvanized, and with one end swagged,
the Material/Chemical Composition: Low-alloy high-strength structural steel.
Performance standard: The raw materials comply with [redacted]
Production process: Cutting of raw materials, cold bending and high-frequency welding to form tubes, sawing for material cutting, extrusion to reduce diameter, drilling, hot galvanizing, packaging and shipping.
Final usage: Main shaft of photovoltaic tracking support structure.
For the technical requirements, pls refer to the file [C-1 TORQUE TUBE REFERENCE DRAWINGS]
For specification details, pls check the [B-2 Australian sales] of questionnaire excel.

[3.1] MCC Category 1 - Prime	[3.1] MCC Category 2 - Galvanising	[3.1] MCC Category 3 - Finish	[3.1] MCC Category 4 - Shape	[3.1] MCC Category 5 - Steel grades	[3.1] MCC Category 6 - Ends	[3.2] MCC
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S
P	HDG	N	C	450	S	P-HDG-N-C-450-S

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.

   A: We only have one MCC, which is P-HDG-N-C-450-S

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.

A: During the period, the products sold on our domestic market is the square tube, and it's pre-galvanized with ZAM.
Material/Chemical Composition: Hot-dip Galvanized High-strength Structural Steel.

Performance standard: The raw materials comply with the standard "EN 10346".
[redacted]
Production process: Preparation of raw materials, cutting and sizing of raw materials, cold bending and high-frequency welding into tubes, sawing and cutting, packaging and shipping.
Final usage: Fixed inclination photovoltaic support structure.
For the technical requirements, pls refer to the file [C-2 Square tube drawing],
For specification details, pls check the [D-2 Domestic sales] of questionnaire excel.

[3.1] MCC Category 1 - Prime	[3.1] MCC Category 2 - Galvanising	[3.1] MCC Category 3 - Finish	[3.1] MCC Category 4 - Shape	[3.1] MCC Category 5 - Steel grades	[3.1] MCC Category 6 - Ends	[3.2] MCC
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P
P	PG	N	R	350	P	P-PG-N-R-350-P

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.

A: We only have one MCC, which is P-PG-N-R-350-P

C-3 Internal product codes

1. Does your company use product codes or stock keeping unit (SKU) codes? A: No.
   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.

A: we don't have product or SKU coding system for the goods, the code is from our customer. but we record the code in our production process.

(b) Provide details on how you mapped the product or SKU codes to the MCC for the purpose of completing this questionnaire. A: we map by: Customer product number → Technical specifications / drawings → ADC MCC.

(c) Provide a table showing the product or SKU codes for each MCC. A:Pls check Excel questionnaire [B-2] and [D-2]

If no:

(a) Provide details on the method used to identify the MCC in the sales and cost spreadsheets.
A: MCCs were determined from the technical drawings and specifications including galvanization, finish , shape , yield strength , swaging end configuration and hole configuration.

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
   A: Referral from an existing customer； Joining the Solar Fair
   (b) Price determination and/or negotiation process
   A: Customer bidding → Quotation → Multiple rounds of quotations → Awarding of contract
   (c) Order placement process
   A: Order creation and entry → Internal review and verification → Official release and generation
   (d) Order fulfilment process and lead time
   A: Process: Reception → Review → Manufacturing → Packaging → Delivery → Tracking;Delivery time: As per the contract agreement
   (e) Delivery terms and process
   A: Delivery terms: [redacted] Process: Order review → Inventory preparation and quality inspection → Warehouse dispatch and shipment → In-transit tracking → Receipt and acceptance → Document settlement
   (f) Invoicing process
   A: Log in to the [redacted] → Confirm the invoicing limit → Select the invoicing type
   (g) Payment terms and process
   A: Payment terms: [redacted]. Process: Payment application → Approval → Verification → Payment

Provide a separate explanation of the domestic sales process for sales that are part of a project and for sales that are commodity-based transactions.
A: Our company does not engage in project-based sales. We are a supplier of bracket products, and our products are sold as standard goods to customers on a transaction-by-transaction basis. We do not participate in, nor provide services for, any integrated engineering projects, including but not limited to project design, system integration, on-site installation, or project management. So we don't have a separate explanation of the export sales proceed for sales that are part of a project. Above mentioned process is the process for sales that are commodity-based transactions.

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. A:NO

3. If sales are in accordance with price lists or price extras list, provide copies of these lists. A:No

4. If sales are based on projects that also include other components, please provide the scope of work (services and products) that your company uses to bid for contracts. A: The scope of our products is the solar steel bracket

5. 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. A: NO

6. 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.

A: Yes, we did. [redacted]

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

A: Yes, we did. [redacted] the process is that we issued the credit note to our customer, and their bank will deduct the interest when pay us cash discount.

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:
   (a) Are you claiming a date other than the invoice date as the date of sale? A: NO
   (b) If you are claiming a date other than the invoice date as the date of sale, why does this date best reflect the material terms of sale? Provide evidence to support your claim. You would need to substantively address:
      - whether, why, and to what degree, the considerations in determining price differed between export and domestic sales
      - whether the materials cost differs at the time of subsequent invoicing of that export sale (compared to domestic sale invoices in the same invoice month of that export sale) having regard to factors such as the production schedules for domestic and export; and lead times for purchasing main input materials
      - whether contracts were entered into for the materials purchases, and materials inventory valuation.

Note that any date of sale claim, other than the invoice date, that is made after submitting a response to this questionnaire may not provide the commission with sufficient time to assess the claim and may not be considered.

D-2 Domestic sales listing

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

2. Complete worksheet “D-2.2 domestic sales source” listing the source of the data used for each column in worksheet “D-2 domestic sales”. A: Completed

D-3 Sample domestic sales documents

1. Select the two largest invoices by value and provide the following documentation:

A: pls check the file [D-3 Sample domestic sales documents]

   - Contracts
   - Purchase order and order confirmation
   - Commercial invoice and packing list
   - Proof of payment, remittance advice and accounts receivable ledger
   - Documents showing bank charges
   - Delivery invoices

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

If you sell the goods as part of a project, select two projects that have the largest HSS value and provide the following documentation:

   - Project costing documents and schedules A: Not available, we sold goods as commodity
   - Contracts

- Purchase order and order confirmation
- Commercial invoice and packing list
- Proof of payment, remittance advice 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. A: completed, pls check document [D-3-2 table reconciling the details in the "D-2 Domestic sales"]

D-4 Reconciliation of sales to financial accounts

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

1. Please complete the worksheet named "B-4 Upwards sales" to demonstrate that the sales listings in D-2 and F-2 are complete. A: completed
   - 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 and worksheets, 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. A: There is no need to make a separate request, as the upward sales of B-4 have been completed and the reconciliation for B-2, D-2 and F-2 has been provided.
   - For example, worksheets (e.g. a master sales listing) showing how you identified and categorised:
     - Sales of the goods under consideration and other sales (e.g. non-goods or services)
     - Domestic and third country sales of the goods under consideration
   - If the documents include spreadsheets, all formulas used must be retained
   - There must not be any balancing amounts. All amounts must be supported by source documents.

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: A: completed
   - 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.

SECTION E
DUE ALLOWANCE

E-1 Credit expense

1. For each Australian customer of the goods and each domestic customer of like goods, calculate the average credit period for that customer by:
   - Calculating the average accounts receivable over the period for that customer.
     - This is usually calculated by either:
       - summing the accounts receivable opening balance and closing balance for the period, and dividing it by 2, or
       - summing the average monthly accounts receivable over the period and dividing it by 12.

If there is a more accurate way of calculating the average accounts receivable (e.g. the customer only made pu e
A: [redacted]
(T s ord in their system is RMB);
[redacted] Co., Ltd.: [redacted] Technology [redacted]

   - Calculating the accounts receivable turn od for that customer using the formula:

$$\frac{\textit{Net sales revenue over the peirod}}{\textit{unts receivable}}$$

2. A: [redacted] 27.35; [redacted] 23.68
Z ew Ene
[redacted] echnology Co., Ltd.: 12

   - Calculating the average credit period for that customer using the formula:

$$\frac{365}{\text{ivable turnover}}$$

A: [redacted] 13.35 ; [redacted] 15.41
Zh ew Ener
[redacted] Technology Co., Ltd.: 30.42

3. Do you have short term borrowings or an overdraft facility denominated in your local currency? If yes, what is the interest rate, or e of interest rates?
A:Yes, the average value is [redacted]

4. Do you have any interest earning deposits or other cash product (e.g. term deposits, bonds) denominated in your local c If yes, what is the interest rate, or average of interest rates?
A: Yes, the average value is [redacted]

5. If your Australian customers pay you into a foreign currency denominated account (question B-1.2(a) refers):
   (a) Do you have short term borrowings or an overdraft facility denominated in the same foreign c y? If yes, what is the interest rate, or average of interest rates? A: Yes, the average value is [redacted]
   (b) D have any interest earning deposits or other cash product (e.g. term deposits, bonds) denominated in the same foreign currency? hat is the interest rate, or average of interest rates? A: Yes, the average value is [redacted]

E-2 Packaging

1. What is the packaging used for your domestic sales of like goods? A: wooden dunnage and Plastic packing belt

2. What is the packaging used for your export sales of the goods to Australia? A: wooden dunnage and Plastic packing belt and steel frame

3. If there are distinct differences in packaging between your domestic and export sales:

(a) Provide details of the differences A:For Australia export, we use steel frame, for domestic and other export, we don't use steel frame.
(b) [redacted]ighted average packaging cost for each model sold on the domestic market
(c) [redacted]ghted average packaging cost for each model exported to Australia

E-3 Delivery

1. Are any domestic sales of like goods delivered to the customer? If yes, how were the transportation costs calculated in the domestic sales listing in D-2?
   A: Yes, calculated based on the tonnage of the products.

2. What are the delivery terms of the export sales of the goods to Australia? A: [redacted]

3. If the delivery terms of the Australian sales include delivery to the port, how was the inland transport calculated in the Australian sales listing in B-2? A: According the invoice amount from truck company.Using the unit weight divide the whole weight, and then multiply the truck charge of whole shipment.

4. If the delivery terms of the Australian sales include port handling and other export charges, how were these expenses calculated in the Australian sales listing in B-2? A: According the invoice amount from forwarder. Using the unit weight divide the whole weight, and then multiply the forwarder charge of whole shipment.

5. If the delivery terms of the Australian sales include ocean freight, how was the ocean freight cost calculated in the Australian sales listing in B-2? A: not applicable

6. If the delivery terms of the Australian sales include marine insurance, how was the marine insurance calculated in the Australian sales listing in B-2? A: not applicable

7. If the delivery terms of the Australian sales include delivered duty paid, how were the Australian importation and delivery costs calculated in the Australian sales listing in B-2? A: not applicable

E-4 Other direct selling expenses

1. Do you provide sales commissions for domestic sales of like goods and/or export sales of the goods? If yes, provide details. A: No

2. Are there any differences in tax liability between domestic and export sales? If yes, provide details, for example:
   - What is the rate of value-added tax (VAT) on sales of the goods and like goods? [redacted]
   - How is VAT accounted for in your records in relation to sales of the goods and li s?

   A:Our company is a manufacturing enterprise. For the goods produced by the company itself, the export exemption, credit, and refund policies apply:
   1. Exemption: The output tax of exported goods is exempted.
   When selling domestically, one needs to accrue output tax; for export, this output tax is directly exempted and does not need to be paid.
   Note: Exemption does not mean refund. It merely means no collection of output tax. The input tax for purchasing raw materials still exists.
   2. Credit: The input tax corresponding to the exported goods is used to offset the payable value-added tax generated from domestic sales.
   If an enterprise has both domestic sales and exports, the input tax is mixed together.
   First, use the input tax corresponding to the export to offset the value-added tax that needs to be paid for domestic sales.
   3. Refund: If the input tax is fully credited and the payable tax for domestic sales is reduced, and there is still remaining input tax that has not been fully credited, this part can be refunded to the enterprise.

Our company's export product's output tax rate is [redacted] and the refund rate is also [redacted] There is no difference between the collection rate and the ref te. There is no part where ut tax needs to be transferred out.

- Do you receive a VAT refund in relation to sales of the goods and/or like goods? A: Yes
- Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods? A: No

3. Are there any other direct selling expenses incurred by your company in relation to domestic sales of like goods? A:No

4. Are there any other direct selling expenses incurred by your company in relation to export sales of the goods to Australia? A:No

E-5 Other adjustment claims

1. Are there any other adjustments required to ensure a fair comparison between the export price and the normal value (based on domestic sales, costs and/or third country sales)? If yes, provide details and supporting documentation. A: we don't have other adjustment required
   - 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)*[3] for more information.

[3] Available on the commission website

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.
   A: No. the sales processes is same, but the currency and payment terms varies.
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.
   A: No
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: No, we don't have claim
   (a) What date are you claiming as the date of sale?
   (b) Why does this date best reflect the material terms of sale? Any claim for an adjustment would need to substantively address:
   - whether, why, and to what degree, the considerations in determining price differed between export and domestic sales
   - whether the materials cost differs at the time of subsequent invoicing of that export sale (compared to domestic sale invoices in the same invoice month of that export sale) having regard to factors such as the production schedules for domestic and export; and lead times for purchasing main input materials
   - whether contracts were entered into for the materials purchases, and materials inventory valuation.

F-2 Third country sales listing

4. Complete the worksheet named "F-2 Third country sales" A: Completed
   - 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.

5. 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". A: Completed

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.

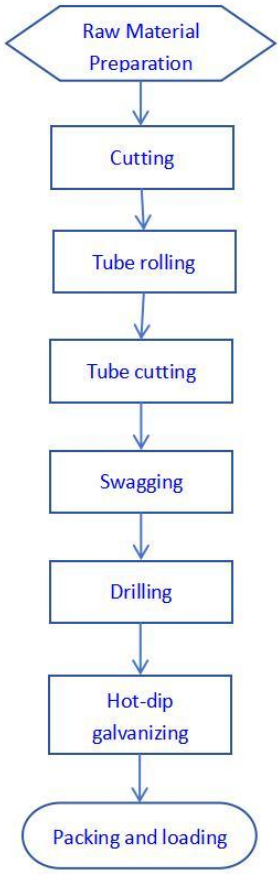
A: The general third-country sales process of JZNEE is the same as its Australian export sales process. However, individual third-country transactions may differ in terms of currency, payment terms, and delivery terms. These differences are reported item by item in F-2, and any related sales expenses are reflected in the applicable schedule. These may affect their comparison to export sales to Australia

SECTION G
COST TO MAKE AND SELL

G-1 Production process

1. Describe your 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. Provide different diagrams:
    a. if you are an integrated producer – ie you make the steel coil and then roll the HSS,
    b. and/or if you buy the steel coil and then roll the HSS,
    c. and/or you buy the HSS and perform further work

A: We purchased the raw material and have the subcontractor to produce the HSS. pls see below production process for the goods of Australia sales.



Also specify all scrap or by-products that result from producing the goods.

A: The by-products is raw material cutting wire thread and joint tube.

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. A: No, there isn't

G-2 Cost accounting practices

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

A: actual cost

2. If your company uses standard costs: A: Not Applicable
    (a) Were standard costs used as the basis of actual costs in your responses G-3.1 & G-5.1?

(b) Have all variances (i.e. differences between standard and actual production costs) been allocated to the goods?
(c) How were those variances allocated?
(d) Provide details of any significant or unusual cost variances that occurred during the period.

3. Briefly explain your cost accounting practices (e.g. job costing, process costing).
A: individual pricing costing

4. 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. A: No, we don't

5. To what level of product specificity (models, grades etc.) does your company's cost accounting system normally record production costs? A: whole purchase order.

6. Are there any costs for management accounting purposes valued differently to financial accounting purposes? If yes, provide details of the differences. A:No, there isn't

7. Has your company engaged in any start-up operations in relation to the goods? If yes: A:No, we haven't
(a) Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.
(b) State the total cost of the start-up operation and the way that your company has treated the costs of the start-up operation in its accounting records.

8. 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)? A:Not applicable

9. What are the valuation methods for damaged or sub-standard goods generated at the various stages of production? A:Not applicable

10. What are the valuation methods for scrap, by products, or joint products? A:During production, the value of waste materials is not estimated. When the waste materials are actually sold, the proceeds are recorded as other income / other business income and the production cost is not adjusted.

11. Are any management fees/corporate allocations charged to your company by your parent or related company? If yes, provide details A:No

G-3 Cost to make on domestic market

1. Complete the worksheet named "G-3 Domestic CTM". A: Completed
   - This worksheet lists the quarterly cost to make the domestic models of like goods by MCC manufactured within the period, even if they are models not exported to Australia.
   - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
   - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture like goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
   - You must provide this list in electronic format using the template provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.
   - If you have claimed in B-1.8 and/or D-1.7 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all domestic sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.

2. 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". A: Completed

G-4 Selling, General & Administrative expenses

1. Complete the worksheet named "G-4.1 SG&A listing". A: Completed
   - This worksheet lists all selling, general and administrative expenses by accounting code for the most recent accounting period and the period. The SG&A must also include:
     - finance expenses
     - taxes and surcharges (except income/profit tax).
   - In the column “Is it a direct selling expense”, identify expenses related to direct selling expenses (e.g. inland transport) that has been reported in B-2 Australian sales and/or D-2 Domestic sales.
   - In the column “Is it provisional or unrealised?”, identify any accounts that are not actual or realised, such as:
     - unrealised foreign exchange gains/loss
     - provision for doubtful debt
   - In the column “Is it only related to exports or non-goods?”, identify any accounts that are related only to either:
     - export sales
     - products that are not the goods under consideration.
   - 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". A: Completed
   - 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.

3. Complete the worksheet named "G-4.3 Upwards SG&A" to demonstrate that the SG&A listing in G-4.1 is complete by reconciling the SG&A listing to the trial balance and the audited income statement.
   A: Completed
   - You must provide this list in electronic format using the template provided.
   - Please use the formulas provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.

4. Please provide the relevant general ledgers (i.e. the detailed listings) of all SG&A accounts (in Excel) covering the period and the most recent financial year.
   A:Pls check document [G-4-4 all SG&A accounts]

G-5 Cost to make the goods exported to Australia

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

2. Complete worksheet titled "G-5.2 Australian CTM source" listing the source of the data for each column of worksheet "G-5 Australian CTM". A: Completed

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: Material weight allocation
   (a) Raw materials
   (b) Labour
   (c) Manufacturing overheads

2. Select the domestic model (export model if you have no domestic production of like goods) with the largest production volume over the period and provide worksheets demonstrating the allocation method described in G-6.1 from your normal cost accounting system to the cost for that model reported in G-3.1.
   A: Not applicable

G-7 Major raw material costs

1. What are the major raw materials used in the manufacture of the goods? A: Carbon steel

2. Are any raw materials sourced as part of an integrated production process or from a subsidiary company which your company exercise control? If yes, complete the worksheet named "G-7.2 Raw material CTM" for these raw materials. A: No, there isn't
   - This worksheet lists the quarterly cost to make the raw material manufactured within the period.
   - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold).
   - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the raw material, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
   - You must provide this list in electronic format using the template provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.

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

4. For each raw material identified in G-7.3 which individually account for [redacted] or more of the total cost to make, complete the worksheet named "G-7.4 Raw material purchases ompleted
   - This worksheet lists all raw material purchases (i.e. transaction by transaction) purchased by your company within the period.
   - You must provide this list in electronic format using the template provided.

- If you have used formulas to complete this worksheet, these formulas must be retained.

5. Provide a table listing the source of the data for each column of the "G-7.4 Raw material purchases" listing. A: pls check document [G-7-5]

6. For each raw material:
   (a) Select the two largest invoices by value and provide the commercial invoice and proof of payment. A: pls check file [G-7-6 (a)]
   (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. A: completed

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. A:No,there is no supplier is related to our company.

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. A:Completed
   - 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 and worksheets, other than those in A-4, G-3 and G-5, required to complete the "G-8 Upwards costs" worksheet. A: Completed, pls see the document [July 2025- June 2026 Zhenjiang Revenue and Cost] in Excel questionnaire [G-8]
   - For example, worksheets showing how you identified and categorised the cost to make:
     - the goods under consideration and other costs (e.g. non-goods or tolling services)
     - Domestic, Australian and third country goods under consideration
   - If the documents include spreadsheets, all formulas used must be retained.
   - There must not be any balancing amounts. All amounts must be supported by source documents or worksheets.

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.

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.
   A: we have technical department to calculate the unit weight of each specification of tube as per drawing. And then we use the unit weight to multiply the pcs to calculate the total metric tons.

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.
   A: We use the Excel sheet and Kodcloud system to keep our production quantities. Our accounting system does not have a quantity. Our finance department uses manual Excel accounts.

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

A: In China, CTM is mainly outsourced for processing. Our company provides materials to the external contract suppliers. After the suppliers complete the processing, we receive the finished products. Therefore, there are no direct labor costs, manufacturing expenses, etc. There is no difference between manufacturing

cost and sales cost. The main difference lies in that we will systematically issue materials needed for the project to the external contract suppliers in advance. The suppliers will keep material inventories and use the materials according to the project progress. The sales cost will be transferred according to the approximate progress of the project.

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

A: The difference between the manufacturing cost and the sales cost of CTM in Australia mainly lies in that during our production process, we will produce a small amount of inventory in advance to meet the additional orders from customers when the order quantity is lower in the future or for project quality replacements, in order to save the material and labor costs for re-cutting production. This inventory will be transferred to costs based on sales performance. The current difference is caused by the fact that some of the inventory has not yet been sold. Pls check document [G-8 July 2025 - June 2026 Zhenjiang Revenue and Cost]

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?

A:Volume of Production:Our company determines production volume primarily based on the following factors: Customer orders and sales forecasts.The sales department provides monthly rolling forecasts based on confirmed orders and tube demand. Production plans are prepared accordingly.
Production capacity: Our facility operates 1 production lines with a maximum monthly capacity of 5000 tons. Shift arrangements are adjusted based on demand.
Raw material availability: Procurement lead time are factored into production scheduling.

The product mix is determined by:
Market demand for different product specifications/models, as reflected in customer orders and sales forecasts;
Profitability analysis — higher-margin products are prioritized in production scheduling;
Frequency:
Production volumes are determined on a monthly basis through our Sales & Operations Planning process, with weekly adjustments based on actual order intake.
Product mix is reviewed and adjusted on a monthly basis, in line with updated sales forecasts and customer requirements.

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

A: From current utilization to full capacity:[redacted]
Key constraints: raw material procurement lead time for carbon steel is approximate[redacted]
Lead time to decrease production volume:
Production can be reduced within[redacted]by adjusting shift schedules.
Lead time to switch product mix:
Changeover between standard product types typically require[redacted], including line cleaning, reconfiguration, and quality testing.
Switching to a significantly different specification may require up[redacted]

SECTION H
PARTICULAR MARKET SITUATION

It is a mandatory requirement to complete this section.

H-1 Reporting requirements

1. Describe generally all interaction that your business has with the Government of China at all levels, including (but not limited to): A: Our company, Jiangsu Zhenjiang New Energy Equipment Co., Ltd. ("Zhenjiang Shares" or the "Company"), is a privately-owned, publicly-listed manufacturing enterprise incorporated in Jiangyin City, Jiangsu Province, China. We are listed on the Shanghai Stock Exchange (stock code: 603507). The Company is not a state-owned enterprise (SOE), and we are not supervised, controlled, or managed by the State-owned Assets Supervision and Administration Commission (SASAC) or any body under SASAC control.

Our interactions with the Government of China at all levels (national, provincial, municipal, and local) are limited to the routine regulatory, compliance, and administrative obligations applicable to all privately-owned manufacturing enterprises operating in China. These interactions are described in detail below.

(a) reporting requirements

A: As a publicly-listed company on the Shanghai Stock Exchange (SSE), our primary reporting obligations are to securities regulators and stock exchange authorities, not to industrial or operational government agencies. Our reporting requirements include:

Securities regulatory reporting: We are required to file periodic reports with the China Securities Regulatory Commission (CSRC) and the SSE, including annual reports, semi-annual reports, and quarterly reports, in accordance with the PRC Securities Law and SSE Listing Rules. These reports disclose our financial performance, major transactions, related-party transactions, and other material information.

Corporate governance reporting: We maintain internal governance systems (including board rules, independent director systems, audit committee procedures, and related-party transaction management systems) that are filed with and overseen by the SSE.

Tax reporting: We file routine tax returns with local tax authorities on a monthly, quarterly, and annual basis, covering corporate income tax, value-added tax (VAT), individual income tax withholding for employees, and other applicable taxes.

Statistical reporting: We submit routine statistical data to local statistical bureaus as required by national statistical regulations, covering production output, employment, and other economic indicators.

Environmental and safety reporting: As a manufacturing enterprise, we file periodic environmental compliance reports and workplace safety reports with local environmental protection and emergency management authorities.

Foreign exchange reporting: Given our significant export business, we report foreign exchange receipts and payments to the State Administration of Foreign Exchange (SAFE) through our banking channels, in compliance with PRC foreign exchange administration regulations.

All of the above reporting requirements are standard regulatory compliance obligations applicable to all companies of our type in China. They do not involve any government supervision of our business operations, pricing, or commercial decisions.

(b) payment of taxes

A: We pay taxes to Chinese tax authorities in accordance with PRC tax laws and regulations. Our tax obligations include:

Corporate income tax: Paid at the standard statutory rate applicable to manufacturing enterprises, with any applicable preferential rates for high-tech enterprise status or R&D super-deduction benefits.

Value-added tax (VAT): Paid on our domestic sales, with input VAT credits for purchases.

Individual income tax withholding: Withheld from employee salaries and remitted to tax authorities.

Other taxes: Including urban construction tax, education surcharge, stamp duty, and property tax, as applicable.

(c) senior management representation within your business supervision by the State-owned Assets Supervision and Administration Commission (SASAC) or a body under the control of SASAC

A: Ou company is not supervised by SASAC or any body under SASAC control.

[redacted]rship structure: The [redacted]ntrolling shareholders and actual controllers are Mr. [redacted] (Chairman) and Ms. [redacted] who are private ind[redacted] As of the latest disclosu[redacted]r. d Ms. [redacted] directly an[redacted]ntrol approximately [redacted] of the Company's shares. The remaining shares are held by public investors through the [redacted] Stock Exchange.
No state ownership: There is no state-owned capital holding in the Company, and no SASAC-appointed representatives on our Board of Directors or senior management team.
Management independence: Our senior management team, including the Chairman, General Manager, Chief Financial Officer, and Board Secretary, are appointed by the Board of Directors through corporate governance procedures in accordance with the PRC Company Law and our Articles of Association. Their appointments are not subject to government approval or SASAC oversight.
Board composition: Our Board includes independent directors who are elected by shareholders. There are no government-appointed or SASAC-appointed directors.

(d) approval/negotiation of business decisions (e.g. investment decisions, management decisions, pricing decisions, production decisions, sales decisions)

A: All business decisions of the Company are made independently by our management and Board of Directors, without any government approval, negotiation, or direction.

(e) Licensing

A: We hold the standard business licenses and operational permits required for manufacturing enterprises in China, including:
Business license: Issued by the local market regulation administration, permitting us to engage in the design, manufacture, and sale of wind power equipment, photovoltaic mounting structures, and fasteners.
Environmental permits: Including environmental impact assessment approvals and pollutant discharge permits, as required for manufacturing operations.
Workplace safety permits: Including workplace safety production licenses, as applicable.
Quality certifications: Including ISO 9001, ISO 14001, ISO 45001, EN 1090, and ISO 3834 certifications, which are obtained from independent certification bodies, not government agencies.
Export licenses: Including customs registration and export qualification filings, as required for export operations.
All of the above licenses and permits are standard regulatory requirements applicable to all manufacturing enterprises in China. They do not confer any special privileges or impose any export-contingent conditions.

(f) restrictions on land use A: Our manufacturing facilities in China are located on land obtained through standard commercial land use rights in accordance with PRC land administration laws. The land use rights were obtained through market-based mechanisms (such as public tender, auction, or listing processes) from local land administration authorities, at market-determined prices. There are no special land use restrictions or preferential land use arrangements imposed by the government that are contingent upon export performance or any other government-directed conditions.

(g) provision of loans or

A: The Company obtains financing from commercial banks and capital markets on market-based terms:
Bank loans: We maintain credit facilities with commercial banks in China. These loans are obtained through standard commercial lending procedures, at market-determined interest rates, and are not subsidized or directed by the government.
Capital market financing: As a publicly-listed company, we have access to equity financing through the Shang [redacted]ange. In 2026, the Company proposed a private placement of A-shares to raise up to [redacted] for capacity expansion projects, which was conducted in accordance with CSRC and [redacted]ns through market-based pricing mechanisms.
We do not receive any government-directed loans, subsidized loans, or concessional financing from state-owned policy banks or any government entity.

(h) provision of grants, awards or other funds

A: the Company may receive certain generally available government incentives that are offered to all qualifying enterprises in China, including:
R&D incentives: Such as R&D expense super-deduction for corporate income tax purposes, which is a generally available tax incentive under PRC tax law for all enterprises that incur qualifying R&D expenditures.
High-tech enterprise benefits: If the Company qualifies as a high-tech enterprise, it may receive a reduced corporate income tax rate, which is a generally available incentive for all qualifying enterprises.

Local government incentives: Occasional local government incentives for investment, employment, or innovation, which are generally available to all enterprises in the relevant jurisdiction.
We do not receive any export-contingent grants, subsidies, or awards. Any government funds we receive are generally available incentives that are not contingent upon export performance, domestic content requirements, or any other government-directed conditions.

H-2 Business structure, ownership and management

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

   A: we are private enterprise

2. List the Board of Directors and Board of Shareholders of your business and all other entities/businesses your business i o.
   members: (C (Employee Representative Director), (Independ r), tor).
   26-06-30, the top ten s of the company are as follows:

Shareholder Name	Shareholder Nature	Number of Shares Held	Shareholding Ratio %
[redacted]	Domestic Natural Person	[redacted]	
[redacted]	Domestic Non-State-Owned Legal Person		
	Natural person within the territory		
	Domestic Non-State-Owned Legal Person		
	Foreign legal entity		
	Foreign legal entity		
	Natural person within the territory		
	Foreign legal entity		
	Natural person within the territory		
	Domestic Non-State-Owned Legal Person		

3. Indicate the names of common directors and officers between your business and related businesses, where applicable. A: Not applicable

4. Are any members of your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders representatives, employees, or otherwise affiliated with the Government of China (at any level, from any agency, party, or otherwise associated entity, including SASAC)? If yes, identify the individuals, their role on that Board and their affiliation with the Government of China. A: No, there aren't

5. Does your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders have a representative from the Chinese Communist Party (CCP)? If yes, identify their name and title and indicate their position at the board level. A: No, there doesn't

6. Are any members of your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders appointed, managed or recommended by the Government of China? If yes, identify any relevant government department(s) they are affiliated with. A: No, there aren't

7. Indicate who owns what percentage of all shares in your business and identify whether they are:
   - an affiliate, representative, agency or otherwise representative of the Government of China
   - employees of your business
   - foreign investors or
   - other (please specify)

   A: Pls see below chart

Shareholder Name:	Is it an affiliate, representative, agent, or other representative of the Chinese government?	Is it your enterprise? Employees	Is it foreign? Investors	Other (please specify) Body description)	Shareholding Ratio %
[redacted]	No	Is	No	nan	[redacted]
[redacted]					

8. Provide the details of any significant changes in the ownership structure of your business during the period. A: There is no any significant changes

9. Identify any positions within your business that are appointments or designated to act on behalf of Government of China authorities. A: No, there is no position within our business that are appointments or designated to act on behalf of Government of China authorities

10. Explain whether there are requirements in law and in practice to have government representation at any level of your business. If there is such a requirement, explain the role of government representatives appointed to any level of your business. A: No, there isn't

11. If your business is a publicly traded company, what are the rules regarding the issuance of shares by your business? Identify any stock exchanges on which your business is listed.
A: Jiangsu Zhenjiang New Energy (stock code: 603507) adopts a private placement (non-public offering) of A-shares to specific objects. The key rules are as follows:

- Issuance method: Private placement to no more than 35 qualified specific objects, all subscribing in cash at the same price.
- Issuance volume: Not exceeding [redacted] of the total share capital before the issuance, with a maximum of 71,680,198 shares.
- Pricing principle: The issue price shall not be lower than [redacted] of the average trading price of the Company's shares in the 20 trading days preceding the g benchmark date (i.e., the first day of the issuance period). The final price is determined through a bidding process.
- Lock-up period: Shares subscribed by the specific objects shall not be transferred within 6 months from the end of the issuance.
- Fundraising amount: The total amount raised shall not exceed [redacted] to be used for industrialization projects of large-megawatt offshore wind pow ents, green intelligent casting projects, and supplementing working capital.
- Approval procedures: The issuance has been approved by the Shareholders' Meeting and is subject to the review and approval of the Shanghai Stock Exchange and registration by the China Securities Regulatory Commission (CSRC).
- Control impact: The issuance will not result in a change of the Company's controlling shareholder or actual controller.

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

Month	Monthly trading volume / 10,000 lots	Average monthly transaction price / yuan
[redacted]	[redacted]	[redacted]

13. Who has the ability to reward, fire or discipline your business' senior managers?
    A: Board of directors of our company.

14. Do any of your company's senior managers hold positions in any Government of China departments or organisations, associations or Chambers of Commerce? If yes, describe the nature of these positions.
    A: No, there isn't

15. Provide the names and positions of your company's pricing committee.
    A: We don'[redacted]g committee, we have the cost calculation department for solar bracket. Whose name is [redacted] and he is the header of Solar bracket department.

H-3 Licensing

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



统一社会信用代码
91320200758486753F (1/1)

营业执照
（副本）

编号 320200666202411060002

名　　称　江苏振江新能源装备股份有限公司

类　　型　股份有限公司(上市、自然人投资或控股)

法定代表人 [redacted]

经营范围　钢结构件、通用设备的制造、加工、销售；钣金加工；自营和代理各类商品及技术的进出口业务，但国家限定企业经营或禁止进出口的商品和技术除外。（依法须经批准的项目，经相关部门批准后方可开展经营活动）

登记机关

2024 年 11 月 06 日

国家企业信用信息公示系统网址：http://www.gsxt.gov.cn

市场主体应当于每年1月1日至6月30日通过国家企业信用信息公示系统报送公示年度报告。

国家市场监督管理总局监制



Unified Social Credit Code
91320200758486753F (1/1)

Business License
(*) SCJDGL (Copy)

Number 320200666202411060002

Category

Name Jiangsu Zhenjiang New Energy Equipment Co., Ltd.

Type Limited Company (Listed, Natural Person Investment or Control)

Legal Representati [redacted]

Market Supervision

Business Scope Manufacturing, processing, and sales of steel structure components and general equipment; sheet metal processing; self-operated and agency import and export of various goods and technologies, except for goods and technologies restricted or prohibited by the state. (Projects that require approval according to law can only be carried out after approval by relevant departments)

Registration Authority

City Number Xi Data Bureau

January 6, 2024

Website of the National Enterprise Credit Information Publicity System: http://www.gsxt.gov.cn

Market entities shall submit their annual reports through the National Enterprise Credit Information Publicity System from January 1 to June 30 each year.

Supervised by the State Administration for Market Regulation

2. Identify the Government of China departments or offices responsible for issuing the license(s).
A: The business license was issued by the Wuxi Data Bureau.

3. Describe the procedures involved in applying for the license(s).
A: The company submitted an application to the Data Bureau of Wuxi City. After the application was approved, a business license was issued.

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

A: The relevant business documents should be submitted in accordance with the specific requirements of the data bureau.

5. Describe and explain any restrictions imposed on your business by the business license(s).
   A: we can only engage in business activities within the scope permitted.

6. Describe any sanctions imposed on your business if you act outside the scope of your business license(s).
   A: Not applicable, Since we never act outside the scope of our business license.

7. Describe and explain any rights or benefits conferred to your business under the license(s).
   A: Conduct normal business activities in compliance with regulations.

8. Describe the circumstances under which your business license(s) can be revoked, and who has the authority to revoke the license(s).
   A: Either through active revocation or passive revocation, the issuing authority has the right to revoke this license.

H-4 Decision-making, planning and reporting

1. Provide a description of your business' decision-making structure in general and in respect of the goods. This should identify the persons or bodies primarily responsible for deciding:

A: Jiangsu Zhenjiang New Energy Equipment Co. Ltd. is an enterprise that operates independently in accordance with market principles. The board of directors of the company is responsible for formulating the company's long-term development strategy, major investment plans, and approving the annual financial budget. The daily management is handled by the general manager, who oversees various functional departments such as the production department, the sales department, the purchasing department, and the finance department. Each department makes business decisions independently within its authority and reports to the general manager. The company's decision-making process is entirely based on commercial considerations and is not subject to any intervention from government agencies or non-market forces.

   a. what goods are produced A:The company's main business includes the design, processing and sales of components for wind power equipment and photovoltaic/thermal equipment; offshore wind power installation and operation services. The main products include wind power equipment such as rotors, stators, towers, and nacelle covers, as well as photovoltaic equipment such as fixed/adjustable photovoltaic supports and tracking photovoltaic supports. The fasteners are mainly high-quality products with anti-loosening performance, and the main customer groups are distributed in industries such as automobiles, wind power and photovoltaics, railways, construction machinery, aerospace, etc. For the involved products, the production plan is arranged based on the specific orders of Australian customers and the company's sales forecast for the Australian market.
   b. how the goods are produced A:The company's photovoltaic equipment products also adopt a production mode of "production based on sales", that is, production tasks are assigned according to product orders. The development of product samples and the improvement of process technology for the company's photovoltaic equipment products are all independently completed by the company. The company's photovoltaic equipment products mainly include fixed/adjustable photovoltaic brackets and tracking photovoltaic brackets. The main production processes of the fixed/adjustable photovoltaic brackets include welding assembly and galvanizing, while the main production processes of the tracking photovoltaic brackets include pipe manufacturing and galvanizing. During the reporting period, due to the constraints of production factors such as factory buildings and land, the company, under the premise of independently developing samples and strictly controlling processes, production standards, and quality, supplemented the production capacity gap through external processing or purchasing qualified products.
      The sales department arranges production and issues production scheduling instructions based on the signed contracts. The production department prepares production plans and arranges the workshop for production. The quality control department tests the finished products and semi-finished products according to the execution standards of the products, and evaluates the test results. After meeting the standards, they are transferred to the warehouse.
      For products produced through the external processing mode, under the premise that the product samples and process drawings independently developed by the company meet the customer's requirements, the sales department and the purchasing department, together with

the process department and the quality control department, select the external processing manufacturers and agree that they will strictly arrange production according to the company's product samples and process drawings.

c. how levels of inputs such as raw materials, labour and energy are set and secured A:The setting and guarantee of the input level are jointly completed by the Purchasing Department, the Human Resources Department and the Production Department.
Raw materials: The Purchasing Department purchases raw materials from independent third-party suppliers through market inquiries, tenders or negotiations with suppliers, based on production plans and safety inventory standards. The purchase price is determined based on market supply and demand conditions. The company has the right to independently choose suppliers and there is no mandatory designation or price control.
Labor force: The Human Resources Department recruits employees and sets salary and welfare based on production scale and job requirements, in accordance with the Labor Law and market salary levels. The number of employees and salary standards are determined by the company based on its operating conditions.
Energy: The energy consumption level is determined by the operating efficiency of production equipment and production scheduling. The company directly purchases energy from local power/gas companies or energy suppliers, with prices set according to government-guided prices or market negotiation prices, and pays the fees on time and in full.
The main raw materials of the company are steel, paint, etc. The company adopts a combined purchasing mode of inquiry and comparison, and adheres to the principle of giving priority to quality and price. The company mainly adopts the "production-based purchase" mode for procurement, that is, formulating procurement plans based on order tasks and production plans. The process department and production department are responsible for compiling, reviewing, approving and issuing material purchase lists according to customer requirements; the purchasing department is responsible for the procurement and management control of raw, auxiliary materials and equipment parts, etc.; the quality inspection department is responsible for the quality verification, discrimination and evaluation of the purchased materials.
The company has formulated strict supplier selection mechanisms and evaluation systems such as the "Procurement Management System" and "Supplier Management Procedure", to ensure the product quality of raw materials from the source. The purchasing department of the company, together with the process department, production department and quality inspection department, screens suppliers through reviewing supplier qualification documents, on-site audits, feedback records of purchasing issues, etc. Generally, there are more than three suppliers for the main raw materials to ensure the continuity of supply, as well as the controllability of price and quality. In addition, the company has formulated a complete supplier evaluation management system, and conducts regular evaluations and dynamic management of suppliers every year.

d. how the use of your outputs, such as product mix, is determined and A: The product portfolio and sales strategy are formulated by the Ministry of Commerce and approved by the management.
Decision basis: Based on the demand differences in different market segments, customer preferences, competitor situations, and the marginal contribution rates of each product.
Specific process: The company provides customized products or standard product combinations according to the specific needs of customers (such as specifications, materials, packaging, etc.). The accounting department and the solar business department have the pricing recommendation rights. The final sales price is usually determined through the "cost-plus" or "market competition-oriented" principle, combined with factors such as order quantity, payment terms, and trade terms (such as FOB, FCA), and negotiated one-on-one with customers. The company independently decides the sales proportion and channel strategies of the products in the Australian market and other markets.

e. how your business' profit is distributed. A: The company implements a continuous and stable profit distribution policy. The company's profit distribution should give due consideration to providing reasonable investment returns to investors while also taking into account the company's sustainable development. Among them, the cash dividend policy aims to achieve stable dividend growth. Profit distribution should not exceed the range of cumulative distributable profits and should not harm the company's sustainable development capabilities. During the decision-making and argumentation process of the profit distribution policy, the board of directors, the audit committee, and the shareholders' meeting should fully consider the opinions of independent directors and public investors. If there is a situation where shareholders illegally

occupy funds in the company, the company should deduct the cash dividends allocated to that shareholder to repay the funds they have occupied.
When the company's most recent annual audit report is an unqualified opinion or an unqualified opinion with a paragraph related to significant uncertainties regarding continued operation, profit distribution may not be carried out.

2. Provide a description of any Government of China input into the decision-making process respecting your manufacture, marketing and sale of the goods. A: Not applicable

3. Provide a list of all government departments/offices that are involved, either directly or indirectly, in your manufacture, sale or purchase of the goods. A: Not applicable

4. List and describe all reports that must be submitted to the Government of China periodically by your company and identify the government department/office where each report is filed. A: Not applicable

5. Provide a copy of the last two Provincial/City Five Year Plans (including the appendices) for the province/city in which your business is located, whichever is applicable. The copies should be fully translated including the appendices, along with the original Chinese version. A: Please refer to document [H-4-5 City Five Year Plans] for details.

6. Does your business develop any five-year plans or similar planning documents? If yes, provide copies of these plans and advise whether these plans have been submitted, reviewed or approved by the Government of China (including the National Development and Reform Commission). A: No, we don't develop any five-year plans or similar planning document.

7. Provide copies of the minutes of your Board of Directors and Board of Shareholders meetings over the period. A: Pls see document [H-4-7 minutes for Board of Directors] and [H-4-7-minutes for Board of Shareholders]

8. Provide copies of the notes to company meetings where pricing decisions on the goods under consideration have been made over the period. A: We don't have

H-5 Financial and investment activities

1. Is your business debt funded? If yes, provide a list of all major lenders.
A: Yes, pls check document [H-5-1 all major lenders]

2. What is the rate of interest paid by your busin[redacted] all debt instruments over the last 5 years?
A: The average interest rate is approximately [redacted]

3. Has your business benefited from any concessional interest rates for your loans/debts in the last 5 years? If yes, provide details. A: No, we haven't benefited

4. Has your business raised any capital using issuance of shares, preferential shares, rights issue, bonds, warrants, debentures, sub-ordinate loans or any other debt and/or equity instruments in the last 5 years? If yes:
    a. explain what instruments were used
    b. identify the type (e.g government guarantee) and provider of the security and
    c. explain the reasons for raising the capital.

A: In 2022, the company conducted a targeted share issuance, raising a total of [redacted] The purpose was to closely follow industry development opportunities, enhance the [redacted] able profitability, and alleviate the pressure on capital demand, as well as improve the company's capital structure.

5. Does your business have policies on how cash reserves are to be invested? If yes, provide details.
A: No, we don't have

6. Has your business invested in either government or non-government debt securities (such as bonds, quasi-government bonds)? If yes, provide details (e.g. type of instrument, amount invested and the expected rate of return). A: No, we haven't invested

H-6 Government policy on the industry

1. Are there any Government of China opinions, directives, decrees, promulgations, measures, etc. concerning industry of the goods that were put in place or operating during the period? If yes, please provide:
    a. copy of the documentation and a translation in English A: Pls see document [H-6-1-a]
    b. documentation concerning the Government of China or any association of the Government of China's notification of the measures concerning the goods to your company during the period. A: there isn't any document A: Pls see document [H-6-1-b]

2. Provide information concerning the name of any Government of China departments, bureaus or agencies responsible for the administration of all Government of China measures concerning the industry of the goods in the regions, provinces or special economic zones where your company is located, including contact information regarding the following areas:
    - industrial policy and guidance on the industry
    - market entry criteria for the industry
    - environmental enforcement for the industry
    - management of land utilization
    - the China Banking Regulatory Commission for the industry
    - investigation and inspection of expansion facilities
    - the section in the National Development and Reform Commission that is responsible for the industry and
    - import licensing for raw materials relating to the goods under consideration.

A: Pls see below:

Investigation Field	Jiangyin Government Departments	Specific Responsibilities
Industrial Policy & Industry Guidance	Jiangyin Municipal Bureau of Industry and Information Technology	Responsible for formulating industrial development policies for Jiangyin City, Guiding Key Industries
Market Access & Standards	Jiangyin Market Supervision Administration	Responsible for the management of industrial product production licenses, product quality supervision, and the implementation of local standards
Environmental Law Enforcement & Licensing	Jiangyin Ecological Environment Bureau	Responsible for the environmental impact assessment approval of enterprises within the jurisdiction, the issuance of pollution discharge permits, and daily
Land Use & Planning	Jiangyin Natural Resources and Planning Bureau	environmental law enforcement inspections. Responsible for the transfer of industrial land, management of land spatial planning, and verification
Investment Project Approval (NDRC)	Jiangyin Development and Reform Commission	of construction project planning conditions. Responsible for the filing, approval, and management of fixed asset investment projects (such as technological transformation and expansion). Responsible for the implementation of foreign
Raw Material Import License	Jiangyin Bureau of Commerce	trade policies, issuance of "Automatic Import Licenses," and management of foreign trade operation rights filing. Responsible for setting minimum wage
Labor & Social Security	Jiangyin Human Resources and Social Security Bureau	standards, regulating enterprise employment practices, and supervising the determination and collection of social insurance bases.
Taxation	Jiangyin City Taxation Bureau	Responsible for tax collection and management, export tax rebate review and corporate tax credit management

3. Describe any role your company plays in the development of government's industrial plans and/or policies at all levels of government. For example, does your company provide information for, or request inclusion in, any plans, policies, or measures?
    A: Not applicable, we don't play any role in the development of government's industrial plans or policies

4. Does your company provide information relating to assessments of the implementation of the plan, policy or measure?

A: No, we don't

5. Has the Government of China designated your company and/or industry as "pillar," "encouraged," "honourable," or any other designation? If yes, please answer the following questions.
    a. Explain the purpose of these designations, the criteria for receiving any such designation, and the benefits or obligations that arise from each such designation.

b. Is there any connection between these designations and five-year plans or other industrial and/or economic policies or administrative measures?
c. Describe any instances in which your company cited Government of China plans, policies, or measures as support for receiving the financing that you report.

A: No, the Government of China didn't designate our company or industry as "pillar," "encouraged," "honourable," or any other designation

H-7 Taxation

1. Were there any export taxes on the exports of the goods during the period? A: No, there weren't

2. What was the value-adde [redacted] e to exports of the goods during the period?
A: During the period, a total of [redacted] in export rebates was received by our company.

3. Have there been any changes to the value-added tax rebate applicable to exports of the goods in the last 5 years? If yes, provide:
   a. a detailed chronological history of the value-added tax rebate rates
   b. products affected
   c. the effective dates of the rate changes
   d. fully translated copies of any Government of China notices regarding these changes, including the relevant appendices.

A: No, there hasn't

4. Are you aware of any tax changes being planned that would impact the industry?
A: Yes, we think as the change in document [H-6-1-b], regarding the adjustment of export tax rebate policies for photovoltaic and other products, may would impact the industry.

H-8 Sales Terms

1. Identify the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by your business. Please explain if that person is responsible for both commodity pricing and projects.
   A: In our company, we have cost calculation department to calculate the commodity pricing, and our boss will confirm the pricing. For the sales terms, and other contract provisions, they are finished by each sales department themselves.

2. Explain how the selling prices of the goods under consideration by your business are determined, including any Government of China involvement in your business' pricing decisions, and indicate if the goods are subject to Government of China direct or indirect pricing or government guidance pricing.
   A: Our company determines the selling prices of the subject goods (photovoltaic mounting structures and related components) through a market-based, cost-plus pricing mechanism, independently and without any government intervention or coordination with competitors. The pricing process is as follows:
   1. Cost-Based Foundation
   The starting point for pricing is a detailed cost calculation for each project, including:
   Direct material costs: Primarily steel and aluminum, based on prevailing market prices at the time of quotation from approved suppliers;
   Direct labor costs: Calculated based on standard man-hours and wage rates;
   Manufacturing overhead: Including depreciation, utilities, and workshop expenses, allocated according to production volume;
   Logistics and packaging costs: Estimated based on destination [redacted] and shipping method.
   2. Project-Specific Adjustment Factors
   The base cost is then adjusted for project-specific factors:
   Technical specifications and customization requirements (e.g., wind/snow load standards, corrosion protection level);
   Order volume and production complexity;
   Delivery timeline and payment terms;
   Target market conditions and competitive landscape.
   3. Approval Process
   The Sales department prepares a quotation proposal based on the above analysis, which is reviewed by the Cost Calculation Department for cost accuracy and profit margin, and finally approved by our boss

before submission to the customer. For major projects, the quotation is subject to a competitive bidding process initiated by the customer.
4. Price Independence
Our company's selling prices are determined solely by commercial considerations. We don't receive any price directives from government authorities, nor does it coordinate prices with competitors. All transactions are conducted at arm's length, and prices are negotiated freely with customers based on market conditions.
5. Price Adjustment Mechanism
For long-term framework agreements, the Company includes price adjustment clauses linked to raw material price fluctuations (e.g., steel price index). This ensures that selling prices remain aligned with actual costs throughout the contract period.

3. Does your business coordinate the selling prices or supply of the goods with other domestic producers or any Government of China departments? If yes, provide details. A: No, we don't, we just calculate our cost, and then plus some margin

4. Explain whether your business provides information or data to the Government of China, other government officials or commercial/industry organisations, including those outside of China, which report on the industry. A: No, we didn't

5. Explain whether your business provides price data to any other person at the provincial, regional or special economic zone level of government. A: No, we didn't provide

6. Explain whether your business has encountered any price guidance or controls established by regional, provincial or special economic zone officials and/or organisations. A: No, we didn't encounter

7. Explain whether your business has encountered any other restrictions, limitations, or other considerations imposed on your business. A: No, we didn't encounter

8. Which organisation/business entity do you consider as the price leader of the goods?
A: We considers that there is no single price leader in the market for the subject goods. The market for [wind power mounting structures / photovoltaic support structures] is highly fragmented, with numerous manufacturers competing on price, quality, delivery capability, and technical specifications.
While certain large players such as [redacted] old significant market share in terms of shipment volume, no single entity has the ability to unilaterally set or control market prices. Prices are primarily determined by:
Raw material costs (steel, aluminum), which fluctuate according to commodity market conditions;
Project-specific requirements (customization, technical standards, delivery timelines);
Competitive bidding processes initiated by end customers (power plant developers, EPC contractors);
Regional supply-demand dynamics and logistics costs.
The Company determines its selling prices independently based on its own cost structure, target profit margin, and competitive positioning in each tender or negotiation. We do not follow or coordinate with any competitor's pricing, nor is it subject to any price-fixing arrangement.

9. Does your business have a pricing committee in respect of the goods? If yes, provide the names and positions of all members of the committee.
A: Our company does not have a formal standing committee specifically designated as a "Pricing Committee." Instead, pricing decisions for the subject goods are made through a collaborative process involving the Sales Department, Finance Department, and senior management, based on project-specific cost analysis, market conditions, and competitive positioning.
For each tender or negotiation, the Sales Department prepares a pricing proposal based on:
Raw material costs (steel, aluminum) at the time of quotation;
Manufacturing and logistics costs;
Project-specific technical requirements and delivery timelines;
Competitive landscape and customer budget expectations.
[redacted] This process ensures that prices are determined independently and reflect market conditions, without any coordination with competitors or external parties.
[redacted]y personnel involved in the pricing approval process are:
[redacted] General Manager – Final approval authority for major pricing decisions;

[redacted] Chief Financial Officer – Reviews cost structure and profit margin;
[redacted]eputy General Manager & Chief Engineer – Reviews technical feasibility and production

Sales Department Head – Prepares initial pricing proposal based on market intelligence.

10. How often does the pricing committee meet to discuss selling prices of the goods? Provide the minutes or any other relevant documents of all meetings of the pricing committee during the period.
A: we don't not have a formal standing "Pricing Committee" that holds regular meetings. Pricing decisions for the subject goods are made on a project-by-project basis through the collaborative approval process described earlier, rather than through periodic committee meetings.

11. If you have production facilities of the goods in more than one region and/or province, are the laws and regulations in each region the same with respect to pricing of the goods? If no, provide details on the differences.
A: For solar bracket, we mainly produce in our [redacted]e, at the national level, the laws and regulations governing pricing of goods in China are uniform across all provinces and regions. The Company's pricing practices in both [redacted] are subject to the same national legal framework, including the Price Law of the People's Republic of China and the Anti-Monopoly Law, which prohibit price-fixing, predatory pricing, and other anti-competitive practices. There are no region-specific pricing regulations that would cause legal differences in how the Company determines selling prices.
But our selling prices differ between [redacted] due to legitimate cost variations, such as raw material procurement costs, labor cost, logistics and transportation costs etc.

H-9 Industry associations

1. Is your business a member of any business or industry associations? If yes, explain your business' relationship with the association and the involvement of the Government of China with the associations.
A: No, we aren't

2. If your business is a member of an industry association, indicate whether this membership is voluntary or compulsory. Explain the functions that the association provides for your business. Explain in detail the role of the association with respect to the directives as provided by the Government of China concerning the industry. A: Not applicable, we are not member of an industry association

H-10 Statistics submission/recording

1. Indicate if your business makes submissions to the Chinese Bureau of Statistics and/or any other government organisation. If yes, explain the purpose of these submissions and the type of information submitted.
A: Yes.
Purpose: To collect the source data, summarize and calculate the regional macroeconomic indicators, providing them for the government to monitor the economy, formulate industrial policies, and conduct high-quality evaluations; for enterprises is a legally required obligation.
Type:
- Monthly, "Financial Status", "Total Industrial Output Value and Main Product Output", "Energy Purchase, Consumption and Inventory"
- Annual, "Financial Status (Costs and Expenses)" etc.

2. Provide a recent example of a submission that has been made to the Bureau of Statistics and/or any other government organisation. For example, monthly data relating to sales, production and costs.
A: Pls see document [H-10-2 a recent example]

3. Do the organisations approve or assess your submission? If yes, provide a detailed explanation.
A: Yes. After the data is submitted, the statistics bureau will conduct a graded review. There will be comparisons of abnormal data in terms of both month-on-month and year-on-year, and error prompts will be given during the review process.

4. Do the organisations provide feedback on your submission? If yes, provide a detailed explanation.
A: Yes. After the reporting data is returned and properly revised, if there are no issues, an explanation of the abnormal data needs to be submitted. Finally, the monthly reporting should be completed.

H-11 Production/output

1. Is any part of your production subject to any national/regional industrial policy or guidance? If yes, provide details including a background of the policy/guidance and explain any restriction imposed by the policy/guidance. To what extent are any of the policies/guidelines applicable to your business?
   A: No, there isn't
2. Where applicable, how did your business respond to the policies/guidelines? A: Not applicable

3. Provide details regarding any other restrictions (e.g. geographic/regional, downstream, end use, etc.) to the sale of the goods and/or like goods that has been placed upon, or may be imposed, by the Government of China on your business. A: There isn't

4. Provide a list of all your domestic customers of the like goods, include the location (city and province) of the customer and indicate whether each customer is an SIE.
   A: Pls see below:

Customer Name	Location (City, Province)	SIE Status
[redacted]		No
		No
		No
		No

5. Are there any restrictions and/or conditions in relation to the quality or quantity of the production of the goods placed upon your business? If yes, provide details.
   A: No, there isn't any restriction

6. Does your business require an export licence? If yes, provide details.
   A: No, it doesn't required

7. Are the goods sold by your business subject to any export restrictions and/or limits during the previous 5 year? If yes, provide details. A: No, there was no restriction

8. Have there been any changes to your production capacity over the last 5 years? If yes, provide details.
   A: Production capacity started to increase [redacted]

9. Does your business benefit from any concession on the purchase of any utility services (e.g. electricity, gas, etc.)? If yes explain the nature and the amount of the concession?
   A: No, we didn't benefit from any concession on the purchase of any utility services

H-12 Adding capacity and/or joint ventures

1. Provide a detailed explanation with respect to the government approval process on adding capacity and/or joint ventures in relation to your business.

A: Our company's decisions regarding capacity expansion and joint ventures are made independently based on commercial considerations, including market demand, competitive positioning, and financial feasibility. The government approval process in China is a standardized administrative procedure applicable to all enterprises, and does not involve government intervention in the Company's business decisions.

2. Does the government have the right to request modifications in the terms of adding capacity and/or joint ventures? If yes, provide a detailed explanation.

A: Our government does not have the authority to request modifications to the commercial terms of the Company's capacity expansion projects or joint venture arrangements. The government's role in the approval/filing process is strictly limited to ensuring regulatory compliance and does not extend to intervening in the Company's business decisions.

H-13 Raw materials

1. Are any of the suppliers related or affiliated with you? If yes, provide details. A: No, there isn't

2. Do you purchase from State Invested Enterprises? If yes, provide details. A: Yes, we do, we purchased from [redacted] Branch and [redacted] they are State Invested Enterprises.

3. If your supplier is based outside China, what import duty rate is applied on the raw materials? A: Our suppliers are not based outside China

4. Is there a price difference in purchase price for raw materials between your suppliers? If yes, provide a detailed explanation. A: Yes, the different production equipment and cost control of suppliers may affect their price.

5. Describe in detail your business' purchase procedures of the raw materials, the considerations in selecting a supplier and how the price of the raw materials is determined between you and your suppliers. If it is by tenders, provide details of the criterions/conditions.

A: We select suppliers through a bidding process among various suppliers;
in addition to considering the price of raw materials, we also take into account the delivery time and quality of the raw materials comprehensively.
The purchase prices of raw materials between our company and all suppliers (including state-owned enterprises and private enterprises) are determined through market-based methods, following the principle of independent transactions. The specific pricing mechanism is as follows:

- The purchasing department proposes purchase requirements based on the production plan;
- issues inquiry letters to [redacted] listing specifications, quantities, delivery dates, etc.;
- suppliers submit quotations within the specified time; the purchasing department comprehensively compares factors such as price, quality, delivery capacity, and payment terms, selects the best supplier; and signs the purchase contract after internal approval.
- For state-owned suppliers, we also adopt the above market-based pricing method, and there are no special arrangements or preferential treatments. The price difference compared to other non-state-owned suppliers mainly stems from [commercial factors such as purchase time, specifications, quantity, payment terms, etc.], rather than the ownership nature of the suppliers.

6. Explain whether your business has been subjected to any direct or indirect price guidance or controls by the Government of China during the period, with respect to raw material inputs. A: No, it hasn't been subjected to any direct or indirect price guidance or controls by the Government of China

7. If any of your raw materials for the goods and/or like goods are imported by your business, or related businesses: A: Not available, we didn't have raw materials for the goods and/or like goods are imported by our business, or related businesses
    a. Provide details including a description of the raw material imported, the supplier and country of origin.
    b. Explain the process required to import the raw materials (e.g. obtaining an import licence, import declarations).
    c. Provide details of any conditions to importing the raw materials (e.g. customs and/or quarantine).
    d. Are you eligible for a duty drawback? If yes, provide details.

8. Do you, or a business associated with you, sell any of the raw materials used to manufacture the goods and/or like goods, or sell the semi-processed goods? A: No, we don't
    a. Please provide a description of the raw material or semi-processed goods which are sold, including whether they are domestic or export transactions, to related or unrelated parties, and how the selling price is determined.
    b. If there is a difference in selling prices between related and unrelated parties, please provide reasons as to why.

SECTION I
COUNTERVAILING

It is a mandatory requirement to complete this section.

The following programs are known and will be investigated. Please note other programs identified during the course of the inquiry will also be investigated.

Program No.	Name	Type
1	Preferential Tax Policies for Enterprises with Foreign Investment Established in the Coastal Economic Open Areas and Economic and Technological Development Zones	Tax
2	One-time Awards to Enterprises Whose Products Qualify for 'Well-Known Trademarks of China' and 'Famous Brands of China'	Grant
6	Superstar Enterprise Grant	Grant
7	Research & Development (R&D) Assistance Grant	Grant
8	Patent Award of Guangdong Province	Grant
11	Preferential Tax Policies for Enterprises with Foreign Investment Established in Special Economic Zones (excluding Shanghai Pudong area)	Tax
12	Preferential Tax Policies for Enterprises with Foreign Investment Established in Pudong area of Shanghai	Tax
13	Preferential Tax Policies in the Western Regions	Tax
14	Tariff and VAT Exemptions on Imported Materials and Equipment	Tax
15	Innovative Experimental Enterprise Grant	Grant
16	Special Support Fund for Non State-Owned Enterprises	Grant
17	Venture Investment Fund of Hi-Tech Industry	Grant
18	Grants for Encouraging the Establishment of Headquarters and Regional Headquarters with Foreign Investment	Grant
19	Grant for key enterprises in equipment manufacturing industry of Zhongshan	Grant
20	Steel coils (black and galvanised) provided by government at less than fair market value	LTAR
21	Water Conservancy Fund Deduction	Grant
22	Wuxing District Freight Assistance	Grant
23	Huzhou City Public Listing Grant	Grant
27	Huzhou City Quality Award	Grant
28	Huzhou Industry Enterprise Transformation & Upgrade Development Fund	Grant
29	Land Use Tax Deduction	Tax
30	Wuxing District Public Listing Grant	Grant
31	Anti-dumping Respondent Assistance	Grant
32	Technology Project Assistance	Grant
34	Balidian Town Public Listing Award	Grant
35	Preferential Tax Policies for High and New Technology Enterprises	Tax

36	Local Tax Bureau Refund	Tax
37	Return of Farmland Use Tax	Tax
38	Return of Land Transfer Fee	Tax
39	Return of Land Transfer Fee From Shiyou	Tax
40	Dining lampblack governance subsidy of Jinghai County Environmental Protection Bureau	Grant
41	Discount interest fund for technological innovation	Grant
43	Enterprise famous brand reward of Fengnan Finance Bureau	Grant
44	Government subsidy for construction	Grant
46	New Type Entrepreneur Cultivation Engineering Training Fee Of Jinghai County Science And Technology Commission	Grant
47	Subsidy for Coal-Fired Boiler of Fengnan Subtreasury	Grant
48	Subsidy for Coal-Fired Boiler Rectification	Grant
49	Subsidy for District Level Technological Project	Grant
50	Subsidy For Pollution Control of Fengnan Environmental Protection Bureau	Grant
51	Subsidy from Science and Technology Bureau of Jinghai County	Grant
52	Subsidy of Environment Bureau transferred from Shiyou	Grant
53	Supporting fund for exhibition from Hongqiao District Commerce Commission	Grant
54	Government subsidy for job stability	Grant
55	Commercial Committee Support Fund	Grant
56	Tianjin Municipal Bureau of Commerce July 2018-December 2018	Grant
57	Aiding fees for cases of technology information collection	Grant
58	Patent supporting fund from Science and Technology Bureau of Jinghai District 2019	Grant
59	Patent supporting fund for 2017 program	Grant
60	Subsidy for patent from Science and Technology Bureau Fengnan District, Tangshan City	Grant
61	Subsidy for Energy collection from the Tangshan Quality and Technology Supervision Bureau	Grant
62	Award to the Patent Innovation from Science and Technology Bureau Fengnan District	Grant
63	Technical innovation subsidy for deducting equipment and boiler	Grant
64	Awards to technology innovation from Bureau of Industry and Information Technology Fengnan District	Grant
65	Awards to "Well-Known Trademarks" from Hebei Province Market Supervision administration Bureau	Grant
66	Grant for Technology ERP	Grant
550-2	Loan interest subsidy	Preferential loan
590-1	Hebei Province Quality Awards.	Grant

I-1 General

1. Complete the worksheet named “I-1 Company turnover” A:Completed
   - This worksheet is a table of the total company revenue over the period and split into:

- Total revenue for Australian sales, domestic sales and third country sales
- Revenue of the goods for Australian sales, domestic sales and third country sales

- You must provide this table in electronic format using the template provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.

I-2 Provision of goods at less than adequate remuneration

1. For all suppliers and manufacturers of raw materials listed in G-7.2 Raw material CTM", provide an explanation and any evidence to support your categorisation of whether the company is a State Invested Enterprise (SIE) A: we don't have an integrated production process, or source raw materials from a subsidiary over our company exercises control.so we don't fill the sheet G-7.2 Raw material CTM.

2. Provide copies of all contractual agreements that detail the obligations of the State Invested Enterprise (SIE) and your business with reference to the granting and receipt of any assistance/benefits. A:Not applicable

3. If your business purchased imported raw materials, explain the reason/s for your business' decision to purchase imported over domestic raw materials, including the key factors affecting the decision such as price, availability etc. A: we didn't purchase imported raw materials

I-3 Preferential tax policies

1. Complete the worksheet named "I-3 Income Tax" A:Completed
   - This worksheet is a table of your company's income tax liability over the last three financial years.
   - You must provide this table in electronic format using the template provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.

2. Provide a copy of your company's annual tax return for the last three financial years. If the documents are not in English, please provide a translation of the documents. A:Pls see file [I-3-2 annual tax return for the last [redacted] financial years]

3. Provide proof of your company's tax payments to your tax authority over the last three financial years, including any progress payments made and related forms submitted to reconcile the annual tax return. A: pls check file [I-3-3 proof of tax payments]

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

5. Did your company pay less than the general ta [redacted] r enterprises referred to in question I-3.4? If yes:
   a. What tax rate did your company pay? [redacted]
   b. Was the reduction in the tax paid or p [redacted] lated to any of the preferential income tax programs in the table at the top of [redacted] on I Countervailing above? A: Yes, the [redacted] rate arises under the High and New Technology Enterprise program
   c. What is the name of the program? A:Preferential Tax Policies for High and New Technology Enterprise, pls check on document [High-tech Enterprise Certificate] in file [I-3-5]
   d. What is the name of the authority granting your company the reduced tax rate? A:Jiangsu Provincial Department of Science and Technology, pls check on document [High-tech Enterprise Certificate] in file [I-3-5]
   e. What is the eligibility criteria to benefit from the reduced tax rate? [redacted] income tax for high-tech enterprises
   f. Provide details of the application process A: Pls check document [Application process] in file [I-3-5]
   g. Provide a copy of the blank application from. If the documents are not in English, please provide a translation of the documents. A: The application is through the website of government.
   h. Provide a copy of your company's completed application from, including all attachments to the application form. If the documents are not in English, please provide a translation of the documents. A: The application is through the website of government, so we don't have the

completed application form, but we consulted with the consultant company, and signed the contract with them. pls check document [Service Contract] in file [I-3-5].

i. Provide a copy of any confirmation or other correspondence from the authority approving your company for the reduction in tax rate. If the documents are not in English, please provide a translation of the documents. A: pls see document [High-tech Enterprise Certificate] in file [I-3-5]

j. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program. A: pls check document [Service Contract] in file [I-3-5].

I-4 Financial grants

1. Complete the worksheet named "I-4 Grants" A:Completed
   - This worksheet is a table of the grants received by company over the period plus the two preceding years.
   - You must provide this table in electronic format using the template provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.

2. Provide a copy of your company's non-operating income and/or other business income ledgers, extracted directly from your accounting system, for the period covering the period plus the 2 preceding ye[redacted] k th[redacted]-operating income and other business income ledgers]. for the grant of[redacted] and[redacted] on 1st. July 2[redacted] they are in the same ledger in our finance record, ki ocu rant 20230701] for details.

3. Did your company receive any grants (or any other financial contribution) from any level of government during the period plus the two preceding years? A: pls check the questionnaire excel sheet [I-4 Grants] If yes:
   a. Were any of the grants related to any program listed in the table at the top of Section I above? If yes, identify the program.
   b. Were any of the grants related to programs not listed in the table at the top of Section I above? If yes, provide the names of the programs.

4. For each of the grants listed in I-4.3: A: pls check the details in questionn[redacted]et [I-4 Grants] and file [I-4-4 Authority approving and Proof of payment]. for the grant of[redacted] we don't have any confirmation or other correspondence from the authority approving t
   a. What is the name of the grant?
   b. What is the name of the authority providing the grant?
   c. What is the eligibility criteria to receive the grant?
   d. Is the grant directly related to the goods under consideration, export sales to Australia and/or export sales generally?
   e. Provide details of the application process.
   f. Provide a copy of the blank application from. If the documents are not in English, please provide a translation of the documents.
   g. Provide a copy of your company's completed application from, including all attachments to the application form. If the documents are not in English, please provide a translation of the documents.
   h. Provide a copy of any confirmation or other correspondence from the authority approving the grant. If the documents are not in English, please provide a translation of the documents.
   i. Provide proof of payment of your company receiving the grant (e.g. bank statements).
   j. Provide a copy of the accounting journal entries relating to the grant.
   k. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the grant.

I-5 Preferential loans

1. Complete the worksheet named "I-5 Preferential Loans" A:Completed
   - This worksheet is a table of all loans with a balance during the period.
   - You must provide this table in electronic format using the template provided.
   - If you have used formulas to complete this worksheet, these formulas must be retained.

2. Provide copies of all your company's loan/borrowing ledgers, extracted directly from your accounting system, for the period. A: pls check file [I-5-2 Loan Ledgers]

3. For each loan listed in worksheet "I-5 Preferential Loans":
   a. Provide details of the application process.
   A: 1. Consult with the customer manager
   2. Prepare materials and submit the application (company credit report, legal representative credit report, guarantor credit report, company basic information)
   3. Bank due diligence assessment (bank reviews the submitted materials)
   4. Risk control and credit approval (risk control releases the credit limit based on the enterprise situation)
   5. Handle mortgage / guarantee (provide enterprise business materials within the credit limit)
   6. Sign the contract
   7. Withdraw and disburse the loan (disburse the loan based on the amount of the business materials)
   8. Make regular repayments and conduct post-loan tracking

   b. Provide a copy of the loan contract. If the contract is not in English, please provide a translation of the contract.
   A:pls check file [I-5-3-b Loan Contract]

   c. Provide a copy of the bank statement for the period. If the statement is not in English, please provide a translation of the statement. A: Pls check file [I-5-3-c Bank Statement]

I-6 Other Programs

1. Provide a list of all the provinces in which you have business operations (including locations of factories, sales offices, or other places of business). A:Below is the list of our company's business operations about [redacted] products:

Province	City	Type of Operation	Address
Jiangsu	Jiangyin	Sales header office	No.2608 Zhen Cheng Road,Jiangyin City, Jiangsu Province, China
Jiangsu	Lianyungang	Production base	No.58，Jinghuayuan Road，Guanyun Economic Development Zone， Lianyungang City, Jiangsu Province, China
/	Tianjin	Production base	No.9, Taibo South Road, Jinghai Economic Development Zone, Tianjin

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

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

4. Indicate the type of program, for example:
   - the provision of grants, awards or prizes
   - the provision of goods or services at a reduced price (e.g. electricity, gas, transport)
   - the reduction of tax payable including income tax and VAT
   - reduction in land use fees
   - any other form of assistance.

For **each program** that you have identified, answer the following.

5. Indicate whether your company benefited from any of the listed programs during the period.

6. Indicate which goods you produced that benefited from the program (e.g. the program may have benefited all production or only certain products that have undergone research and development).

7. Describe the application and approval procedures for obtaining a benefit under the program.

8. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the Government of China in relation to the program.

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

10. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.

11. State whether your eligibility for the program was conditional on one or more of the following criteria:

    a) whether or not your business exports or has increased its exports
    b) the use of domestic rather than imported inputs
    c) the industry to which your business belongs or
    d) the region in which your business is located.

12. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.

13. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.

14. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.

15. To your knowledge, does the program still operate or has it been terminated?

16. If the program has been terminated, please provide details (including when and why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?

    If the terminated program has been substituted for by another program, identify the program and answer all the questions in Part I-6 in relation to this program.

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 A: The Chinese photovoltaic mounting system market is highly competitive, primarily driven by centralized ground-mounted power plant tenders from large energy groups (state-owned enterprises) and procurement for distributed PV projects (commercial, industrial, and residential). Over the past five years, with the advancement of China's "dual carbon" goals and the [redacted] Plan, domestic PV installation capacity has continued to grow steadily. As a result, demand for mounting systems has risen consistently, accompanied by increasing requirements for corrosion resistance, lightweight design, and customized solutions tailored to specific application scenarios.
   (b) Provide the sources of demand for the goods in the domestic market, including the categories of customers, users or consumers of the product A: Residential Photovoltaic and Tracking Mounting Systems
   (c) Provide an esti pro ion (%) of sales revenue from each of those sources of demand listed in (b) A: [redacted] and [redacted]
   (d) Describe the fa that ence 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 A: 1. Policy factors: National and local photovoltaic subsidy policies, county-wide promotion policies, and the red, yellow, and green zoning management for grid consumption directly affect the installation pace; 2. Seasonal factors: Due to the Spring Festival holiday and the restricted construction in northern regions during winter, the first quarter is usually a slack season, while the second and fourth quarters are peak installation seasons; 3. Raw material prices: Fluctuations in the prices of bulk commodities such as steel and aluminum will affect the purchasing decisions and inventory strategies of downstream customers.
   (e) Describe any market segmentations in the domestic market; such as geographic or product segmentations A: No clear regional segmentation, nationwide delivery
   (f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e) A: Not applicable
   (g) Describe the way in which domestically produced goods and imported goods compete in the domestic market A: Since photovoltaic supports are large-sized and heavy steel structure products, their transportation costs are high. China has a complete steel industry chain and mature support manufacturing capabilities. Domestic products are highly competitive in price. Therefore, there is almost no competition from imported supports in the domestic market. The main competition comes from the price and technical competition among numerous domestic support manufacturers.
   (h) Describe the ways that the goods are marketed and distributed in the domestic market and A: Our company's domestic sales mainly adopt a model combining direct sales and bidding. For large-scale projects, the company closely monitors the public bidding information of major power groups and government platforms, and participates in the bidding process. After winning the bid, it arranges production and logistics based on the specific monthly delivery instructions (Call-off orders) from the customers. For some distributed customers, the company acquires orders through industry exhibitions, recommendations from existing customers, etc.
   (i) Describe any other factors that are relevant to characteristics or influences on the domestic market for the goods. A: The domestic market is highly competitive, and customers are highly sensitive to prices. They also have high requirements for the anti-corrosion lifespan of the products (such as the application of zinc-aluminum-magnesium materials) and the ease of installation.

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.

A: The domestic market structure for the subject merchandise (PV mounting structures) is highly streamlined and predominantly driven by a direct-sales model. Due to the customized nature and high transportation costs of the product, the distribution channels are short. The market participants and trade links are categorized as follows:

Raw Material Suppliers: Steel and aluminum manufacturers, galvanizing processors, and component suppliers. They provide raw materials to the producers.

Producers (Manufacturers): Companies that design and manufacture the PV mounting structures based on specific project requirements.

End-Users / Buyers:

Large EPC Contractors & Power Investors: For utility-scale ground-mounted projects. They typically procure products through public bidding/tendering processes.

Distributed PV Developers & Installers: For commercial and residential rooftop projects. They procure products through direct negotiations or framework agreements.

Final Application: Photovoltaic power stations.

Trade and Distribution Channels:

There are no independent, multi-tiered wholesalers or retail distributors in this market. The trade link is primarily a direct connection from Producers to End-Users. Procurement is strictly demand-driven: Buyers issue tender requirements or monthly delivery schedules, and Producers manufacture and deliver the goods directly to the project sites.

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.

A: During the investigation period (1 July 2025 to 30 June 2026), the domestic PV mounting structure market in China was characterized by a concentrated competitive landscape among manufacturers, with direct sales to downstream project developers and EPC contractors. The commercially significant market participants are described below by their level of trade.

Level 1: Manufacturers (Producers)

The domestic market is dominated by a small number of large-scale manufacturers that engage in R&D, [redacted], and production. According to industry data, the top thre [redacted] cturers accounted for approximately [redacted] of total shipments in 2024, and the top ten accounted for [redacted] indicating a high degree of market [redacted] tration.

The commercially significant manufacturers during the investigation period include:

Participant Name	Level of Trade	Integration Description	Estimated Market Share
[redacted]	Manufacturer	**Vertically integrated**: Controls the full supply chain from raw materials to hot-dip galvanizing processing, with multiple production bases in Jiangsu.	[redacted]
	Manufacturer	**Vertically integrated**: Engages in R&D, design, and manufacturing of tracker and fixed mounting systems, with six global production bases.	
	Manufacturer	**Vertically integrated**: Full-category supplier covering fixed, tracker, and flexible mounting systems, with six manufacturing bases nationwide.	
	Manufacturer	**Vertically integrated**: Leverages Trina Solar's full industry chain (modules, inverters, trackers) to provide one-stop solutions.	
	Manufacturer	**Horizontally integrated**: Focuses on distributed PV mounting systems, with strong presence in overseas rooftop markets (e.g., Australia).	
	Manufacturer	**Vertically integrated**: Large-scale manufacturer with annual capacity of 60GW, covering ground, rooftop, and BIPV systems.	
	Manufacturer	**Horizontally focused**: Specializes in tracker, adjustable, and ground-mounted fixed systems, with accumulated installations exceeding 40GW.	
	Manufacturer	**Horizontally focused**: National specialized "little giant" enterprise, specializing in ground, rooftop, floating, and smart tracking systems.	
	Manufacturer	Varying degrees of integration; primarily serve regional distributed PV projects with fixed mounting systems.	

Notes on integration:

Vertical integration refers to manufacturers that control multiple stages of the supply chain, from raw material procurement (steel/aluminum) through processing (galvanizing) to final assembly and delivery. This is common among large-scale players like Guoqiang Xingsheng and Arctech, enabling cost control and quality assurance.

Horizontal integration refers to manufacturers that focus on a specific segment (e.g., distributed rooftop systems or floating systems) and may outsource certain processing steps such as galvanizing.

Level 2: Downstream Buyers / End-Users

There are no independent wholesalers or retail distributors in the domestic PV mounting structure market. The trade link is direct from manufacturers to end-users. The commercially significant buyers include:

Participant Category	Level of Trade	Description
State-owned power investment groups (e.g., SPIC, Huaneng, Huaneng, CGN)	End-User / Buyer	Large-scale utility project developers that procure mounting structures through public tendering processes.
EPC contractors	End-User / Buyer	Engineering, procurement, and construction firms that execute utility-scale and distributed PV projects on behalf of project owners.
Distributed PV developers and installers	End-User / Buyer	Companies specializing in commercial/industrial rooftop and residential PV systems, procuring through direct negotiations or framework agreements.

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. A: We don't know

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.

A: The regulatory framework governing the domestic market for PV mounting structures in China is comprehensive, covering competition policy, taxation, product standards, and customs classification. The key elements are described below.

1. Competition Policy:

The domestic PV mounting structure market operates under a competitive policy framework governed by the following laws and regulations:

（Price Law of the PRC）: Prohibits below-cost dumping, price collusion, and other unfair pricing practices.

（Anti-Monopoly Law of the PRC）: Prohibits horizontal monopoly agreements such as price-fixing, output restriction, and market division among competitors.

（Anti-Unfair Competition Law of the PRC）: Prohibits false advertising, commercial bribery, and other unfair competitive practices.

（Fair Competition Review Regulations）: Requires local governments to review policy measures that may restrict competition, preventing regional protectionism.

In [redacted], the State Administration for Market Regulation (SAMR) conducted compliance guidance sessions for the PV industry to address "involution-style" competition, explicitly prohibiting below-cost sales, bid rigging, and price collusion. The China Photovoltaic Industry Association (CPIA) issued an industry self-discipline initiative in August [redacted] calling for fair competition and quality-based procurement.

2. Taxation:

Domestic Sales VAT: PV mounting structures sold domestically are [redacted] ied as goods and subject to a [redacted] Value-Added Tax (VAT) rate. In EPC [redacted] acts, mounting structures [redacted] VAT) must be separately accounted from construction services [redacted] VAT) and design services [redacted] AT); otherwise, the highest rate may apply to the entire contract.

Export VAT Rebate: Prior to April 1, [redacted], PV mounting structures were eligible for a [redacted] export VAT rebate. Effective April 1, [redacted], the Ministry of Finance and the State Taxation Administration [redacted] ed Announcement No. 2 of [redacted], c [redacted] li [redacted] export VAT rebate for PV products (including mounting structures), reducing the rebate rate from [redacted] to [redacted]

3. Product Stan ds

PV mounting structures in the domestic market must comply with the following mandatory and voluntary standards:

National Standards (GB):

GB 50797-2024: Design requirements for PV power stations, including mounting structure selection, array spacing, and wind/seismic resistance.

GB 50009: Specifies wind and snow load 取值 standards (not less than [redacted] r return period for structural design; 50-year for foundation calculations).

GB 50017: Structural design requirements for steel mounting structures.

GB 50018: Applicable to cold-formed thin-walled steel mounting structures.

GB 50429: Applicable to aluminum alloy mounting structures.

GB 50191: Seismic design requirements for mounting structures.

Energy Industry Standards (NB/T):

NB/T 10115-2018: Specifies a 25-year design life, safety level 3, and corrosion protection requirements (e.g., hot-dip galvanized coating thickness ≥55μm for carbon steel).
NB/T 11079-2023: Testing requirements for tracking systems and mounting structures.
NB/T 10320-2019: Installation quality acceptance criteria.
Industry Standards (YB/T):
YB/T 6441-2026: Specifies dimensional tolerances, mechanical properties, and testing methods for cold-formed steel sections used in PV mounting structures. Published April 2026, effective November 2026.
Key Technical Requirements:
Design life: 25 years for the structure; 50 years for foundations.
Corrosion protection: Hot-dip galvanized coating ≥55μm (average) for carbon steel; anodizing required for aluminum.
Wind load: Designed for not less than 25-year return period wind speeds.
4. **Range of Goods (Customs Classification)**
China Customs does not have a dedicated HS code for PV mounting structures. They are classified based on material and degree of processing:

Product Description	[redacted]	Description
Steel PV mounting structures (assembled structures or complete sets of parts)		Other steel structures and parts thereof
Steel PV mounting structures (single cold-formed profiles, not assembled)		Cold-formed steel angles, shapes, and sections
Aluminum PV mounting structures		Other aluminum structures and parts thereof
Stainless steel accessories (hooks, brackets)		Hooks, eyes, and similar articles of base metal

[redacted]

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.
A: there were no absolute administrative entry restrictions (such as mandatory import licenses, exclusive production quotas, or state monopolies) for new participants entering the domestic PV mounting structure market in China. The market operates under a competitive framework governed by general industrial and commercial laws.

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:
2.
    - quality differences A:Domestic PV mounting structures show clear quality differences, mainly driven by material selection, corrosion protection, structural design, certification level and manufacturing consistency.
    -
    - price differences A:Steel material cost is a major component of mounting structure cost, and surface treatment such as hot-dip galvanizing, zinc-aluminum-magnesium coating, anodizing or fluorocarbon spraying can also increase quoted prices. Tracking systems are normally priced higher than fixed systems because they include mechanical drive units, control systems and more complex structural design.
    -
    - supply/availability differences A: Supply availability in the domestic market depends mainly on production capacity, raw material procurement, galvanizing capacity, project customization requirements and delivery location.
    - Large manufacturers usually have more stable supply because they can secure steel materials, manage long production schedules, and support large utility-scale projects.

- Regional or smaller manufacturers may offer faster delivery for standard distributed projects but may face constraints when handling large-scale or highly customized orders.
- Fixed structures generally have shorter lead times because their design and production are relatively standardized.
- Tracking structures usually require longer lead times due to structural design, drive system integration, debugging and reliability verification.
- Specialized projects, such as mountainous, coastal, floating or BIPV projects, may require additional design verification and customized components, which can affect delivery schedules.
-
- technical support differences A: High-end suppliers typically provide site-specific structural design, wind/snow load verification, foundation coordination, installation drawings, on-site guidance and after-sales support.
- Mid-range suppliers may provide standard drawings, basic BOM supply and limited technical coordination.
- Low-end suppliers often supply standard products with limited design verification or project-specific support.
- For PV mounting structures, technical support is not limited to product delivery. It also includes adaptation to terrain, roof type, corrosion environment, seismic requirements and construction conditions.
-
- the prevalence of private labels/customer brands A: For [redacted] tubes, private labels / customer brands are not common. This product is a steel raw material rather than a finished consumer product.
-
- the prevalence of premium labels and A: Premium branding is rare in this domestic market segment. Premium labels are not a key purchasing factor for buyers. Customers select ZAM square tubes mainly based on material performance, coating quality, dimensional accuracy and supply stability, rather than brand premium
-
- product segmentation.
- A: The domestic market is segmented mainly by end-use application and technical specification:
- Solar PV mounting segment: Strict requirements on corrosion resistance, dimensional tolerance and mechanical strength.
- Agricultural / greenhouse structural segment: Moderate corrosion requirements, slightly looser tolerance standards.
- General engineering & indoor structural segment: Low corrosion requirements, lowest technical thresholds.

3. Describe the end uses of the goods in the domestic market from all sources.
   - A: During the investigation period, the PV mounting structures supplied in the domestic Chinese market are exclusively utilized as the structural support and fixation systems for solar photovoltaic power generation systems. As the "skeleton" of a PV power plant, the end use of these goods is to securely support PV modules and maintain optimal orientation and tilt angles under various complex natural and climatic conditions, thereby ensuring the safe, stable, and efficient operation of the PV power stations over their designed lifespan (typically 25 years or more).
   - Based on the application scenarios and installation environments, the end uses of the goods in the domestic market are primarily categorized into the following segments:
   - 1. Utility-Scale Ground-Mounted PV Power Stations
   - This is the largest end-use segment in the domestic market. The mounting structures are used to support large-scale, centralized PV power plants, typically located in plains, deserts, or Gobi regions.
   - Fixed Mounting Structures: Widely used for standard ground-mounted projects due to their simple structure, low cost, and minimal maintenance requirements.
   - Tracking Mounting Structures: Increasingly adopted in utility-scale projects to automati [redacted] the sun's trajectory. These systems can increase power generation efficiency by [redacted] compared to fixed structures, making them highly suitable for large-scale solar ba able solar resources.

- 2. Distributed PV Power Stations (Commercial & Industrial Rooftops)
- Mounting structures in this segment are used to support PV systems installed on the rooftops of factories, logistics parks, commercial buildings, and public facilities.
- Metal Rooftop Systems: Specialized clamp-type mounting structures are used on color-steel tile roofs, which are installed without drilling to prevent roof leakage.
- Concrete Rooftop Systems: Ballasted or chemically anchored mounting structures are used on flat concrete roofs.
- BIPV (Building-Integrated Photovoltaics): Mounting structures are integrated into the building envelope, serving both as a structural support for PV modules and as a functional building material (e.g., solar carports, solar canopies).
-
- 3. Residential Rooftop PV Systems
- In this end-use segment, lightweight and easy-to-install mounting structures are used for household rooftop PV systems, typically installed on residential villas or rural housing. These systems are highly price-sensitive and primarily utilize standardized fixed mounting structures or adjustable brackets.
-
- 4. Special Application Scenarios (PV+ Composite Projects)
- With the promotion of diversified green energy models, mounting structures are increasingly used in specialized environments that require customized structural designs:
- Agricultural/Fishery PV Integration (Agrivoltaics & Aquavoltaics): High-span flexible mounting structures (using high-strength steel cables) or elevated fixed structures are used to support PV modules above farmlands or fishponds, allowing simultaneous agricultural/fishery production and power generation underneath.
- Floating PV Systems: Specialized floating mounting structures (using HDPE floats and anti-corrosion materials) are used to support PV modules on water surfaces such as reservoirs, mining subsidence areas, and sewage treatment plants.
- Complex Terrain Projects: Adjustable or single-column mounting structures are used in mountainous or hilly areas to adapt to uneven terrain and varying slopes.
- Extreme Environment Projects: High-corrosion-resistant (e.g., high-zinc-layer galvanized or aluminum alloy) and high-wind-resistance mounting structures are specifically designed for coastal areas, salt-alkali lands, and typhoon-prone regions.
- End Uses of Goods Produced by Our Company
- The PV mounting structures produced by our company are primarily used in the aforementioned utility-scale ground-mounted projects and special application scenarios. Our products, including fixed/adjustable and tracking structures, are designed to meet the stringent structural and anti-corrosion requirements of large-scale power investors and EPC contractors, and have been successfully applied in demanding environments such as desert and coastal projects.

4. 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.
A: purchasing decisions in the domestic market for PV mounting structures were influenced by a combination of technical, commercial, and operational factors. The relative importance of these factors varies by customer type

5. Identify if there are any commercially significant market substitutes in the domestic market for the goods.
A: We don't know

6. 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.
A: Over the past five years, the consumer preferences in the domestic photovoltaic support market have undergone significant changes. The overall trend has shifted from a single "price-oriented" approach to a "life cycle cost (LCOE)-oriented" approach, and has shown four core transformations: technological intelligence, lightweight materials, diversified application scenarios, and comprehensive procurement decision-making.

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.

A: The domestic market plays a strategically important but secondary role in our company's overall operations. While the overseas market constitutes the primary revenue and profit driver, the domestic market serves as an important complementary segment that provides market diversification, localized customer support, and a foundation for domestic brand recognition.

(a) Proportion of Sales Revenue from Domestic Market

According to our company's 2025 Annual Report, t[redacted] stic market accoun[redacted] of total sales revenue, while the overseas market accounted for [redacted] (with the remaining [redacted] d as supplementary/other).

[redacted]erms, domestic sales revenue in [redacted] was approximately [redacted] ared to [redacted] from overseas markets, out of a total consolidated revenu[redacted] c revenue is generated primarily from:

Fixed and adjustable PV mounting structures for ground-mounted and distributed projects

Wind power equipment components for domestic wind turbine manufacturers

Fastener products for domestic industrial customers

(b) Proportion of Profits from Domestic Market

The domestic market contributed appro[redacted] he company's gross profit in [redacted] with domestic gross profit amounting to approximately [redacted]

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.

A: No, our company's prices in the domestic market are not at a leading level. We are a price follower rather than a price leader in the domestic PV mounting structures 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 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.

A: Cost-Plus Pricing

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.

A: our domestic pricing process is a systematic, multi-step procedure that begins with customer inquiry receipt, proceeds through technical specification review and detailed cost calculation, incorporates market competition analysis, undergoes internal review and approval, and concludes with customer negotiation and price finalization. The process is fundamentally anchored in cost-plus calculations

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.

A: We reviewed the price by each project. Out cost calculation department will calculate the cost, and then our boss will review the price.

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 4
- Purchase price of raw materials[redacted]
- Cost to make and sell the good[redacted]
- Level of inventory[redacted]
- Value of the orde[redacted]
- Volume of the or[redacted]

- Value of forward orders 9
- Volume of forward orders 10
- Customer relationship managemer[redacted]
- Supplier relationship management[redacted]
- Desired profit[redacted]
- Brand attribut[redacted]
- Other [please define what this factor is in your response]

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? A: Our selling prices are fundamentally anchored to our costs to make and sell, but the precise relationship varies across product categories due to differences in competitive dynamics, customer concentration, and product differentiation. the selling price is tightly compressed against the cost to make and se[redacted]ting in a significantly narrower margin. Our domestic PV segment achieved a gross margin of only [redacted] in 2025, down [redacted] percentage points from [redacted], reflecting intensifying domestic price competitio

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.
A: Yes, for some orders, we offered the price reductions, but it's not for reducing price purpose, it's to get our account payable early, and we did the cash discount.

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. A: No, we don't

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.
A: Yes, customer sales volume and order size do affect our selling prices in the domestic market. However, the extent of this influence varies across product categories and is always constrained by our cost floor and minimum margin requirements. The relationship between volume and price is not a simple linear discount but a structured approach that considers both the economies of scale in manufacturing and the strategic importance of the customer relationship.

11. Does your organisation/business entity use sales contracts in the domestic market? If yes: A: Yes
    (a) What pro[redacted] of your sales revenue would come from contracted sales versus uncontracted sales? A:[redacted] contracted sales
    (b) Do you of[redacted]lusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts? A: No
    (c) How frequently are sales contracts renegotiated? A:[redacted]
    (d) How frequently are price reviews conducted between contracts? A:[redacted]
    (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. A: No, we don't
    (f) Do changes in your costs to make and sell enable you to review prices for customers within contracts? A: No, there doesn't
    (g) Provide a list of the customers under contract during the investigation period and copies of the two largest contracts in terms of sales revenue. Provide a complete translation of the documents. A: Pls check the contract in file [D-3 Sample domestic sales documents]

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.
A: Our company does not use standard published price lists for the goods sold in the domestic market. Instead, all domestic selling prices are determined on a project-specific or order-specific basis through a structured quotation process.

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.
A: Generally, we calculate the cost of our products based on the cost of raw materials of different thicknesses. We will obtain a tonnage price, and then convert this tonnage price into the individual prices for different specifications.
14. Do you tier or segment your domestic customers for the goods in terms of pricing? If yes, provide:
    (a) a general description of how this is done
    (b) list the factors that influence pricing differentiation in different tiers or segments and
    (c) explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

Provide copies of internal documents which support your claims in response to this question.
A: No, we don't

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.
A: No, we don't sell the goods to related entities in the domestic market.

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.).
A: Joining the solar fair, visit old customer, and we have our own website to do the advertisement. We market the goods in domestic market by leveraging "wind power customer resources" to drive the photovoltaic business, and establishing trust through quality certifications and qualification barriers.

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.
A: No, we don't

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.
A: We didn't do the domestic advertising, but we have brochures, we distributed in the solar fair, and we have one website: https://www.zjavim.com/

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.
A: There are around [redacted] in our domestic market sales team, and they are located in our headquarter: [redacted] city. They are offered by our company.

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.
A: Cost breakdown. Pls check document [J-4-5 cost breakdown]

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: Our company is a producer/manufacturer. The sales in the Australian market are accomplished through intermediaries/trade partners, and we do not sell directly to Australian end customers. The following reply is based on the information we have obtained.

   (a) Provide an overall description of the Australian market for the goods which explains its main characteristics and trends over the past five years
   A: The products we sell to Australia are mainly [redacted] diameter [redacted] round pipes. These are components of photovoltaic supports. As we understand, in the past five years, the demand from customers for [redacted] pipes has been decreasing, while the demand for zinc-aluminum-magnesium material pipes has been increasing.

   (b) Provide the sources of demand for the goods in Australia, including the categories of customers, users or co[redacted]the product
   A: Our client is [redacted] which later changed its name to [redacted] They purchase [redacted] diameter HDG from us for the support parts of [redacted] power stations. Regarding their users and consumers, we are not clear. Usually, power stations or EPCs would purchase solar support structures.

   (c) Provide an estimated proport[redacted]) of sales revenue from each of those sources of demand listed in (b) A: It accounts for [redacted] of our company's photovoltaic support structures' exports to the Australian market.

   (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
   A: We think that it may be affected by fluctuations in exchange rates, steel prices, and government policies.

   (e) Describe any market segmentations in Australia; such as geographic or product segmentations
   A: The product is a round pipe with a diameter of [redacted] m.

   (f) Provide an estimated proportion of sales rev[redacted]om each of the market segments listed in (e)
   A: The [redacted] diameter round tubes account for [redacted] of the photovoltaic supports we sell to Australia.

   (g) Describe the way in which Australian manufactured and other imported goods compete in the Australian market A: As our company is a manufacturer, the sales in the Australian market are handled through intermediaries and we do not sell directly to Australian end customers. Therefore, we are not aware of the details.

   (h) Describe the ways that the goods are marketed and distributed in the Australian market and
   A: As our company is a manufacturer, the sales in the Australian market are handled through intermediaries and we do not sell directly to Australian end customers. Therefore, we are not aware of the details.

   (i) Describe any other factors that are relevant to characteristics or influences on the market for the goods in Australia.
   A: As our company is a manufacturer, the sales in the Australian market are handled through intermediaries and we do not sell directly to Australian end customers. Therefore, we are not aware of the details.

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.

A: Market Structure Overview： Manufacturer→ Reseller → EPC/Contractor → End User

3. Describe the commercially significant market participants in the Australian market for the goods at each level of trade over the investigation period. In :
   - names of the participants A: JZNEE,
   - the level of trade for each market part rer, reseller, original equipment er (r, corporate stationer, importer, etc.) A: JZNEE is the exporter, and are the reseller
   - n of of integration (either vertical or horizontal) for each market participant and

   A: JZNEE - Exporter / Manufacturer, upstream integration (raw materials), downstream integration distribution), (formerly known as - Reseller / Distributor, upstream integration of h and development ration of manufacturing, downstream integration of distribution and sales.
   - an estimation of the market share of each participant.

   A: We are not clear about this

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 Regarding the specific market share of o precise independent statistics resent; however, it can be verified that its parent company, (formerly has consistently ra st e global market share of tra several c ars (approximately - in , and approximately - in and Australia is one of the official c i markets listed by it.

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.

A: **Competition Policy:**

The Australian market is governed by the Competition and Consumer Act 2010 (Cth) (CCA), which is administered by the Australian Competition and Consumer Commission (ACCC). The CCA prohibits anti-competitive conduct, including cartel behavior (such as price-fixing and market sharing), misuse of market power, and exclusive dealing that substantially lessens competition. This framework ensures that all market participants, including importers and domestic manufacturers of the subject goods, compete on a level playing field based on price, quality, and service.

Taxation:

Key points of Australia's tax policy on photovoltaic s ructures: 1. Import Tariff (MFN Most-Favored-Nation Rate): For steel products, the general rate is
China-Australia Free Trade Agreement (ChAFTA): ducts have achieved zero tariffs (require a certificate of origin).
Regional Comprehensive Economic Partnership (RCEP): Also offers or reduced tariffs. 2. Anti-dumping Tax (AD) - Core Risk Case No. 717 HSS Case: The HS codes involv over
Latest ruling in June 2026: Photovoltaic trackin tem torsion tubes/hollow steel sections are facing a cumulative combined tax rate of approximately (AD + CVD).
Expiration date of current measures: July 3, 20 he third sunset review has been initiated). 3. Anti- Tax (CVD) Only applicable to China, and the combined tax burden after added with AD can reach

t Standards:

Australia enforces a rigorous and comprehensive standards framework for structural steel products. The foundational product standard is AS/NZS 1163:2016, which specifies the manufacturing and supply requirements for cold-formed structural steel hollow sections, covering grades. Compliance with this standard is typically a prerequisite for market access. Structural design requirements are governed by AS 4100:2020, which is referenced as a mandatory standard under the

National Construction Code (NCC). The NCC, administered by the Australian Building Codes Board (ABCB), provides the overarching regulatory framework enforced across all states and territories.
Manufacturing and installation standards are equally stringent. AS/NZS 5131:2016 defines four construction categories (CC1 to CC4) based on risk and mandates ISO 3834 certification for fabrication facilities. Welding standards under the AS/NZS 1554 series require documented Welding Procedure Specifications (WPS) and qualified welders. Additional standards cover structural steel materials (AS/NZS 3678/3679) and protective coatings (AS/NZS 4680), including hot-dip galvanizing thickness requirements. Furthermore, the National Structural Steelwork Compliance Scheme (NSSCS), administered by the Australian Steel Institute (ASI), serves as a critical third-party quality assurance and certification mechanism recognized throughout the industry.

Range of Goods:

The Australian market for HSS encompasses a diverse range of products tailored to various structural applications. The primary categories include Circular Hollow Sections (CHS), with outer diameters ranging from 114.3 mm to 1142.2 mm and wall thicknesses from 6 mm to 50.8 mm. Square Hollow Sections (SHS) are available in two principal size ranges, distinguished by a perimeter threshold of 279.4 mm.

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).

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

A: 1. Resource ownership

Solar mounting structures are mainly manufactured from carbon steel.

- Australia's mineral resources (bauxite, iron ore) are owned by state/territory governments. New entrants cannot obtain mineral rights simply by purchasing land; mining tenements require state approval.
- Foreign Investment Review Board (FIRB) screening applies if foreign new entrants intend to acquire Australian local metal mills, fabrication plants or resource assets. Transactions above statutory thresholds or investment by state-owned investors must obtain FIRB approval.
- Impact for [redacted] exporters: Most overseas new entrants do not need Australian mineral ownership, as they manufacture offshore and import finished brackets. But if they plan local manufacturing in Australia, FIRB review and state resource approvals become a barrier, increasing investment uncertainty and compliance costs.

2. Patents and copyright

- Patents: Existing Australian patents may cover special bracket structures, quick-install locking mechanisms, corrosion-resistant coating systems. Patent holders can sue for infringement and block import of infringing PV mounting products. New entrants must perform Australian IP clearance before export, or obtain patent licence.
- Registered design rights: Critical for solar bracket shape, profile and assembly layout. Australian registered design can prevent competitors from importing identical or substantially similar mounting systems.
- Copyright & trade mark: Copyright applies to engineering drawings, BOM, installation manuals. Trade marks protect brand names for mounting products. Australian Border Force can detain IP-infringing imports upon IP owner's request.
- Anti-dumping relevance: IP rights are not anti-dumping measures, but established local manufacturers often use IP to raise competitor costs, which can be cited as part of industry injury evidence in ADC dumping investigations.

3. Licences

Solar mounting brackets themselves do not require a dedicated import permit into Australia. However, related licences and certifications are mandatory for market access:

1. Structural engineering certification: PV mounting must comply with AS/NZS 1170.2 wind load standard. Cyclone regions (C/D wind zones) require site-specific engineering certificates by Australian registered engineers. This is a de facto licence requirement.
2. Biosecurity compliance: Wooden packaging/pallets must carry ISPM15 heat treatment mark; non-compliant timber packaging will be fumigated or destroyed at importer's cost.

3. State building permits: Installers need state building approvals when installing the brackets on roofs/ground. While the exporter does not hold this permit, the product must meet building code requirements to be accepted by installers.
4. No mandatory CEC listing for mounting brackets (CEC list applies to modules/inverters only).

- Impact: New entrants need to prepare Australian engineering reports before sales. Certification cost and lead time act as market entry hurdles.

4. Entry barriers

Apart from legal permits, new entrants face multiple commercial & technical barriers, which are relevant to material injury assessment in anti-dumping cases:

1. Structural standard barrier: AS/NZS 1170.2 wind classification, corrosion standards (AS/NZS for aluminium/steel). Generic overseas test reports are usually not accepted; local engineering review is required.
2. Established supply chain: Existing suppliers have long-term contracts with Australian solar EPCs, installers and distributors. New entrants need time to build trust and local after-sales support.
3. Capital barrier: Tooling for aluminium extrusion, product testing, engineering certification, local warehousing and insurance require large upfront capital.
4. Anti-dumping duty risk: If ADC initiates dumping investigation on aluminium extrusions (raw material for solar brackets) or finished mounting structures, provisional and final anti-dumping/count [redacted] g duties may be imposed. Duties can be high (for aluminium extrusions, rates can reach more than [redacted] which drastically raises landed cost and blocks new entrants.
5. Currency, logistics and warranty risk: Australian customers require long-term corrosion and structural warranty; overseas new entrants need local liability coverage.

5. Import restrictions

Administered by Australian Border Force (ABF):

1. Customs tariff: Alum [redacted] solar mounting HS7610.90 MFN tariff [redacted] under ChAFTA with valid Form E Certificate of Origin. [redacted] GST applies on all imports.
2. Anti-dumping & countervailing duties: This is the most important import restriction in this questionnaire. ADC may impose dumping duties on finished PV mounting or aluminium extrusion raw materials. Dumping duty is additional to customs tariff and GST. Once measures are in force, new entrants must pay the duty or be excluded from market.
3. Labelling requirements: Commerce (Trade Descriptions) Act requires English country-of-origin marking and true product description.
4. Border inspection: ABF may inspect goods for IP infringement, false origin marking, non-compliant timber packaging. Non-compliant goods can be detained, returned or forfeited.

- Impact: Anti-dumping duties directly change the landed cost competitiveness of new overseas entrants. Even if the finished bracket itself is not under dumping measure, anti-dumping duties on aluminium extrusions increase raw material cost.

6. Government regulations

1. ADC Anti-Dumping System (core for this questionnaire) Under Customs Act 1901, Australian Anti-Dumping Commission investigates dumped or subsidised imports. Local solar bracket manufacturers may lodge dumping complaints, alleging low-priced imports cause material injury to domestic industry.

- If dumping and material injury are confirmed, final anti-dumping duties are imposed.
- Impact: Anti-dumping regulation protects domestic manufacturers. It creates a major contingent market entry restriction for new foreign entrants. The exporter must cooperate with ADC questionnaire [redacted] provide sales cost data, otherwise ADC may apply adverse facts available and assign high duty rate.

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.

A: Generally describe the range of the goods offered for sale in the Australian market. We only supply [redacted] round steel tube to the Australian market, which is the sole product under consideration.
· Quality differences: We provide products with consistent quality, manufactured in accordance with agreed material standards. There is no multiple quality tier for this [redacted] round tube in our Australian sales.
· Price differences: Prices vary mainly based on order quantity, delivery terms and shipment schedule. No separate price tiers for different quality grades.
· Supply/availability differences: We maintain stable production capacity. Supply lead time depends on order volume and production schedule. No shortage restriction for normal orders.
· Technical support differences: We provide unified technical support including material certificates, dimension inspection reports and product specification documents for all customers. No differentiated technical service packages.
· Private labels / customer brands: We do not use private labels or customer brands for this product sold to Australia.
· Generic or plain labels: The product uses standard plain marking only, no decorative branding.
· Premium labels: No premium labels are applied on our goods.
· Product segmentation: We only offer one type of [redacted] round tube to Australia, and do not split this product into different market segments.

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

A: It's used as solar mountain bracket in solar farm.

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.

A: For the [redacted]circular hollow steel tube (CHS) sold into the Australian market, the key attributes affecting purchasers' buying decisions, ranked from most important to least important, are set out below:
Material compliance and dimensional conformance As the product is used for structural fabrication, buyers require the steel to meet the specified material standard, with consistent outer diameter, wall thickness and straightness. Non-conformance will result in rejection of the goods. Valid mill test certificates are essential to prove material compliance.
Total landed cost Once suppliers meet the required specification, landed cost is the primary commercial consideration. Buyers compare total costs across competing suppliers.
Supply reliability and lead time certainty Purchasers rely on predictable delivery schedules to align with construction and fabrication project timelines. Consistent supply and on-time shipment are critical to avoid project delays.
Completeness and accuracy of documentation Full, accurate documentation including mill test certificates, packing lists and commercial invoices is required for Australian customs clearance and engineering compliance checks.
Surface quality The tubes should be free from heavy rust, deep indentations or major deformation. Minor surface marks are acceptable because buyers will cut, weld and apply coatings during fabrication.
Technical support Buyers occasionally require clarification on specifications or material documentation. Technical support is helpful but not a primary deciding factor for this standard commodity product.

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

A: As our company is a manufacturer, the sales in the Australian market are handled through intermediaries and we do not sell directly to Australian end customers. Therefore, we are not aware of the details.

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

A: As our company is a manufacturer, the sales in the Australian market are handled through intermediaries and we do not sell directly to Australian end customers. Therefore, we are not aware of the details.

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.

A: We are not sure, but we felt that more [redacted] material were used in the projects instead of the HDG.

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.

In responding to question 1 please provide evidence supporting calculations.

A: Pls check below chart for the sales revenue in Australia market for year [redacted],
for the profit, we didn't calculate base on country. Usually, the profit for solar bracket will not exceed [redacted] of the sales revenue.

Year	Sales to Australia (RMB)	JZNEE whole revenue(RMB)	Percentage
[redacted]			

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.

A: No, our company's prices in the Australian market are not at a leading level. We are a price follower rather than a price leader in the Australian PV mounting structures market. We don't know the name(s) of price leaders in Australian market.

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

A: Cost-Plus Pricing

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.

A: our selling prices of the goods for the Australian market is a systematic, multi-step procedure that begins with customer inquiry receipt, proceeds through technical specification review and detailed cost calculation, incorporates market competition analysis, undergoes internal review and approval, and concludes with customer negotiation and price finalization. The process is fundamentally anchored in cost-plus calculations. For how pricing is determined, pls check document [K-3-4 Calculation process]

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.

A: We re [redacted] price by each project. Out cost calculation department will calculate the cost, and then our boss: [redacted] will review the price.

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 4
   - Purchase price of raw materials [redacted]
   - Cost to make and sell the goods
   - Level of inventory
   - Value of the orde
   - Volume of the ord
   - Value of forward
   - Volume of forwar

- Customer relationship management 5
- Supplier relationship management 11
- Desired profi[redacted]
- Brand attribu[redacted]
- Other [please define what this factor is in your response]

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.

A: The selling price of the subject [redacted] is set based on the full cost of manufacture plus export-related selling expenses (including packing, domestic transport, port charges, ocean freight, insurance and relevant administrative overhead), taking into account competitive conditions in the Australian structural steel market. The sales price is established with reference to raw material prices, production efficiency, order volume and target gross margin.

The Company maintains its expected gross profit margin for sales of this product to Australia. Pricing decisions are made with the objective of achieving the target expected margin on each export contract. The selling price is normally above the full manufacturing and selling cost. When steel raw material prices fluctuate sharply, the Company adjusts quotation prices accordingly to protect the expected profit margin.

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. A: No, we didn't

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. A: No, we don't

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.

A: Yes, customer sales volume and order size do affect our selling prices in the Australian market. However, the extent of this influence varies across product categories and is always constrained by our cost floor and minimum margin requirements. The relationship between volume and price is not a simple linear discount but a structured approach that considers both the economies of scale in manufacturing and the strategic importance of the customer relationship.

11. Does your organisation/business entity use sales contracts in the Australian market? If yes: A: Yes
    (a) What prop[redacted] of your sales revenue would come from contracted sales versus uncontracted sales? A: [redacted]
    (b) Do you off[redacted]lusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts? A: No, we don't
    (c) How frequently are sales contracts renegotiated? A: [redacted]
    (d) How frequently are price reviews conducted between contracts? [redacted]
    (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. A: No, we don't
    (f) Do changes in your costs to make and sell enable you to review prices for customers within contracts? A: No, there doesn't
    (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. A: Pls check the contract in file [B-3 Sample export documents]

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.

A: Our company does not use standard published price lists for the goods sold in the Australian market. Instead, all Australian selling prices are determined on a project-specific or order-specific basis through a structured quotation process.

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.
A: Generally, we calculate the cost of our products based on the cost of raw materials of different thicknesses. We will obtain a tonnage price, and then convert this tonnage price into the individual prices for different specifications.

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

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

A: No, we don't

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.

A: No, we don't sell the goods to related entities in the 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.).

A: Joining the solar fair, visit old customer, and we have our own website to do the advertisement.

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.

A: No, we don't

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.

A: We didn't do the Australian advertising, but we have brochures, we distributed in the solar fair, and we have one website: https://www.zjavim.com/

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.

A: There are around [redacted] people in our Australian market sales team, and they are located in our headquarter: [redacted] city. They are offered by our company.

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.

A: Cost breakdown. Pls check document [J-4-5 cost breakdown]

EXPORTER'S DECLARATION

I hereby declare that JIANGSU ZHENJIANG NEW ENERGY EQUIPMENT CO., LTD have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this questionnaire is complete and correct to the best of my knowledge and belief.

Name: [redacted]

Signature:

[redacted]

Position in Company: [redacted]

Date: 2026/09/23

APPENDIX
GLOSSARY OF TERMS

This glossary is intended to provide you with a basic understanding of technical terms that appear in the questionnaire.

Adjustments

To enable a fair comparison between the export price and the normal value Australian legislation provides for the adjustment of the domestic price paid for like goods. Adjustments are made to account for sales occurring at different times, specification differences, and differences in the terms or circumstances of the sales. The adjustment to the normal value may be upward or downward. Areas where you believe an adjustment is necessary should be identified. Section E of the questionnaire refers.

Examples of adjustments that may be made include: s*ales occurring at different times*
(it is sometimes necessary to compare domestic and export sales made at different times - in these circumstances an adjustment may be made to reflect price movements during that time); s*pecification differences; packaging; taxes; level of trade; advertising; after sales services; inland freight; warehousing; export charges; credit terms; duty drawback; commissions.*

Adjustments may also be required where the normal value is based on costs to make and sell.

Arms length

Sales are not considered to be at "arms length" on your domestic market if there is any consideration payable for the goods other than their price, or there is an association between the buyer and the seller which affects the price, or there will be a reimbursement, compensation or benefit for, or in respect of, the price.

Constructed value

In cases where prices paid for like goods sold in the country of export cannot be used for the determination of normal value, i.e. when there are no or insufficient sales or where such sales were not made in the ordinary course of trade, normal value may be based on a constructed value. Constructed value is calculated on the basis of the cost of production of the goods under consideration plus a reasonable amount for selling, general and administration costs, and for profits, that are associated with sales on the domestic market of the country of export.

Cost of production/manufacturing

The cost of production or manufacture consists of all manufacturing costs associated with the goods. It is the sum of direct materials, direct labour and factory overheads.

Cost to make and sell

The cost to make and sell is the sum of the cost of production or manufacture, and the selling, general and administration costs associated with the sale of those goods.

Country of origin

The country in which the last significant process in the manufacture or production of the goods was performed.

Date of sale

The commission will normally use the invoice date as recorded in the exporter or producer's records. Another date may be used if this better reflects the material terms of sale. The questionnaire directs attention to matching data sets of domestic and export sales where some other date is used, as well as matching cost information. Note that any date of sale claim, other than the invoice date, that is made after submitting a response to this questionnaire may not provide the commission with sufficient time to assess the claim and may not be considered.

Direct labour cost

Direct labour is categorised as a variable cost, i.e. the value varies with the level of production.

Dumping

Dumping occurs when the products of one country are exported to another country at a price less than their normal value.

Dumping margin

Where the export price is less than the normal value the dumping margin is the amount of the difference. It can be expressed as a value or as a percentage of the export price.

Export price

The export price of the goods is usually the price paid or payable to the exporter in arms length transactions, in most instances calculated at the Free on Board (FOB) level.

Exporting country

The country of export is normally the country of origin from which the goods are shipped. The country of export may be an intermediate country, except where the products are merely transhipped through that country, or the products concerned are not produced in that country, and there is no comparable price in that country.

Factory overheads

Factory overheads consist of variable costs e.g. power, supplies, indirect labour and fixed costs e.g. factory rent, factory insurance, factory depreciation etc.

Goods under consideration (the goods)

The goods to which the application for anti-dumping action relates. That is, the goods that you have exported to Australia allegedly at dumped prices.

Incoterms

The following abbreviations are commonly used (comment is provided concerning costs that are normally borne by the seller):

EXW	ex works (the seller's minimum obligation as costs relate to goods being made available at the sellers premises)
FCA	free carrier (main carriage not paid by seller. Pay costs until such time that the goods have been delivered at the named point into custody of a carrier named by the seller. Customs formalities, taxes etc. paid if required)
FAS	free alongside ship (main carriage not paid by seller. Deliver the goods alongside the ship)
FOB	free on board (main carriage not paid by seller. Deliver the goods on board, provide export clearance if required, pay loading costs to the point the goods have passed the ship's rail, pay customs formalities, taxes etc. payable upon exportation)
CFR	cost and freight (main carriage paid by seller. Pay all costs until delivered as well as freight, loading and unloading, pay customs formalities, taxes etc. payable upon exportation)
CIF	cost, insurance and freight (main carriage paid by seller. Pay all costs as under CFR as well as marine insurance) the terms CFR and CIF are only used where goods are carried by sea or waterway transport
CPT	carriage paid to
CIP	carriage and insurance paid to the terms CPT and CIP are used as alternatives to CFR and CIF where the goods are carried by air, road, rail etc.
DAF	delivered at frontier (goods carried by rail or road and cleared for export at the named place

	at the frontier. Pay costs until delivered at the frontier plus any discharge costs incurred to place the goods at the customer's disposal)
DES	delivered ex ship (goods made available to the buyer on board the ship uncleared for import at the named port of destination. Pay all costs incurred in placed at the disposal of the buyer, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDU	delivered duty unpaid (Pay all costs for carriage to the agreed point, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDP	delivered duty paid (goods made available at the named place in the country of importation – all risks and costs being incurred by the seller including duties, taxes etc. incurred upon importation)

The period

A period defined by the commission over which importations of the goods are examined.

Like goods

Like goods are goods sold on the domestic market of the country of export (or to a third country) that are identical in all respects to the goods or that, although not alike in all respects have characteristics closely resembling those of the goods. The term 'like goods' also refers to the goods produced by the Australian industry allegedly being injured by dumped imports.

Normal value

Australian legislation sets out several ways to assess "normal value".

The preferred method is to use the price paid for like goods sold for domestic consumption in the country of export. Usually, these sales are made by you, but there may be circumstances where it is appropriate to use sales made by other sellers on the domestic market.

Sale prices must be at arms length and in the ordinary course of trade. In the absence of relevant or suitable domestic sales, the normal value may be determined by constructing a price based on all costs to make and sell the goods, and an amount for profit. Alternatively the normal value may be ascertained using the price paid for like goods sold in the ordinary course of trade at arms length to customers in a country other than Australia, however this option is rarely used.

Finally, when a normal value cannot be ascertained by any of the above methods, or if no information is provided, the commission will determine the normal value by considering all the relevant information, including the applicant's information. This allows the applicant's information to be used where sufficient information has not been furnished or is not available.

Where domestic price generally, and the trade of the exporting country are determined or substantially influenced by the government of the exporting country, an alternative/surrogate market economy is selected by the commission and the normal value is determined as if the surrogate country were the export source.

Ordinary course of trade

Testing for "ordinary course of trade" includes a comparison of the selling price and the unit cost to make and sell for the same period. If sales in respect of a substantial quantity of goods over an extended period of time, usually 12 months, do not recover all costs and these losses are not likely to be recovered within a reasonable period of time, (again usually 12 months) then the sales are regarded as being not in the ordinary course of trade.

There may be circumstances where it is appropriate to use a period other than 12 months in assessing whether sales are in the ordinary course of trade.

Unprofitable sales are to be take [redacted]ave occurred in substantial quantities during an extended period where the unprofitable sales amount to [redacted] or more of the total volume of sales of the goods by the exporter over the period. An extended period [redacted]e is usually taken to be a period not less than 12 months. Where unprofitable sales are rejected, normal value is based upon remaining profitable sales provided they occur in

sufficient number. Where all sales have been made at a loss, or profitable sales are insufficient, the normal value may be constructed from costs to make and sell.

Selling, general and administration expenses (SG&A)

The selling, general and administration expenses includes all selling, distribution, general and administration expenses including finance costs that would be incurred if the goods were sold for domestic consumption in the country of export. The amounts are determined in each case using all the available information and may include expenses incurred in:

- domestic sales of like goods
- sale of goods of the same general category by the exporter or
- sales in the industry in the country of export.

The expenses must, however, reflect the selling, general and administration costs of the goods. Administrative and selling expenses include: director's fees, management salaries and benefits, office salaries and benefits, office supplies, insurance, promotion, entertainment, depreciation and corporate overheads.