PUBLIC RECORD — NON-CONFIDENTIAL VERSION

SKYNET METAL TRADING CO., LIMITED
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4 November 2026

The Commissioner
Australian Trade Remedies Commission
By email: Investigations1@atrc.gov.au

Investigation 691 — Aluminium windows and doors exported from the People's Republic of China
Submission by Skynet Metal Trading Co., Limited (residual exporter) in response to the Statement of Essential Facts of 14 October 2026

Dear Commissioner

1. SKYNET AND ITS OWNERSHIP

1.1 Skynet Metal Trading Co., Limited (Skynet) is a trading company at Flat/Rm 2401, Dominion Centre, No. 43–59 Queen's Road East, Hong Kong. Skynet purchases finished aluminium windows and doors from Guangdong TTR Automation Co. Limited (TTR) and exports them to Australia, named as supplier on each commercial invoice and as shipper on each bill of lading. Skynet is listed by name as a residual exporter in SEF Table 6.

1.2 Skynet is wholly owned by Ms Rachel Gao. Skynet's ownership and its position in relation to TTR and to its Australian importers are set out in the confidential version of this submission.

1.3 In answer to question 2 of the preliminary information request, Skynet listed "TAWS" and "TTRA" as names under which the goods are supplied. These are the brand names under which TTR-made goods are marketed in Australia; they are not companies in which Skynet holds an interest.

1.4 Skynet lodged its preliminary information response on 8 December 2025. This submission is lodged in confidential and non-confidential versions. A separate submission is lodged by TTR; the two are consistent and each company speaks for its own operations.

2. EXPORT SALES IN THE INVESTIGATION PERIOD

2.1 In the investigation period (1 July 2024 to 30 June 2025) Skynet exported approximately 35,000 m² of the goods to Australia, all of it manufactured by TTR, as reported in its preliminary information response. The values of Skynet's purchases from TTR and of its export sales, and the resulting trading margin, are given in the confidential version.

2.2 Skynet sold to four Australian importers in the investigation period, three of which have no connection with TTR, Skynet or TAWS. The importers are identified in the confidential version. Since the investigation period Skynet has also supplied a further Australian importer directly.

2.3 A transaction-level schedule of these sales will be compiled and provided to the Commission on request.

3. HOW SKYNET PRICES THE GOODS

3.1 Prices are set project by project from the project's glass, extrusion, finish, thermal, acoustic and structural requirements; the same quoting method applies to every importer and the price for a given project does not vary with the identity of the importer.

3.2 Skynet's margin over TTR's price for a project is likewise determined by the project specification and not by the identity of the importer. No importer receives rebates, credits, compensation or any other benefit relating to the price, and securities taken by the Australian Border Force are not reimbursed by Skynet to any importer. Skynet's sales of the goods over the period were profitable.

4. EXPORT PRICE

4.1 Skynet's price is the FOB price of the goods. Design assistance, engineering, shop drawings, Australian logistics, storage, delivery, installation and warranty are supplied in Australia by the importer to its builder

customers and form no part of the export price. Skynet asks that the export price for these goods be determined under section 269TAB(1)(a) from Skynet's invoices to the importers.

4.2 Skynet notes that in this investigation the Commission has treated the producer as the exporter where goods were sold through a trading company, and has taken the price paid by the Australian importer to the trader as the export price (Guangdong Yuanjiang, EPR document 459; Foshan AMJ, EPR document 463). Because Skynet is the supplier named on the commercial invoice and on the import declaration, Skynet asks that both Skynet and TTR continue to be listed by name as residual exporters in the dumping duty notice, so that declarations naming either company attract the residual rate.

5. REQUESTS

5.1 Skynet has read the Commission's decisions in SEF section 2.4.3 on the requests for individual examination made for Hennissy and Pearl Facade and does not ask the Commission to repeat an exercise it has found impracticable before the final report. Skynet asks the Commissioner:

- to confirm that Guangdong TTR Automation Co. Limited and Skynet Metal Trading Co., Limited remain residual exporters, listed by those names, in the final report and in the dumping duty notice;
- to note on the record the offer of exporter-questionnaire-level data, so that any application for duty assessment by an importer of these goods under Division 4 of Part XVB of the Customs Act 1901, or any review of the measures, can proceed on verified data for these goods; and
- in relation to the residual dumping margin under section 269TACAB(2)(c) and (d), to state in the final report which selected exporters' export prices and normal values are included in the weighted averages, the basis of weighting, whether the verified data of Altop Facade Co., Ltd are included and, if not, the basis for their exclusion, and to confirm that data the Commission found unreliable (SEF section 6.10) are not included.

6. CONFIDENTIALITY

6.1 This is the non-confidential version for the public record. The confidential version lodged with the Commission contains Skynet's sales volumes and values, purchase values, trading margin and customer identities, which are summarised in general terms here.

Yours faithfully

Rachel Gao
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