Public Record

競天公誠律師事務所
JINGTIAN & GONGCHENG

广州市天河区珠江新城珠江东路 6 号广州周大福金融中心大厦 3901 房 10-12 室 邮编：510623

Units 10-12, Room 01, 39/F, CTF Finance Centre, No.6 Zhujiang East Road, Tianhe District, Guangzhou

T: (86-20) 8573 2500 F: (86-20) 8573 2501

COMMENTS ON THE STATEMENT OF ESSENTIAL FACTS AND PRELIMINARY AFFIRMATIVE DETERMINATION

IN THE DUMPING AND SUBSIDISATION INVESTIGATION ON

ALUMINIUM WINDOWS AND DOORS FROM CHINA

NO. 691

ON BEHALF OF

Altop Facade Co., Limited

JINGTIAN & GONGCHENG

2 November 2026

競天公誠律師事務所
JINGTIAN & GONGCHENG

广州市天河区珠江新城珠江东路 6 号广州周大福金融中心大厦 3901 房 10-12 室 邮编：510623
Units 10-12, Room 01, 39/F, CTF Finance Centre, No.6 Zhujiang East Road, Tianhe District, Guangzhou

T: (86-20) 8573 2500 F: (86-20) 8573 2501

On October 14, 2026, Altop Facade Co., Limited ("Altop") received the Statement of Essential Facts (SEF), the Preliminary Affirmative Determination (PAD), and the related calculation results issued by the Australian Trade Remedies Commission (ATRC, the "Commission"). We hereby express our sincere gratitude and full recognition in this regard.

First and foremost, Altop wishes to express its deep respect for the professionalism, rigor, and diligence demonstrated by the Commission throughout this investigation. During the investigation, the Commission's meticulous verification of facts and data, careful analysis of the relevant issues, and professional and pragmatic communication left a profound impression on Altop and on us. We sincerely thank the Commission for the time and effort it has devoted to ascertaining the facts in a comprehensive and objective manner.

Altop has carefully reviewed the dumping margin and subsidy margin calculation spreadsheets provided by the Commission and fully recognizes the relevant calculation results. Altop notes that the Commission has essentially accepted the data it submitted, with only certain adjustments made to the cost of aluminium extrusions. Altop accepts them.

Altop has always been committed to conducting its export business in compliance with the law and has never engaged in dumping or any other form of unfair trade practice. In this SEF and PAD, Altop's dumping margin was found to be negative, and

競天公誠律師事務所
JINGTIAN & GONGCHENG

广州市天河区珠江新城珠江东路 6 号广州周大福金融中心大厦 3901 房 10-12 室 邮编：510623
Units 10-12, Room 01, 39/F, CTF Finance Centre, No.6 Zhujiang East Road, Tianhe District, Guangzhou

T: (86-20) 8573 2500 F: (86-20) 8573 2501

its subsidy margin was found to be 1.5%, which is below the applicable de minimis threshold. Accordingly, no antidumping duty or countervailing duty will be imposed on Altop. Altop considers that this outcome fully reflects its actual situation and is a conclusion reached on the basis of ascertained facts and examination in accordance with the law. Altop welcomes this outcome and will continue to uphold the principles of good-faith operation and fair competition, strictly comply with applicable laws and regulations, ensure the continued compliance of its future export operations, and refrain from engaging in any unfair trade practices.

Based on the foregoing, Altop fully recognizes and accepts the conclusion that no anti-dumping duty or countervailing duty should be imposed. Altop respectfully request that the Commission maintain the above findings and outcome in its final determination.

Should the Commission have any further questions or require any supplementary information or clarification, please feel free to contact us at any time. We will continue to actively cooperate and provide the necessary assistance in a timely manner.

Once again, we thank the Commission for its professionalism and diligent efforts throughout this investigation.

Respectfully submitted by,

JINGTIAN & GONGCHENG

競天公誠律師事務所
JINGTIAN & GONGCHENG

广州市天河区珠江新城珠江东路 6 号广州周大福金融中心大厦 3901 房 10-12 室 邮编：510623

Units 10-12, Room 01, 39/F, CTF Finance Centre, No.6 Zhujiang East Road, Tianhe District, Guangzhou

T: (86-20) 8573 2500 F: (86-20) 8573 2501



Xinqu LUO

E: Luo.xinqu@jingtian.com

M: (86) 189 0120 5688

November 2, 2026