Foshan Zhangmenren Building Materials Co., Ltd

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Contact: __Jayron_____ ABN: ____/_____

Email: ____Jayron@zmrdoor.com_____ Tel: +86 18476269691_____

To: The Commissioner, Australian Trade Remedies Commission

Attn: Investigations 1 Team

Date: __2026.11.3_____ Reference No.: ____NO.691_____

SUBMISSION IN RESPONSE TO STATEMENT OF ESSENTIAL FACTS NO. 691 — REQUEST FOR REVIEW OF THE PRELIMINARY DUMPING MARGIN

Dear Commissioner,

We,Foshan Zhangmenren Building Materials Co., Ltd. ("Zhangmenren") hereby submit this response to the Statement of Essential Facts No. 691 (SEF 691) and respectfully request a review of our preliminary dumping margin in relation to the investigation into aluminium windows and doors exported from the People's Republic of China.

1. Cooperation with the Investigation

We have cooperated fully with the investigation from the outset and were classified as a residual exporter in the Commissioner's preliminary affirmative determination, with a preliminary dumping margin of 24.4%. We have provided the information requested of us to the best of our ability and remain fully willing to furnish any further data the Commission may require to verify our circumstances.

2. No Government Subsidies Received

We respectfully submit that, in the course of our sales to the Australian market, we have not applied for, and have not received, any government subsidy. We therefore submit that the countervailing element attributed to our exports should not apply, and request that the relevant subsidy margin be reviewed accordingly.

3. Selling Prices Above Market Level — No Dumping

Our selling prices to the Australian market have been maintained above prevailing market levels. We respectfully submit that our actual export prices do not give rise to dumping of the goods, and request that the Commission review the calculation of our

dumping margin based on our actual verified selling prices and costs, rather than on residual assumptions.

4. High-End Energy-Efficient Product Positioning

Our factory specialises in high-end thermally broken and energy-efficient system windows and doors. Our products primarily serve cold and high-insulation regions including the United States, Canada and Europe, where they have obtained recognised energy-efficiency certifications such as ENERGY STAR. These certifications demonstrate that our products meet stringent climatic and energy-saving requirements.

5. Contribution to Australian Public Interest

Our products are highly aligned with the energy-efficiency certification direction being promoted in Australia and can materially assist Australia in reducing energy waste in the built environment. In addition, the product category we supply is not currently manufactured by Australian door and window producers. Accordingly, our exports do not constitute dumping that causes material injury to the Australian industry; rather, they bring tangible energy-saving benefits to Australian consumers and the public interest.

6. Request

In light of the above, we respectfully request that the Commission review our preliminary dumping margin and take into account our full cooperation, the absence of any subsidy, our above-market selling prices, and the significant public-interest and energy-saving benefits our products deliver. We ask that a lower interim and final rate of duty — or, where appropriate, an exemption — be applied, so as to reduce the cost for Australian consumers of adopting high-efficiency window and door systems.

7. Conclusion

We are grateful for the opportunity to respond and remain committed to cooperating fully with the Commission throughout this process. We respectfully trust that our submission will be given due consideration, and we thank the Commission for its time.

Yours faithfully,

Authorized Representative: Jayron

Signature: Jayron

Title: CEO

Date: November 3rd, 2026

Company Seal (Company Chop):

