SECTION A
COMPANY INFORMATION

A-1 Company representative and location

1. Please nominate a contact person within your company:

Name: *Mr. Wei-Chiang Lin*
Position in the company: *Senior General Manager*
Telephone: *+886-7-6111488*
E-mail address: *h2146@shinyangsteel.com.tw*

2. If you have appointed a representative, provide their contact details:

Name:
Address:
Telephone:
E-mail address:

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.

The financial records of Shin Yang Steel Co., Ltd. ("Shin Yang") are kept at the head office of its parent company, Yieh Phui Enterprise Co., Ltd. ("Yieh Phui"), at the following address:

369 Yu Liao Road, Qiao Tou District, Kaohsiung, Taiwan

4. Please provide the location where your company's production records are held.

The production records of Shin Yang are kept at the head office of its parent company, Yieh Phui, at the following address:

369 Yu Liao Road, Qiao Tou District, Kaohsiung, Taiwan

5. Please provide the location of your company's production plant manufacturing the goods subject to measures.

Shin Yang has two steel pipe manufacturing factories at the following locations:

Steel Pipe Plant I

297, Yu Liao Road, Chiao Tou District, Kaohsiung, Taiwan, R.O.C.

Steel Pipe Plant II

2, Dian Chang Road, Chiao Tou District, Kaohsiung, Taiwan, R.O.C.

During the POI, both factories produced the goods under consideration ("GUC") sold both in the domestic and Australian markets. It should be noted that Steel Pipe Plant I has two pipe

forming units, i.e., Pipe Forming Section I and Pipe Forming Section III. During the inquiry period, Pipe Forming Section III was mainly engaged in the production of oil country tubular goods (internally referred to as "API" pipes by Shin Yang) and did not produce any GUC.

A-2 Company information

1. What is the legal name of your business?

   Shin Yang's legal name of business is "Shin Yang Steel Co., Ltd.".

2. Does your company trade under a different name and/or brand? If yes, provide details.

   No, Shin Yang does not trade under a name or brand other than its legal name.

3. Was your company ever known by a different legal and/or trading name? If yes, provide details

   No, Shin Yang was never known by a different legal or trading name.

4. Provide a list of your current board of directors and any changes in the last two years.

   There was no change to Shin Yang's board of directors in the last two years.

   Please see below for a list of Shin Yang's board of directors:

Position	*Name*
Chairman	[redacted]
Director	[redacted]
Director	[redacted]

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

   Shin Yang is 100% wholly owned by its parent company, Yieh Phui Enterprise Co. Ltd. ("Yieh Phui"). Please see Exhibit A-2.5-a for a diagram showing the ownership structure. Yieh Phui is a member of "E United Group" in Taiwan. "E United Group" is not a legal entity but a group of companies associated and/or under the common control of Mr. I-Shou, Lin, Yieh Phui's chairman. Other than the steel industry, E United Group is also involved in businesses such as education, health care, and real estate development. Please see Exhibit A-2.5-b for the list of Shin Yang's related companies as well as the main business scope respectively.

6. Is your company or parent company publicly listed?
   If yes, please provide:
   (a) The stock exchange where it is listed and
   (b) Any principal shareholders[1]
   If no, please provide:
   (a) A list of all principal shareholders and the shareholding percentages.

[1] Principal shareholders are those who are able to cast, or control the casting of, 5% or more of the maximum amount of votes that could be cast at a general meeting of your company.

As indicated above, Shin Yang is 100% wholly owned by its parent company, Yieh Phui. Yieh Phui was established in 1978 and listed in the Taiwan Stock Exchange in 1995. As such, the holding of each shareholder will vary from time to time in line with the shareholder's trading in the stock market. The list of the top 10 shareholders of Yieh Phui dated as of April 27, 2026 is provided in Exhibit A-2.6, which has already covered all shareholders owning more than 5% of Yieh Phui's shares.

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.

Shin Yang is a manufacturer of hot-rolled steel pipes, pre-hot-dipped zinc-coated steel pipes and post-hot-dipped zinc-coated steel pipes, with shape of circular pipes (with or without threading), rectangular pipes and oval pipes. During the POI, the goods under consideration sold by Shin Yang to Australia and in the domestic market was all produced by Shin Yang itself.

Product	***Markets sold to***
hot-rolled steel pipes of API grade	
hot-rolled steel pipes of non-API grade	
post-hot-dipped zinc-coated steel pipes	
pre-hot-dipped zinc-coated steel pipes	

Please visit Shin Yang's website for further information on the nature of Shin Yang's business: http://www.shinyangsteel.com.tw/.

8. If your business does not perform all of the following functions in relation to the goods subject to measures, then please provide names and addresses of the companies which perform each function:
    (a) produce or manufacture
    (b) sell in the domestic market
    (c) export to Australia and
    (d) export to countries other than Australia.

Shin Yang is the producer of the goods under consideration and sells to overseas and domestic markets. Nonetheless, Shin Yang also retained related and unrelated companies to provide processing services for the production of the goods under consideration during the POI. Shin Yang retained a related company to perform hot-dipped galvanizing of the hot-rolled steel coils, which were further introduced for the production of the pre-hot-dipped galvanized steel pipes. Shin Yang retained unrelated companies to perform pipe hot-dipped galvanizing. Please see Exhibit A-2.8 for a list of the processing service suppliers and the processing service performed for Shin Yang regarding the production of the goods under consideration. Please refer to Exhibit RA-2.8 for the list of related companies involved in the production, sales and export of the GUC.

9. Provide your company's internal organisation chart.

Please see Exhibit A-2.9 for Shin Yang's internal organization chart.

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

Please see Exhibit A-2.10 for the functions performed by each department.

11. Does your company produce brochures, pamphlets or other promotional material? If yes, please provide them.

Please see Exhibit A-2.11 for Shin Yang's company brochure and product catalogue.

A-3 General accounting information

1. What is your financial accounting period?

   Shin Yang's accounting period is calendar year (1 January to 31 December).

2. Are your financial accounts audited? If yes, who is the auditor?

   Yes, Shin Yang's financial accounts are audited and the auditor is Crowe (TW) CPAs.

3. What currency are your accounts kept in?

   NT$, New Taiwan Dollars.

4. What is the name of your financial accounting system?

   Shin Yang's computer system is a self-developed one using [redacted] *as the software development tool. Please see Exhibit A-3.7 for Chart of ERP System to show the modules Shin Yang uses and the functions of each module. Shin Yang's computer system is an integrated one, with various different modules in charge specific areas of the company's operations. Shin Yang's financial accounting, sales and production systems are part of Shin Yang's electronic computer system. Please see page 5 of Exhibit A-3.7 for a diagram showing the interaction among the company's accounting, sales and production systems.*

5. What is the name of your sales system?

   Please see our answers above.

6. What is the name of your production system?

   Please see our answers above.

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.

   Please see our answers above and Exhibit A-3.7 for Chart of ERP System to show the modules Shin Yang uses and the functions of each module, as well as a diagram at page 5 of the same Exhibit showing the interaction among the company's accounting, sales and production systems.

8. Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If yes, please provide details.

   Shin Yang maintained its books and records in accordance with generally accepted accounting principles in Taiwan ("Taiwan GAAP") and the International Financial Reporting Standards ("IFRS").

9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.

   No, there has been no change to Shin Yang's accounting practices or policies over the last two years.

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.

   (1) Please see Exhibit A-4.1-a for Shin Yang's audited financial statements for the year 2025 and Exhibit A-4.1-b for the year 2024.

   (2) As to the related companies which involved in the production of the GUC:

   During the POI, as stated in Exhibit A-2.8, Shin Yang retained [redacted] to perform hot-dipped galvanizing of the hot-rolled steel coils, which were further introduced for the production of the pre-hot-dipped galvanized steel pipes. In addition, Shin Yang purchased hot-rolled steel from three related companies (i.e., [redacted], [redacted] and [redacted]). Please note that except [redacted], neither of the other two related companies is the producer of hot-rolled steel in Taiwan. The audited financial statements of [redacted], [redacted] and [redacted] are provided as follows:

   Exhibit A-4.1-c for [redacted]'s audited financial statements for the year 2025 and Exhibit A-4.1-d for the year 2024.

   Exhibit A-4.1-e for [redacted]'s audited financial statements for the year 2025 and Exhibit A-4.1-f for the year 2024.

   Exhibit A-4.1-g for [redacted]'s audited financial statements for the year 2025 and Exhibit A-4.1-h for the year 2024.

   (3) Shin Yang's related companies which involved in the sales of the GUC:

   Shin Yang has one related company, [redacted], that provided seaport warehousing and stevedoring services to Shin Yang in Taiwan for Shin Yang's sales of the GUC to Australia. The audited financial statements of [redacted] are provided as follows:

   Exhibit A-4.1-i for [redacted]'s audited financial statements for the year 2025 and Exhibit A-4.1-j for the year 2024.

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.

   Not applicable, no audit management letters were issued from the independent auditor to Shin Yang because Shin Yang is not a public offering company and thus the auditor is not required to issue audit management letters.

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

   This question is not applicable, as the financial statements provided in the answer to A-4.1 are all audited.

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) the most recent financial year and
    (b) the period.

    No, Shin Yang does not maintain different profit centres. Please note that Shin Yang does not have divisional, factory/facility or product-specific income statements.

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
    (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.

    The internal income statements of 2025 and the POI is provided in Exhibit A-4.5, trial balance of 2025 and the POI is provided in Exhibit A-4.6 and chart of accounts is provided in Exhibit A-4.7.

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

    Please see Exhibit A-4.5 for the trial balance for the year 2025 and the POI.

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

    Please see Exhibit A-4.6 for the chart of accounts of Shin Yang with English translation.

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
    (b) Price determination and/or negotiation process
    (c) Order placement process
    (d) Order fulfilment process and lead time
    (e) Delivery terms and process
    (f) Invoicing process
    (g) Payment terms and process

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.

Please refer to Exhibit B-1.1-a for the flowchart of sales process to Australia market and Exhibit B-1.1-b for the distribution channels to Australia market.

The sales process typically began when Shin Yang's customers solicited detailed and formal price quotations from Shin Yang based on the intended product mix and the respective quantities. Shin Yang then responded with detailed price quotations to its customers and both parties would negotiate on the terms of sales either via phone calls or email. After the sales terms were resolved, Shin Yang then prepared the sales contract for its customer's counter-signature. Once receiving the counter-signed sales contract from the customer, an internal order memorandum was prepared by Shin Yang's sales department in the company's system for its production department. Production planning and preparation then began pursuant to the order.

After production, the goods were shipped directly from Taiwan to Australia. The commercial invoice and packing list were issued by Shin Yang to its customer at or about the time of shipment. (1) The sales to Australia during the POI were shipped in the term either FOB or FCA CY and FCA CY means "free carrier container yard". Shin Yang would ship the goods to container yard and finished the customs clearing. (2) The payment term for Australia sales is [redacted] *and arrange shipment accordingly. (3) The trade promotion fee is the fee charged by the International Trade Commission under the Ministry of Economics and retain the Customs to collect the fee from exporters (importers also need to pay the fee), rather than the fee paid for marketing and advertising activities or specifically sales to the Australian market. (4) Please refer to Exhibit RB-1.1-a Revised Flowchart of Sales Process - Australia Market that Shin Yang has included the information as instructed.*

The term of payment for Shin Yang's export sales of GUC to Australia during the POI were based on Shin Yang's standard payment term (i.e., [redacted]*).*

2. In what currency do you invoice your customers for goods exported to Australia? If it is not in your local currency:

The invoice currency is in U.S. dollars.

(a) Do your customers pay you into a foreign currency denominated account? If yes, provide details.

The customers pay Shin Yang in U.S. dollars.

(b) Do you use forward contracts to lock in the foreign exchange rate relating to the export sales? If yes, provide details.

[redacted]

(c) How is the exchange rate determined in your accounting system and how often is it updated?

The transactions for sales of Shin Yang in the foreign currency are recorded in New Taiwan Dollars at the exchange rates [redacted] *and the exchange rates* [redacted].

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.

   No, none of the Australia customers were related to Shin Yang.

4. If sales are in accordance with price lists or price extras list, provide copies of these lists.

   In the normal course of business, Shin Yang does not use price lists for its export or domestic sales. However, Shin Yang does have price guidance prepared on a monthly basis. Such price guidance is prepared by Shin Yang's sales department for the sales representatives to use as a base price in negotiating with customers. The final selling price, however, is still subject to the negotiations with customers in consideration of various economic factors such as product specifications, quantity, shipment date, market situation, etc. The price guidance for export is already provided in Exhibit K-4-5 Price Guidance for Export in September 23 submission.

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.

   Not applicable, no sales to Australia were based on projects in the POI.

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.

   No, selling prices are subject to negotiation case-by-case but not vary by distribution channel because there's only one distribution channel to Australia market, trader.

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.

   No, [redacted].

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.

Not applicable. No credit or debit notes granted to the sales exported to Australia during the POI.

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?
    (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.

Shin Yang is not making a claim that a date other than the invoice date should be used as the date of sale for the POI.

B-2 Australian sales listing

1. Complete the worksheet named "B-2 Australian sales"
    - 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 are covered by the goods description, including any goods subject to an exemption notice under subsections 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.

Please refer to Exhibit B-2.1 for Australia Sales.

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] Further details of any current exemption notices applying to the goods are available in the Hollow Structural Sections entry on the Anti-Dumping Commission's Dumping Commodity Register.

Not applicable, Shin Yang did not sell the goods to Australia through an intermediary during the POI.

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".

   Shin Yang has supplemented the relevant accounting codes in Exhibit RB-2.2 Revised Australian Sales Source

B-3 Sample export documents

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

   Please refer to Exhibits B-3.1-a and B-3.1-b for the sales documentation for the two largest invoices by value [redacted] *and* [redacted] *respectively.*

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

2. 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
   - 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.

   Not applicable, no sales to Australia were based on projects in the POI.

3. 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.

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.
   - 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.

   Please refer to Exhibit B-4-1 Upward Sales.

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.
   - For example, worksheets (e.g. a master sales listing) showing how you identified and categorised:
     - Sales of the goods subject to measures and other sales (e.g. non-goods or services)
     - Domestic, Australian and third country sales of the goods subject to measures
   - 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.

   Please refer to Exhibit B-4-2 for Supporting of Exhibit B-4-1 Upward Sales. In providing the supporting documents for Exhibit B-4-1, Shin Yang has selected one month during the POI to provide the general ledger for each sales revenue account.

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:
   - 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.

   Please refer to the answers above. Please refer to Exhibit RB-4.1-b for the supporting of B-4 Upward Sales. Please note that, to prepare the questionnaire response, Shin Yang has combined the data recorded in [redacted] and [redacted] (shipment details) in a report database [redacted].

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.

   During the POI, all of the goods exported to Australia are pre-galvanized steel pipes. The standards for the products exported to Australia and domestic markets are provided in Exhibit C-1.1.

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.

   Please see below for the list of MCCs exported to Australia.

MCC Category 1 - Prime	MCC Category 2 - Galvanising	MCC Category 3 - Finish	MCC Category 4 - Shape	MCC Category 5 - Steel grades	MCC Category 6 - Ends	MCC Category 7 - Holes	MCC
P	G	O	O	350	P	N	P-G-O-O-350-P-N
P	G	O	R	350	P	N	P-G-O-R-350-P-N
P	G	R	O	350	P	N	P-G-R-O-350-P-N
P	G	R	R	350	P	N	P-G-R-R-350-P-N

Shin Yang has followed the structure of model control codes ("MCCs") that is instructed by the Antidumping Commission (the Commission) in this inquiry. In addition, Shin Yang proposes to further classify the "Galvanising" characteristic of the MCC with the coding below:

G = Pre-galvanized;

P = Post-galvanized (HDG);

N = None (mill finish, "black");

First, the application of pre-galvanized pipes is largely for load-bearing and used to construct a building's rigid frame structure while the post-galvanized pipes are used in low-pressure fluid transport, outdoor guardrails and escalators. Next, the price difference between pre-galvanized and post-galvanized pipes could be ranged to 40~50% during the POI. Post-galvanized pipes are more expensive than pre-galvanized pipes. Moreover, the thickness of pre-galvanized pipes is normally in the range of 10~20 mm while it would be more than 60 mm required for post-galvanized pipes. So, the anti-rusting effect would be quite different.

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.

   During the POI, the like goods Shin Yang sold in the domestic market include products made pursuant to various international, national and Shin Yang standards covering a wide range of the product characteristics identified in the reported MCCs. The standards for the products exported to Australia and domestic markets are provided in Exhibit C-1.1.

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.

   Please see below for the list of MCCs sold in the domestic market.

   Shin Yang's proposal:

MCC Category 1 - Prime	MCC Category 2 - Galvanising	MCC Category 3 - Finish	MCC Category 4 - Shape	MCC Category 5 - Steel grades	MCC Category 6 - Ends	MCC Category 7 - Holes	MCC
N	G	O	R	350	P	N	N-G-O-R-350-P-N
N	G	R	O	350	P	N	N-G-R-O-350-P-N
N	G	R	R	350	P	N	N-G-R-R-350-P-N
P	G	O	C	250	P	N	P-G-O-C-250-P-N
P	G	O	C	350	P	N	P-G-O-C-350-P-N
P	G	O	O	350	P	N	P-G-O-O-350-P-N
P	G	O	R	250	P	N	P-G-O-R-250-P-N
P	G	O	R	350	P	N	P-G-O-R-350-P-N
P	G	O	R	450	P	N	P-G-O-R-450-P-N
P	G	P	C	350	P	N	P-G-P-C-350-P-N
P	G	P	R	350	P	N	P-G-P-R-350-P-N
P	G	R	C	250	P	N	P-G-R-C-250-P-N
P	G	R	C	350	P	N	P-G-R-C-350-P-N
P	G	R	O	350	P	N	P-G-R-O-350-P-N
P	G	R	R	250	P	N	P-G-R-R-250-P-N
P	G	R	R	350	P	N	P-G-R-R-350-P-N
P	N	N	C	250	P	N	P-N-N-C-250-P-N
P	N	O	C	250	P	N	P-N-O-C-250-P-N
P	N	O	C	350	P	N	P-N-O-C-350-P-N
P	N	O	R	250	P	N	P-N-O-R-250-P-N
P	N	O	R	350	P	N	P-N-O-R-350-P-N
P	N	P	C	250	P	N	P-N-P-C-250-P-N
P	P	N	C	250	C	N	P-P-N-C-250-C-N
P	P	N	C	250	P	N	P-P-N-C-250-P-N
P	P	P	C	250	C	N	P-P-P-C-250-C-N
P	P	P	C	250	P	N	P-P-P-C-250-P-N
P	P	R	C	250	C	N	P-P-R-C-250-C-N
P	P	R	C	250	P	N	P-P-R-C-250-P-N

ADN's version:

MCC Category 1 - Prime	*MCC Category 2 - Galvanising*	*MCC Category 3 - Finish*	*MCC Category 4 - Shape*	*MCC Category 5 - Steel grades*	*MCC Category 6 - Ends*	*MCC Category 7 - Holes*	*MCC*
N	*G*	*O*	*R*	*350*	*P*	*N*	*N-G-O-R-350-P-N*
N	*G*	*R*	*O*	*350*	*P*	*N*	*N-G-R-O-350-P-N*
N	*G*	*R*	*R*	*350*	*P*	*N*	*N-G-R-R-350-P-N*
P	*G*	*N*	*C*	*250*	*C*	*N*	*P-G-N-C-250-C-N*
P	*G*	*N*	*C*	*250*	*P*	*N*	*P-G-N-C-250-P-N*
P	*G*	*O*	*C*	*250*	*P*	*N*	*P-G-O-C-250-P-N*
P	*G*	*O*	*C*	*350*	*P*	*N*	*P-G-O-C-350-P-N*
P	*G*	*O*	*O*	*350*	*P*	*N*	*P-G-O-O-350-P-N*
P	*G*	*O*	*R*	*250*	*P*	*N*	*P-G-O-R-250-P-N*
P	*G*	*O*	*R*	*350*	*P*	*N*	*P-G-O-R-350-P-N*
P	*G*	*O*	*R*	*450*	*P*	*N*	*P-G-O-R-450-P-N*
P	*G*	*P*	*C*	*250*	*C*	*N*	*P-G-P-C-250-C-N*
P	*G*	*P*	*C*	*250*	*P*	*N*	*P-G-P-C-250-P-N*
P	*G*	*P*	*C*	*350*	*P*	*N*	*P-G-P-C-350-P-N*
P	*G*	*P*	*R*	*350*	*P*	*N*	*P-G-P-R-350-P-N*
P	*G*	*R*	*C*	*250*	*C*	*N*	*P-G-R-C-250-C-N*
P	*G*	*R*	*C*	*250*	*P*	*N*	*P-G-R-C-250-P-N*
P	*G*	*R*	*C*	*350*	*P*	*N*	*P-G-R-C-350-P-N*
P	*G*	*R*	*O*	*350*	*P*	*N*	*P-G-R-O-350-P-N*
P	*G*	*R*	*R*	*250*	*P*	*N*	*P-G-R-R-250-P-N*
P	*G*	*R*	*R*	*350*	*P*	*N*	*P-G-R-R-350-P-N*
P	*N*	*N*	*C*	*250*	*P*	*N*	*P-N-N-C-250-P-N*
P	*N*	*O*	*C*	*250*	*P*	*N*	*P-N-O-C-250-P-N*
P	*N*	*O*	*C*	*350*	*P*	*N*	*P-N-O-C-350-P-N*
P	*N*	*O*	*R*	*250*	*P*	*N*	*P-N-O-R-250-P-N*
P	*N*	*O*	*R*	*350*	*P*	*N*	*P-N-O-R-350-P-N*
P	*N*	*P*	*C*	*250*	*P*	*N*	*P-N-P-C-250-P-N*

C-3 Internal product codes

1. Does your company use product codes or stock keeping unit (SKU) codes?
   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.
   (b) Provide details on how you mapped the product or SKU codes to the MCC for the purpose of completing this questionnaire.
   (c) Provide a table showing the product or SKU codes for each MCC.
   If no:
   (a) Provide details on the method used to identify the MCC in the sales and cost spreadsheets.

In the normal course of business, Shin Yang does not have a product code system which covers all the characteristics of products it produces and sells. For the purpose of sales revenue categorization, Shin Yang uses a [redacted] code system. A list of Shin Yang's [redacted] codes is provided in Exhibit C-3. It should be noted that there is no coding rule designed for each digit of the code, and each [redacted] code represents a unique category of products.

For the purpose of MCC reporting for this submission, Shin Yang has relied on various sources of information held in the company's system. The source is provided in Exhibit B-2.2 and D-2.2.

Please also refer to Exhibit RC-3.1 for sample documentation to explain how to convert the product codes to the MCC structure.

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
   (b) Price determination and/or negotiation process
   (c) Order placement process
   (d) Order fulfilment process and lead time
   (e) Delivery terms and process
   (f) Invoicing process
   (g) Payment terms and process

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.

Shin Yang sells the GUC to both related and unrelated customers in the domestic market. In the normal course of business, the domestic customer solicits price quotations via telephone, email or fax. Shin Yang then provides its offers and negotiates the price and other terms of sale with the customer either via telephone, email or fax. The customer then confirms the order once sales price, sales quantity and other essential terms are agreed upon by both parties. Shin Yang's sales representative then enters the order into the company's computer system. Shin Yang begins production based on the production order entered into the system by the sales department. Once the production is finished, the shipment is arranged based on the term of delivery established. A Government Uniform Invoice ("GUI") is issued by Shin Yang to the customer on the date of shipment.

During the POI, Shin Yang had terms of delivery either on a "delivered" basis or on an "ex-factory" basis, and the payment term on a "[redacted]" basis. [redacted].

In the normal course of business, Shin Yang does not use price lists for its export or domestic sales. However, Shin Yang does have price guidance prepared on a monthly basis. Such price guidance is prepared by Shin Yang's sales department for the sales representatives as a reference in negotiating with customers. The final selling price, however, is still subject to the negotiations with customers in consideration of various factors such as product specifications, quantity, target shipment date, market situation, etc.

(1) Please refer to Exhibit RD-1.1 for the price guidance for the domestic market and the consideration is pursuant to the domestic market situation where is quite competitive. Please also refer to Shin Yang's September 23 Section J response for more details. (2) Indeed, Shin Yang granted the payment term of [redacted]. So, Shin Yang has revised the payment term granted to [redacted] in Exhibit ED-2.1 revised Domestic Sales. (3) Shin Yang has removed the redaction of delivery term in the public record version of the questionnaire.

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.

   Yes, during the POI, Shin Yang had domestic sales of the GUC to the following related customers:

   [redacted]

   Shin Yang's pricing policy for sales to its related customers does not vary from the one for its unrelated customers.

3. If sales are in accordance with price lists or price extras list, provide copies of these lists.

   As explained above, Shin Yang does not use price lists in its normal course of business. Thus, this question is not applicable.

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.

   Not applicable, no sales to domestic market were based on projects in the POI.

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.

   No, Shin Yang's domestic selling prices do not vary according to the distribution channel.

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.

   Shin Yang's domestic selling prices are negotiated on a transaction-by-transaction basis. Shin Yang does not provide on-invoice discount, nor post-sales rebates in the POI.

   [redacted]

   (1) [redacted]

   (2) [redacted]

   (3) [redacted]

   (4) [redacted]

   (5) [redacted]

   [redacted]

   A sample documentation of [redacted] *is provided in E-5.1.*

Shin Yang provides all its customers with warranty services for the goods. Shin Yang usually sends its technicians to examine warranty claims first and refund for defectives, if the transaction is warranted. Shin Yang has reported warranty claims in column "Warranty" in Exhibit D-2.1 Domestic Sales.

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.

   Shin Yang would issue a rebate certificate (a government uniform credit note) to its customer where a rebate was granted. In general, the amount of rebate is used as credit to offset the accounts receivable in relation to the customer to which the rebate is granted instead of being physically refunded to the customer. Please refer to Exhibit RD-1.7 for a sample documentation for rebates granted and clearly matched to the original invoices.

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?
   (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.

Shin Yang is not making a claim that a date different from the invoice date should be used as the date of sale. Thus, this question is not applicable.

D-2 Domestic sales listing

1. Complete the worksheet named "D-2 Domestic sales"
   - 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-1.9 and/or D-1.8 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.

   Please refer to Exhibit D-2.1 for Domestic Sales.

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".

   Please refer to Exhibit D-2.2 for Domestic Sales Source.

D-3 Sample domestic sales documents

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

Please refer to Exhibits D-3.1-a and D-3.1-b for the sales documentation for the two largest invoices by value [redacted] *and* [redacted] *respectively.*

2. 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
   - 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

Not applicable, no sales to domestic market were based on projects in the POI.

3. 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.

   We have done so in Exhibits D-3.1-a and D-3.1-b.

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.
   - 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.

   Please refer to Exhibit B-4 Upward Sales.

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.
   - For example, worksheets (e.g. a master sales listing) showing how you identified and categorised:
     - Sales of the goods subject to measures and other sales (e.g. non-goods or services)
     - Domestic and third country sales of the goods subject to measures
   - 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.

   Please refer to Exhibit B-4-2 for Supporting of Exhibit B-4-1 Upward Sales. In providing the supporting documents for Exhibit B-4-1, Shin Yang has selected one month during the POI to provide the general ledger for each sales revenue account.

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:
   - 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.

   Please refer to the answers above.

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 purchases in certain months) then use an alternative method.
   - Calculating the accounts receivable turnover over the period for that customer using the formula:

$$\frac{Net\ sales\ revenue\ over\ the\ peirod}{Average\ accounts\ receivable}$$

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

$$\frac{365}{\text{Accounts receivable turnover}}$$

[redacted].

2. Do you have short term borrowings or an overdraft facility denominated in your local currency? If yes, what is the interest rate, or average of interest rates?

[redacted] *is provided in Exhibit E-1.2. Again, Shin Yang's standard payment term for its Australian sales of the goods requires Shin Yang's customers to make payment prior to shipment.*

3. Do you have any interest earning deposits or other cash product (e.g. term deposits, bonds) denominated in your local currency? If yes, what is the interest rate, or average of interest rates?

[redacted] *is provided in Exhibit E-1.3. Again, Shin Yang's standard payment term for its Australian sales of the goods requires Shin Yang's customers to make payment prior to shipment.*

4. 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 currency? If yes, what is the interest rate, or average of interest rates?

[redacted] *in the POI.*

(b) Do you have any interest earning deposits or other cash product (e.g. term deposits, bonds) denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?

[redacted] *in the POI.*

E-2 Packaging

1. What is the packaging used for your domestic sales of like goods?

   Please refer to the answers below.

2. What is the packaging used for your export sales of the goods to Australia?

   Please refer to the answers below.

3. If there are distinct differences in packaging between your domestic and export sales:
   (a) Provide details of the differences
   (b) Calculate the weighted average packaging cost for each model sold on the domestic market
   (c) Calculate the weighted average packaging cost for each model exported to Australia

Shin Yang's packing method does not vary by geographic market. Rather, Shin Yang's packing method varies as a result of customer's request transaction by transaction. Thus, certain packing types are commonly used for both export and domestic sales.

Please see Exhibit E-2.3 for the packing costs calculation worksheet. For reporting purposes, Shin Yang has first calculated the per unit packing costs of each type of packing materials, manufacturing overhead and labour based on the packing costs actually incurred at the packing unit during the POI. Shin Yang then has summed up the per unit packing costs of each type of packing materials, manufacturing overhead and labour for each packing type, where applicable, to calculate the type-specific per unit packing costs. Shin Yang then has multiplied the sales quantity of its sales of goods to Australia and the like goods in the domestic market by the associated type-specific per unit packing costs to report the packing expenses in Exhibit B-2 Australian sales and Exhibit D-2 Domestic sales.

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?

   Yes, some of Shin Yang's domestic sales of like goods were delivered to the customer at Shin Yang's expenses. In calculating the inland freight incurred for delivering the like goods of its domestic sales, Shin Yang has traced the inland freight actually incurred for each domestic sale. The inland freight of each shipment is then allocated to the associated pipes by quantity. A sample documentation of inland freight for domestic sales is provided in D-3.1-c.

2. What are the delivery terms of the export sales of the goods to Australia?

   FOB/ FCA CY means "free carrier container yard". Shin Yang would ship the goods to container yard and finished the customs clearing.

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?

   The inland freight from Shin Yang to the port of exit and port changes are reported in actual basis and allocated to the products in the same shipment by weight.

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?

   The port handling and other export charges are reported in actual basis and allocated to the products in the same shipment by weight.

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?

   Not applicable, the delivery term of Australian sales during the POI was FOB.

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?

   Not applicable, the delivery term of Australian sales during the POI was FOB.

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?

   Not applicable, the delivery term of Australian sales during the POI was FOB.

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.

   [redacted].

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?

     The rate of VAT is 5%, levied on purchases of inputs and also on home market sales of finished goods by Shin Yang. Export sales of goods are subject to a zero-percent (0%) VAT and entail a cash refund at the rate of 5% of export sale value against the input VAT paid on purchased inputs. The remaining balance of input VAT is reserved as credits for the next term.

   - How is VAT accounted for in your records in relation to sales of the goods and like goods?

     VAT is not booked in sales revenue accounts. VAT levied on purchases of inputs is booked in asset account while booked in liability account for home market sales of finished goods.

   - Do you receive a VAT refund in relation to sales of the goods and/or like goods?

     Please see answers above.

- Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?

  No. No import tariff paid on imported HRC and consequently no refund needed.

3. Are there any other direct selling expenses incurred by your company in relation to domestic sales of like goods?

   Except inland freight, no other direct selling expenses incurred for domestic sales.

4. Are there any other direct selling expenses incurred by your company in relation to export sales of the goods to Australia?

   In addition to inland freight from Shin Yang to the port of exit, Shin Yang also reports the following expenses in NT$:

   (1) Customs brokerage fee: allocated to the products in the same shipment by weight;

   (2) Harbor service fee: The government fee was charged by Taiwan Customs: allocated to the products in the same shipment by weight;

   (3) Trade promotion fee: The government fee was charged by Taiwan Customs: allocated to the products in the same shipment by value. Please note that the fee is exempted if the fee to be collected for a sale is less than 100 NTD;

   (4) Cargo certification fee: allocated to the products in the same shipment by weight;

   (5) Bank Charge: The charge charged by the bank and deducted directly from the payments from customers; allocated to the products in the same shipment by value;

   (6) Stevedoring fee: allocated to the products in the same shipment by weight;

   (7) Warehousing expense: This expense was paid to a warehousing service provider for services rendered at the seaport of Taiwan; allocated to the products in the same shipment by weight; The warehouse fee for export sales is the fee paid for storage of the goods at port area after goods arrived at port area but before the goods uploaded to vessel. It is not a bonded warehouse. [redacted] *but need to pay the storage fee to the port and then requested payment from Shin Yang for such storage fee. Shin Yang then reported the storage fee at port area in the "warehouse fees" field in Exhibit B-2.1.*

   (8) Terminal handling charge: This expense was paid to a brokerage service provider for services rendered at the seaport of Taiwan; allocated to the products in the same shipment by weight. A sample documentation of terminal handling charge is provided in B-3.1-c.

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.
   - 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.

This question is not applicable, as Shin Yang is not making a claim of other adjustments.

[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.

   The sales process to third countries are the same with Australian sales.

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.

   No, none of the third country customers is related to Shin Yang during the POI.

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) 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.

   Not applicable. Shin Yang has sold the identical product concerned with sufficient quantity in the domestic market. Thus, all the Normal Value is based on the sales in the home market.

F-2 Third country sales listing

1. Complete the worksheet named "F-2 Third country sales"
   - 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.

   Please refer to Exhibit F-2.1 Third Country Sales.

2. 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".

   Please refer to Exhibit F-2.2 Third Country Sales Source.

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.

[redacted]. *Shin Yang has sold the identical product concerned with sufficient quantity in the domestic market. Thus, all the Normal Value is based on the sales in the home market.*

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

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

    Please refer to Exhibit G-1.1 for the flowchart of the production process. Shin Yang's production process of steel pipe products in Pipe Plant I and Pipe Plant II can be summarized as follows:

    (1) Pipe Plant I

    Raw material: Black steel coils or galvanized steel coils are first withdrawn by "Pipe Forming Section I" [redacted] *as raw materials for the production of steel pipes.*

    Slitting: The raw materials are then introduced into the slitting line for slitting process performed by "Pipe Forming Section I – Slitting Unit I" [redacted].

    Pipe making: The slit steel strips are then introduced into the pipe making line for the pipe forming process performed by five separate units "Pipe Forming Section I – Pipe Forming Unit I" [redacted], *"Pipe Forming Section I –Pipe Forming Unit II"* [redacted],*"Pipe Forming Section I –Pipe Forming Unit III"* [redacted],*"Pipe Forming Section I –Pipe Forming Unit IV"* [redacted] *and "Pipe Forming Section I –Pipe Forming Unit V"* [redacted] *under the supervision of "Pipe Forming Section I"* [redacted].

    Galvanizing: The pipes produced at the pipe making stage are then introduced into the galvanizing line for galvanizing process performed by "Pipe Galvanizing Unit" [redacted]. *The galvanized pipes are then painted and marked by "Pipe – Lacquer Coating Unit"* [redacted].

    Threading: The pipes produced at the pipe making stage or the galvanizing stage are then introduced into the threading line for the threading process performed by "Pipe Threading Unit" [redacted].

    Packing: The pipes produced at the pipe making stage, galvanizing stage or the threading stage are then introduced into the packing unit for the packing process performed by "Pipe Forming Section I – Packing" [redacted]. *The pipes packed in bundles are then moved to the finished goods storage area in the factory.*

    Supporting units: The units identified as indirect cost centres in Exhibit G-2.3 provide various maintenance services for the direct cost centers identified above.

    (2) Pipe Plant II

Raw material: Black steel coils or galvanized steel coils are first withdrawn by "Pipe Forming Section II" [redacted] *as raw materials for the production of steel pipes.*

Slitting: The raw materials are then introduced into the slitting line for slitting process performed by "Pipe Forming Section II – Slitting Unit II" [redacted].

Pipe making: The slit steel strips are then introduced into the pipe making line for the pipe forming process performed by two separate units "Pipe Forming Section II – Pipe Forming Unit VI" [redacted] *and "Pipe Forming Section II – Pipe Forming Unit VII"* [redacted] *under the supervision of "Pipe Making Section II"* [redacted].

Galvanizing & Threading: The pipes produced at the pipe making state are then introduced into the galvanizing line of Plant Section I for galvanizing and/or threading processes if necessary.

Packing: The pipes produced at the pipe making stage are then introduced into the packing unit for the packing process performed by "Pipe Forming Section II – Packing" [redacted]. *The pipes packed in bundles are then moved to the finished goods storage area in the factory.*

Supporting units: The units identified as indirect cost centres in Exhibit G-2.3 provide various maintenance services for the direct cost centers identified above.

Shin Yang has two types of scrap generated from the production of merchandise under consideration, i.e., steel scrap and zinc scrap. In its normal course of business, Shin Yang records the steel scrap generated from its production of merchandise under consideration in the account [redacted]. *Shin Yang, however, treats the zinc scrap generated from its pipe production process as a by-product and books it in the account* [redacted] *because zinc scrap has a higher commercial value than the typical scrap.*

All of the steel scrap and zinc scrap recovered from the steel pipe production process were sold to local companies at market prices. During the POI, Shin Yang's steel scrap was sold to both affiliated and unrelated companies in the domestic market. Zinc scrap was only to the unrelated customers during the POI.

Shin Yang has three types of steel scrap, i.e., scrap pipe ([redacted]*), coil edge-trimmed scrap (*[redacted]*) and sheet metal remnant (*[redacted]*) generated from production of steel pipe products. Both coil-edge-trimmed scrap and coil-ends scrap are generated from the slitting process while the pipe scrap is generated from the forming processes.*

On the other hand, Shin Yang has four types of zinc scrap generated from the pipe production process, i.e., zinc dross (3-digit product code: ([redacted]*), zinc ash (*[redacted]*), zinc dust (*[redacted]*) and zinc oxide (*[redacted]*), all of which were generated from the steel pipe galvanizing stage.*

"Zinc dross" is the iron-zinc generated as a result of the reaction between steel pipes and molten zinc which settles to the bottom of the zinc bath. Zinc dross is removed periodically by Shin Yang to control the quality of the zinc bath. Zinc dross has the highest zinc content among the four types of zinc scrap because while being removed from the bath, there is molten zinc inevitably adhering to the iron-zinc being removed.

"Zinc ash" is the zinc oxide present on the surface of molten zinc and is removed periodically by Shin Yang to control the quality of the zinc bath.

"Zinc dust" is generated from the process of removing the molten zinc on the steel pipe to meet the coating specifications. In the ordinary course of business, the steel pipes pulled up out of the bath after galvanizing, are going through a process where the excess zinc is removed from the outside surface by "wiping" with compressed air, and from the inside by "blowing" with heated steam. The zinc dust is generated from the molten zinc being "wiped" and "blown" out of the outside and inside surfaces of the pipe.

"Zinc oxide" is larger piece of zinc ash present on the surface of the molten zinc.

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.

During the POI, the following related companies supplied Shin Yang with major raw material inputs and/or services:

(1) Hot-rolled steel coils

- [redacted]
- [redacted]
- [redacted]

(2) Seaport warehousing and stevedoring services for Australian sales

- [redacted]

(3) Hot-dipped galvanizing of the hot-rolled steel coils

- [redacted]

G-2 Cost accounting practices

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

Shin Yang's cost accounting system is based on actual costs.

2. If your company uses standard costs:
   (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.

Not applicable. Shin Yang does not use standard costs

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

Shin Yang adopts [redacted] .

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.

   Please refer to Exhibit G-2.3 for the list of direct and indirect cost centres. Please refer to Exhibit RG-2.3-a to show the cost center not relating to production (i.e., related to SG&A) and provide the allocation methodology of cost centers in Exhibit RG-2.3-b.

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

   Shin Yang captures cost of manufacturing for the products manufactured at each production stage, i.e., direct cost centres. Shin Yang does not record production costs by models, grades or other levels to differentiate the cost of the products.

6. Are there any costs for management accounting purposes valued differently to financial accounting purposes? If yes, provide details of the differences.

   All production costs are calculated by the same methods for cost accounting purposes and for financial accounting purposes

7. Has your company engaged in any start-up operations in relation to the goods? If yes:
   (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.

   No, Shin Yang did not undergo start-up operations with respect to the subject goods and the like goods. Therefore, this and the preceding questions are not applicable.

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)?

   The inventories of raw materials, work-in-process and finished goods are valued with weighted average method.

9. What are the valuation methods for damaged or sub-standard goods generated at the various stages of production?

   In the normal course of business, the damaged or sub-standard goods are valued in the same way as the prime goods.

10. What are the valuation methods for scrap, by products, or joint products?

    Scrap and by-products are valued by market prices. Shin Yang does not have joint products produced in the normal course of business.

11. Are any management fees/corporate allocations charged to your company by your parent or related company? If yes, provide details

    No, no management fees/corporate allocations charged to Shin Yang or related company.

G-3 Cost to make on domestic market

1. Complete the worksheet named "G-3 Domestic CTM".
   - 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-1.9 and/or D-1.8 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.

   Please refer to Exhibit G-3.1 Domestic CTM. The CTM provided in Exhibit G-3.1 is of all production of the GUC, irrespective of where the GUC is sold.

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".

   Please refer to Exhibit G-3.2 Domestic CTM Source.

G-4 Selling, General & Administrative expenses

1. Complete the worksheet named "G-4.1 SG&A listing".
   - 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 subject to measures.
   - 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.

   Please refer to Exhibit G-4.1 SG&A Listing.

2. Complete the worksheet named "G-4.2 Domestic SG&A calculation".
   - 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.

Please refer to Exhibit G-4.2 Domestic SG&A Calculation.

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.
   - 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.

   Please refer to Exhibit G-4.3 Upwards SG&A.

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.

   Please refer to Exhibit G-4.4 for the general ledgers of all SG&A accounts in Excel covering the year 2025 and the POI.

G-5 Cost to make the goods exported to Australia

1. Complete the worksheet named "G-5 Australian CTM".
   - This worksheet lists the quarterly cost to make the Australian models of the goods subject to measures 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-1.9 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.

   Please refer to Exhibit G-5.1 Australian CTM.

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".

   Please refer to Exhibit G-5.2 Australian CTM Source.

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) Raw materials
   (b) Labour
   (c) Manufacturing overheads

   Shin Yang has used the costs recorded in its financial accounting system to calculate the reported cost to make. These costs are actual costs. However, Shin Yang's accounting system does not record cost of manufacturing on a product-specific (i.e., product model) basis. Rather, Shin Yang calculates one single cost of manufacturing for all the steel pipe products produced in a particular cost centre, without tracking and differentiating the cost differences between various types of steel pipes.

   In calculating the cost to make of the GUC for the reporting purpose, Shin Yang first grouped the steel pipe products into the GUC and non-GUC products for each MCC and then allocated the monthly raw material costs, fixed manufacturing overheads and variable manufacturing overheads on the basis of monthly production quantity of GUC or the processing time of each MCC directly month by month. It should be noted that Steel Pipe Plant I has two pipe forming units, i.e., Pipe Forming Section I and Pipe Forming Section III. During the POI, Pipe Forming Section III was mainly engaged in the production of oil country tubular goods (internally referred to as "API" pipes by Shin Yang) and did not produce any GUC. Thus, Shin Yang does not include Pipe Forming Section III for the calculation of the cost to make of the GUC.

   As stated above in C-3.1, Shin Yang converted the product code to MCCs structure and sum up the total production quantities in theoretical weights (by kilogram). In the normal course of cost

accounting, Shin Yang [redacted]. Shin Yang would trace the heat number of HRC by production lot number in production control system.

We explain the methodologies applied in reporting the costs of the above-mentioned fields as follows:

(1) Raw material costs - hot-rolled steel coils

Shin Yang has allocated the hot-rolled steel coils consumption costs to hot-rolled steel pipes and post-hot-dipped zinc-coated steel pipes based on the production quantity.

(2) Raw material costs – Galvanized steel coils

Shin Yang has allocated the galvanized steel coils consumption costs to pre-galvanized steel pipes based on the production quantity.

(3) Raw material costs – Zinc ingot

Shin Yang has allocated zinc ingot consumption costs to post-hot-dipped zinc-coated steel pipes steel pipes based on the production quantity.

(4) Steel scrap offset and zinc scrap offset

For the reporting of the offsets, Shin Yang has first summed up the monthly sales revenue of the steel scrap and zinc scrap during the POI. Shin Yang then has calculated the monthly per unit steel offset by dividing the monthly sales revenue of the steel scrap by the corresponding monthly production quantity of steel pipes. Shin Yang has also calculated the monthly per unit zinc scrap offset by dividing the monthly sales revenue of the zinc scrap by the corresponding monthly production quantity of post-hot-dip zinc-coated steel pipes. Shin Yang then has multiplied the monthly per unit steel scrap offset and zinc scrap offset by the corresponding monthly production quantity of each associated MCC for the calculation of the reported steel scrap offset and zinc scrap offset. Shin Yang has included a steel scrap offset and zinc scrap offset calculation worksheet in Exhibit G-6.2-1.

(5) Other materials costs

Shin Yang has allocated the consumption costs of the materials used for different surface treatments, including paint, oil and anti-rust materials, to each associated MCC based on the production quantity.

(6) Direct labour

In calculating the direct labour cost on a model-specific basis, Shin Yang has allocated the direct labour costs incurred by slitting stage to each MCC by production quantity, and the direct labour costs incurred by pipe forming stage, galvanizing stage and threading stage by the processing time. The slitting stage, comparing to other production stages, is a short-time production process. Shin Yang thus has allocated the direct labour costs incurred by slitting stage based on production quantity. On the other hand, for those time-consuming production stages, Shin Yang has allocated the direct labour costs based on the processing time experienced by each production of the steel pipes in each stage, as the direct labour costs consumed is in a positive correlation with processing time experienced.

(7) Manufacturing overheads

In calculating the manufacturing overhead costs on a model-specific basis, Shin Yang has allocated the manufacturing overhead costs of slitting stage, including variable and fixed overheads, to each MCC by production quantity, and the manufacturing overhead costs incurred by pipe forming stage, galvanizing stage and threading stage by the processing time. The slitting stage, comparing to other production stages, is a short-time production process. Shin Yang thus has allocated the direct labour costs incurred by slitting stage based on production quantity. On the other hand, for those time-consuming production stages, Shin Yang has allocated the manufacturing overhead costs based on the processing time experienced by each production of the steel pipes in each stage, as the manufacturing overhead costs consumed is in a positive correlation with processing time experienced.

(8) Costs adjustments

Shin Yang has also calculated and reported cost of goods sold ("COGS") adjustments and work-in-process ("WIP") difference adjustments for the cost to make of the goods. Shin Yang has included COGS adjustments in the reported CTM to reflect various cost items captured directly under the account of cost of goods sold in the normal course of business that have not been accounted for in the reported cost of manufacturing. The COGS adjustments consist of the rebates Shin Yang received from its raw material supplier for its purchases of hot-rolled steel coils and some cost adjustments made by Shin Yang during the POI. Shin Yang has included a COGS adjustment calculation worksheet in Exhibit G-6.2-1.

In addition, Shin Yang has included the WIP difference adjustments in the reported CTM to reflect the difference between the beginning inventory and ending inventory of the WIP steel pipes. The difference reflects the costs difference between the WIP pipes before the inquiry period which have been carried forwards for the production of the goods during the POIs, and the WIP pipes during the POI which have been carried forwards for the production of the goods after the inquiry period. Shin Yang has included a WIP difference adjustment calculation worksheet in Exhibit G-6.2-1.

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.

   The cost build-up for the MCC with the largest production volume in the POI [redacted] is provided in Exhibit G-6.2-1. Supporting of cost sample is provided in Exhibit G-6.2-2.

G-7 Major raw material costs

1. What are the major raw materials used in the manufacture of the goods?

   The major materials for the production of the GUC includes hot-rolled steel coils.

2. Are any raw materials sourced as part of an integrated production process or from a subsidiary company over which your company exercise control? If yes, complete the worksheet named "G-7.2 Raw material CTM" for these raw materials.
   - 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.

The major materials for the production of the GUC includes hot-rolled steel coils. As explained in the answer to question G-1.2 above, Shin Yang purchased some hot-rolled coils from its related companies during the POI. Please refer to Exhibit G-7.2 Raw Material CTM. It should be noted that, as mentioned in the answers to A-4.1, the related supplier [redacted] is a manufacturer of the hot-rolled steel coils, while the related suppliers [redacted]. And [redacted] are resellers in supplying Shin Yang with the hot-rolled steel coils. Thus, the CTM reported in the worksheet named "G-7.2 Raw material CTM" represents the cost to make for [redacted] and the purchase cost for [redacted] and [redacted].

The "INTEX" is calculated by [redacted]. As to the interest expense ratio, it is calculated by [redacted].

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.

   For the production of the goods, the steel input costs of hot-rolled and pre-galvanized steel coils collectively account for approximately [redacted]% of the CTM.

4. For each raw material identified in G-7.3 which individually account for 10% or more of the total cost to make, complete the worksheet named "G-7.4 Raw material purchases"
   - 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.

   Please refer to Exhibit G-7.4 Raw Material Purchases for Shin Yang's purchases costs of hot-rolled steel coils during the POI.

5. Provide a table listing the source of the data for each column of the "G-7.4 Raw material purchases" listing.

   Please refer to Exhibit G-7.5 Raw Material Purchases Source.

6. For each raw material:
   (a) Select the two largest invoices by value and provide the commercial invoice and proof of payment.
   (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.

Please refer to Exhibits G-7.6-a and G-7.6-b for the requested documentation for the two largest invoices by value of purchases. Please note the "classification" field of Exhibit G-7.4, the two largest invoices [redacted]. *Please note that the mechanical properties of API steel grade coils, such as yield strength (YS), tensile strength (TS), and elongation (EL), are all higher than those of non-API steel grade. In addition, to meet the aforementioned high mechanical property requirements, API steel grade coils would contain corresponding alloy components, while non-API steel grades do not have this requirement. Moreover, the API steel grade coils are normally at least 6mm thick, while non-API steel grade coils rarely thicker than 6mm. Furthermore, API grade coils are high-strength, and their thickness is extremely difficult to reduce. (2) Please refer to Exhibit RG-7.6-c for the Purchase Reconciliation.*

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.

As explained above, Shin Yang purchased some of the hot-rolled steel from its related companies during the POI. The selling prices were negotiated by Shin Yang and Shin Yang's related companies by the market price.

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.
   - 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.

   Please refer to Exhibit G-8 Upward Costs.

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.
   - For example, worksheets showing how you identified and categorised the cost to make:
     - the goods subject to measures and other costs (e.g. non-goods or tolling services)
     - Domestic, Australian and third country goods subject to measures
   - 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.

   We have done so in Exhibit G-8. Please refer to Exhibit RG-8-b for supporting of Upward Costs.

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.

   We have done so in Exhibit G-8. Please refer to Exhibit RG-8-b for supporting of Upward Costs.

G-9 Production of the goods subject to measures

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.

   The production quantities reported in worksheets "G-3 domestic CTM" and "G-5 Australian CTM" represent the quantities of finished goods upon completion of production process that are entered into the company's finished goods inventory. Goods are considered as "finished" when the required production process and finally the packaging step are both completed. Shin Yang relies on inventory report to capture the production quantities reported in G-3 and G-5. The production quantities are based on theoretical weight. Please note that the production quantities are to sum up all the production quantities in the POI under the same MCC and would not distinguish the sales markets. This is why the production quantities reported in G-3 and G-5 would be identical if falling in the same MCC.

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.

   In the ordinary course of business, Shin Yang maintains the finished goods inventory report which tracks production quantities, as well as the sales quantities. Shin Yang also uses the finished goods inventory report for the calculation of the costs of goods sold and the costs of goods sold are recorded account [redacted] *in its accounting system.*

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

   Please note that Shin Yang's most of production of subject merchandise is make-to-stock and only a small portion were make-to-order. The difference between the production quantities reported at Exhibit G-3 domestic CTM and the sales volumes reported at Exhibit D-2.1 domestic sales would be the discrepancies between the production plan and domestic customers' requirements. However, the production quantities of the same MCC reported at Exhibit G-3 domestic CTM and Exhibit G-5 Australia CTM would be the same and without discrepancy existed.

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?

   Please refer to answers above. The production plan is on a rolling basis.

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

   Depending on the availability of raw materials (i.e., steel coils), the lead time needed to adjust volumes of production may range from weeks to months.

G-10 Capacity Utilisation

1. Please complete the worksheet named "G-10 Capacity Utilisation".

- 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.

Please see Exhibit G-10 Capacity Utilisation for requested information.

2. Explain how the production capacity and capacity utilisation has been calculated.

   The design capacity of the pipe forming facilities is indicated at page 5 of Shin Yang's brochure provided in Exhibit A-2.11.

3. Do you have warehousing facilities for the goods? If no, what do you do with excess inventory? If yes:
   (a) What is the capacity of these facilities?
   (b) What was the monthly amount of inventory maintained during the investigation period?
   (c) What is the average period of time that inventory is retained (describe how this is calculated)?

   No, Shin Yang does not lease warehousing facilities for the goods and no excess inventory incurred in Shin Yang. As stated above in A-2.8, the warehousing fees reported in B-2 Australia sales are the storage fee on port area rather than Shin Yang has warehousing facilities. For export sales of GUC, Shin Yang normally adopts made-to-order and no excess inventory issue.

4. Have there been any changes to the type of capital or technology utilised by your company in the manufacturing of the goods in the last five years? If yes, provide details.

   Not applicable. No changes to the type of capital or technology utilised by Shin Yang in the manufacturing of the goods in the last five years.

5. For each plant capable of producing inputs that could be utilised to make the goods, provide the date that production facility came into operation and the production capacity of the plant over the past five years. The production capacity should be based on an actual production capacity, not a budgeted production capacity.

   No, Shin Yang does not have any plants capable of producing the inputs that could be utilised to make the goods.

6. List any significant investments in the past five years to either upgrade, refurbish or build any of the plants used in the production of the goods.

   No, Shin Yang does not have any significant investments in the past five years to either upgrade, refurbish or build any of the plants used in the production of the goods.

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

In Shin Yang's opinion, the domestic market has been at a stable trend of growth and a competitive market over the past five years.

   (b) Provide the sources of demand for the goods in the domestic market, including the categories of customers, users or consumers of the product

The sources of demand for the goods in the domestic market are predominantly from pressure services and ordinary piping with the rest for general structural purposes.

   (c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b)

It is estimated that [redacted]% comes from pressure services and ordinary piping, while [redacted] % of the revenue comes from general structural purposes.

   (d) Describe the factors that influence 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

The most important factor that fluences consumption/demand in the domestic market is the demand for constructions of all kinds of structures and this is highly related to the overall economic situations of the domestic market.

   (e) Describe any market segmentations in the domestic market; such as geographic or product segmentations

In Shin Yang's opinion, the domestic market of the goods can generally be differentiated by applications, one for general structural purposes, and the other for pressure services and ordinary piping.

   (f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e)

It is estimated that [redacted] % comes from pressure services and ordinary piping, while [redacted] % of the revenue comes from general structural purposes.

   (g) Describe the way in which domestically produced goods and imported goods compete in the domestic market

In Shin Yang's opinion, it is difficult for the imported goods to compete with the domestically produced goods due to the domestic manufacturers' advantage of providing instant delivery of

the goods required by customers. To Shin Yang's knowledge, the imported goods can probably complete with the domestically produced goods for goods with larger sizes that are sometimes under-supplied by the domestic manufacturers.

(h) Describe the ways that the goods are marketed and distributed in the domestic market and

The goods are generally marketed and distributed to end users in the domestic through distributors, with some directly to the end users.

(i) Describe any other factors that are relevant to characteristics or influences on the domestic market for the goods.

None.

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.

The commercially significant market participants of the goods in the domestic market include domestic manufacturers, distributors and end-users.

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.

Please see Exhibit J-1-3 for a list of commercially significant market participants, including manufactures and distributors.

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.

It is unknown to Shin Yang the identity of the commercial significant importers in the domestic market for the goods. Shin Yang estimates that the imported goods have about 20% of the market share in the domestic market.

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.

There are no domestic laws or regulations specifically for the goods.

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.

    There is no entry restrictions for new participants into the domestic market for the goods.

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:
    - 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.

    To Shin Yang's knowledge, a full range of the like goods are offered for sale by the manufacturers in the domestic market. As the industry of the like goods is relatively a mature one, there is generally no significant difference in terms of quality, price, technical support, prevalence of labels or product segmentation between those offered for sale in the domestic market. Shin Yang currently offers for sales in the domestic market the full range of the like goods, [redacted]

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

    The end uses of the goods in the domestic market are predominantly for pressure services and ordinary piping, with some for general structural purposes.

3. 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.

    From Shin Yang's own experiences, the major factors that influences purchasing decisions include the supplier's selling prices, the supplier's range of product sizes and the supplier's ability to meet buyer's expectation of delivery.

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

    There are no commercially significant market substitutes in the domestic market for the goods.

5. 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.

   No, Shin Yang has not seen any changes in market or consumer preferences in the domestic market for the goods in the last five years.

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.

   As demonstrated by Exhibit B-4-2 Supporting of Upward sales, approximately [redacted] % of Shin Yang's sales revenue is derived from sales of the goods in the domestic market. Shin Yang estimates that approximately [redacted] % of its profit is derived from sales of the goods in the domestic market.

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.

   Shin Yang considers itself one of the price leaders for the goods in the domestic 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.

   In principle, Shin Yang's product pricing is [redacted].

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.

   Please see the answer to question D-1.1 above for explanations of Shin Yang's sales process. Shin Yang's selling prices are negotiated and determined on a transaction-by-transaction basis. In negotiating the selling prices with customers, Shin Yang's sales representatives rely on the internal price guidance established by the company.

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.

Shin Yang's internal price guidance is generally updated on a monthly basis and the most important factor for pricing setting is the raw material price announced periodically by the upstream steel mills of steel coils.

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
   - Purchase price of raw materials
   - Cost to make and sell the goods
   - Level of inventory
   - Value of the order
   - Volume of the order
   - Value of forward orders
   - Volume of forward orders
   - Customer relationship management
   - Supplier relationship management
   - Desired profit
   - Brand attributes
   - Other [please define what this factor is in your response]

   Shin Yang has ranked the following factors in terms of their influence on Shin Yang's pricing decisions:

   [redacted]

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?

   As explained above, Shin Yang's pricing is [redacted]

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.

No, Shin Yang does not offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the domestic market.

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.

   No, Shin Yang does not offer bundled pricing in the domestic market.

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.

    The volume of sales to a customer or the size of an order does influence Shin Yang's selling prices in the domestic market. In general, Shin Yang is more willing to reduce selling prices for customers that constantly purchase the goods from Shin Yang with large volumes. However, the level of price reductions is still subject to negotiations with the customer on a transaction-by-transaction basis.

11. Does your organisation/business entity use sales contracts in the domestic market? If yes:
    (a) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
    (b) Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
    (c) How frequently are sales contracts renegotiated?
    (d) How frequently are price reviews conducted between contracts?
    (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.
    (f) Do changes in your costs to make and sell enable you to review prices for customers within contracts?
    (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.

    No, Shin Yang does not use sales contracts in the domestic market.

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.

    This question is not applicable, as Shin Yang does not use price lists for domestic sales of the goods.

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.

    Shin Yang differentiates pricing for the goods by [redacted], due to the differences in raw material inputs and production processes applied.

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.

    No, Shin Yang does not tier or segment its domestic customers for the goods in terms of pricing.

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.

    Yes, Shin Yang sold a small amount of the goods to related companies in the domestic market during the POI. The goods sold to related companies during the POI were for the related companies' own consumption, rather than for resales. The prices for sales to related companies are set the same way as Shin Yang's sales to unrelated customers. During the POI, the sales revenue of the GUC sold to related companies account for [redacted] % of Shin Yang's domestic sales revenue of the GUC.

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.).

    Please refer to the answers in J-3.6.

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.

    No, Shin Yang does not conduct brand segmentation in the domestic market for the goods.

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.

In recent years, Shin Yang started to use social media (e.g., Facebook) in promoting its business by sharing with the general public the various business events it has participated or held. Shin Yang did not otherwise conduct domestic advertising of the goods over the past five years.

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.

   There are in total [redacted] sales representatives in Shin Yang's domestic market sales term of the welded steel pipes (including the goods under consideration) and they work from Shin Yang's headquarters.

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.

   In order to assist its sales representatives in establishing and negotiating selling prices for the goods with customers, Shin Yang sets its internal price guidance for the sales representatives to rely on as the minimum selling price.

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) Provide an overall description of the Australian market for the goods which explains its main characteristics and trends over the past five years

From Shin Yang's perspective, the Australian market for the goods remains the same over the past five years. The only noticeable change is the rising exports for the goods from Vietnam to Australia in recent years.

   (b) Provide the sources of demand for the goods in Australia, including the categories of customers, users or consumers of the product

From Shin Yang's perspective, the sources of demand for the goods in Australian are entirely from traders, which in turn distribute the goods in the Australian market for general structural purposes.

   (c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b)

For Shin Yang's sales of the goods to Australian, the sales revenue is entirely from traders.

   (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

The factors that influence consumption/demand of the goods in the Australian market include the general economic growth/decline and seasonal fluctuations.

   (e) Describe any market segmentations in Australia; such as geographic or product segmentations

From Shin Yang's perspective, there is a geographic segmentation in the Australian market that can be divided into four regions: north, south, east and west.

   (f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e)

In general, Shin Yang estimates that [redacted]% its sales of the goods is from the [redacted].

   (g) Describe the way in which Australian manufactured and other imported goods compete in the Australian market

The Australian manufactured goods compete with other imported goods mainly based on the locality advantage which allow the Australian manufacturers to provide more instant delivery of a wider range of the goods.

(h) Describe the ways that the goods are marketed and distributed in the Australian market and

To Shin Yang's knowledge, the goods are marketed and distributed in the Australian market mainly through regional distributors.

(i) Describe any other factors that are relevant to characteristics or influences on the market for the goods in Australia.

From Shin Yang's perspective, there is no other major factor that is relevant to characteristics or influences on the market for the goods in Australia.

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.

The major market participants in the Australian market include manufacturers, distributors, importers and end-users.

3. Describe the commercially significant market participants in the Australian 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.

Please see Exhibit K-1-3 for a list of major market participants of the goods in the Australian market.

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 Australian market, if known.

Please see Exhibit K-1-3 for the requested information. Shin Yang is unaware of the source country of the goods that each importer imports from and the respective market share.

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.

There are no laws or rules in Australian that specifically regulate for the goods that are known to Shin Yang.

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).

To Shin Yang's knowledge, there is no entry restriction for new participants into the Australian market for the goods.

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

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 subject to measures 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.

   To Shin Yang's knowledge, a full range of the goods is offered for sale by the Australian manufacturers in the Australian market, except for the goods with hot-dip post-galvanised finish. Shin Yang also offers a full range of the goods for its Australian customers, but in practice, almost all the Shin Yang's orders from Australia are for the goods with pre-galvanised finish.

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

   To Shin Yang's knowledge, the goods in the Australian market are for general structural purposes, including residential, commercial, industrial and farming structures.

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.

   From Shin Yang's perspective, the key attributes that influence purchasing decisions or preferences include prices, delivery timeliness, and size range of the goods.

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

   There are no commercially significant market substitutes in the Australian market for the goods.

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

   There are no commercially significant market complements in the Australian market for the goods.

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.

No, Shin Yang has not noticed any changes in market or consumer preferences in the Australian market for the goods in the last five years.

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.

As demonstrated by Exhibit 23 (Upward sales), approximately [redacted]% of Shin Yang's sales revenue is derived from sales of the goods to the Australian market. Shin Yang estimates that approximately [redacted]% of its profit is derived from sales of the goods in the Australian market.

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.

No, Shin Yang is not the price leader for the goods in the Australian market. Shin Yang considers [redacted] as the price leader for the goods 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.

Shin Yang's pricing for its sales of the goods to Australia is in general a cost-plus pricing based on its internal price guidance. The prices set in Shin Yang's internal price guidance take into consideration of various economic factors, including cost of production and market conditions. The final selling prices for the goods sold to Australia are dependant to Shin Yang's negotiations with its customers considering sales volume, product mix and market conditions, etc.

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.

The selling prices of the goods for the Australian market are determined through Shin Yang's negotiations with its customers on a transaction-by-transaction basis. In determining the offering prices, Shin Yang's sales representatives rely on the prices set in Shin Yang's internal price guidance, in which minimum selling prices are established by the sales department. Please see Exhibit K-4-5 for a copy of Shin Yang's internal price guidance for export sales.

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.

Shin Yang's internal price guidance is generally determined on a monthly basis by its sales managers.

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
    - Purchase price of raw materials
    - Cost to make and sell the goods
    - Level of inventory
    - Value of the order
    - Volume of the order
    - Value of forward orders
    - Volume of forward orders
    - Customer relationship management
    - Supplier relationship management
    - Desired profit
    - Brand attributes
    - Other [please define what this factor is in your response]

    Please see the following for the ranked factors that influence Shin Yang's pricing decisions:

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

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.

    In general, Shin Yang uses a cost-plus pricing strategy. Thus, Shin Yang manages to make profits from its sales of the goods to Australia.

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.

Shin Yang does not offer post-sale (e.g., sales rebates) price reductions for its exports of the goods to Australia. The selling price is negotiated and determined on a transaction-by-transaction basis. Price reductions may be made to initial offering prices due to various reasons, such as the underlying size and product mix of an order being negotiated.

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.

   No, Shin Yang does not offer bundled pricing in the Australian market.

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.

    Yes, the volume of sales to a customer and the size of an order both influence the selling price. However, there is no uniform criterion applied by Shin Yang in negotiating the selling price with its customers. In general, Shin Yang is more willing to provide price reductions to its initial offering prices when the market the demand is weak, but Shin Yang generally maintains its selling prices above the minimum selling price set in its internal price guidance.

11. Does your organisation/business entity use sales contracts in the Australian market? If yes:
    (a) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?

    Shin Yang uses written sales contracts for all of its Australian sales. The sales contract is entered into by Shin Yang and its customers on a transaction-by-transaction basis.

    (b) Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?

    No, Shin Yang does not offer exclusivity contracts.

    (c) How frequently are sales contracts renegotiated?

    Shin Yang's sales contracts with its Australian customers are made on a transaction-by-transaction basis.

    (d) How frequently are price reviews conducted between contracts?

    The selling prices agreed upon by Shin Yang and its Australian customers in the sales contract are generally not subject to changes, unless both parties agree.

    (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.

No, Shin Yang generally does not provide opportunities for price reviews for customers within contracts.

(f) Do changes in your costs to make and sell enable you to review prices for customers within contracts?

No, changes in Shin Yang's costs to make and sell generally do not enable Shin Yang to review prices for customers within contracts.

(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.

All of Shin Yang's Australian customers during the investigation period are under contracts. The sample sales contracts are provided in the sample Australian sales document under Section B of this questionnaire response.

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.

This question is not applicable, as Shin Yang does not use any price lists for its sales of the goods to Australia. Shin Yang's price quotations to its Australian customers are provided on a transaction-by-transaction basis relying on Shin Yang's internal price guidance. Shin Yang's internal price guidance is not disclosed to any of its Australian customers.

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.

Shin Yang differentiates pricing by three product categories: "black" pipes, pre-galvanised pipes, and post-galvanised pipes. Please see Shin Yang's internal price guidance for these categories.

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

No, Shin Yang does not tier or segment its Australian customers for the goods in terms of pricing.

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.

No, Shin Yang does not sell the goods to any related entity in 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.).

   Shin Yang markets the goods in the Australian market mainly based on its competitive price, quality and availability of wide size ranges.

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.

   No, Shin Yang does not conduct brand segmentation in the Australian market for the goods.

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.

   Shin Yang has not conducted any advertising activities for its goods in the Australian market over the past five years.

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.

   Shin Yang's Australian sales are handled by its Global Marketing and Sales Section II. There are in total [redacted] employees in section, and other than the Australian market, this section also covers other markets such as Japan, New Zealand and other non-America geographic markets.

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.

   Other than the internal price guidance, there are no other parameters provided to sales staff to assist in establishing pricing for the goods when negotiating sales with customers.

EXPORTER'S DECLARATION

I hereby declare that.....(company)
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: .....

Signature: .....

Position in Company: .....

Date: .....

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 subject to measures 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 subject to measures (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 taken to have occurred in substantial quantities during an extended period where the unprofitable sales amount to 20% or more of the total volume of sales of the goods by the exporter over the period. An extended period of time 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.