PUBLIC RECORD

Australian Government
Department of Industry, Science and Resources

Anti-Dumping Commission

Exporter Questionnaire

Case number:	**710**
Product:	Certain Hollow Structural Sections
From:	The People's Republic of China, the Republic of Korea, Malaysia and Taiwan
Inquiry period:	1 April 2025 – 31 March 2026 (the period)
Response due by:	9 September 2026 Part A response due by **9 September 2026** Part B onwards **extended to 23 September 2026**
Email enquiries to:	investigations3@adcommission.gov.au

Anti-Dumping Commission website: www.adcommission.gov.au

Responses to the exporter questionnaire must be submitted via SIGBOX. Please contact the commission on the above email address to request access to SIGBOX.

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INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the commission) is conducting a continuation inquiry into certain Hollow Structural Sections (HSS; the goods) exported to Australia from the People's Republic of China (China), the Republic of Korea (Korea), Malaysia and Taiwan (collectively, subject exporting markets).

The commission will use the information you provide to determine normal values and export prices over the inquiry period (the period). This information will determine whether certain HSS from the subject exporting markets has been dumped. The commission will also use this information to determine whether certain HSS from China has been in receipt of countervailable subsidies over the period.

The Commission will collect and use information in accordance with its Collection and Use of Information Policy.

If you do not manufacture the goods

If you play a role in the export of the goods but do not produce or manufacture the goods (for example, you are a trading company, broker, or vendor dealing in the goods), it is important that you forward a copy of this questionnaire to the relevant manufacturers and inform the commission of the contact details for these manufacturers **immediately**.

The commission will still require your company to complete this exporter questionnaire except Section G – Cost to make and sell.

What happens if you do not respond to this questionnaire?

You do not have to complete the questionnaire. However, if you do not respond, do not provide all of the information sought, do not provide information within a reasonable time period, or do not allow the commission to verify the information, we may deem your company to be an uncooperative exporter. In that case the commission must determine a dumping margin and, for Chinese exporters, a subsidy margin having regard to all relevant information.

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

Extension requests

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

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

- the commission's responsibility to conduct the case in a timely and efficient manner
- the reasons why you could not provide a response within the whole period and not only the period remaining between the request and the due date
- ordinary business practices or commercial principles
- the commission's understanding of the relevant industry

- previous correspondence and previous dealings with your company and
- information provided by other interested parties.

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

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

A summary of any requests and grants of extensions to submit a response to this exporter questionnaire will be published in the public record.

Submitting a response to the exporter questionnaire

Responses to the exporter questionnaire should be lodged via SIGBOX, a secure online document repository. Please contact the commission on the email address listed on the cover page to request access to SIGBOX.

In submitting the response to the exporter questionnaire, you must answer all questions, include all attachments and spreadsheets, and provide a non-confidential version of your response to this exporter questionnaire.

If your response to this exporter questionnaire contains major deficiencies that, in the Commissioner's view, cannot be quickly and easily rectified in a further response, then your company may be considered as an uncooperative exporter.

Confidential and non-confidential responses

You are required to lodge a confidential version (OFFICIAL: Sensitive) and a non-confidential version (for publishing on the public record) of your response to this exporter questionnaire by the due date. Please ensure that *each page* of information you provide is clearly marked either "**OFFICIAL: Sensitive**" or "**PUBLIC RECORD**".

All information provided to the commission in confidence will be treated accordingly. The public record version of your questionnaire will be placed on the public record and must contain sufficient detail to allow a reasonable understanding of the substance of the information without breaching confidentiality.

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

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

A person is not required to provide a summary for the public record if the commission can be satisfied that no such summary can be given that would allow a reasonable understanding of the substance of the information.

All questionnaires are required to have a bracketed explanation of deleted or blacked out information for the public record version of the questionnaire. An example of a statement to accompany deleted/blacked out text is:

[Explanation of cost allocation through the divisions, by reference to machine hours or weight].

If such an explanation is not provided, the commission may disregard the information in the questionnaire. Where the public record version of your response to the exporter questionnaire does not contain sufficient detail, your company may be requested to resubmit your response with the required level of detail or, if deadlines have passed, the commission may not have regard to it.

Verification of the information that you supply

The commission may wish to conduct a verification of your questionnaire response for completeness, relevance and accuracy of the information to your company's records.

The verification is not meant to be a chance for you to provide new or additional information. The commission expects your response to the questionnaire to be relevant, complete and accurate.

The verification may include Commission staff visiting your company to conduct on onsite verification. Any onsite verification typically commences approximately 2 to 4 weeks after the due date of the response to the exporter questionnaire. To assist with the planning of a verification, please contact the commission as soon as possible for a potential verification date to be scheduled.

The onsite verification is usually conducted over 4 days. However, in complex cases, it may be scheduled over 5 days. A verification will include a detailed examination of your company's records, and we will collect copies of relevant documents. The verification will require the participation of key staff, including your financial accountant, production manager and sales staff. A tour of the manufacturing facility may also be required during the verification.

The commission may elect to undertake an alternative verification methodology, rather than an onsite verification, to satisfy itself of the completeness, relevance and accuracy of the data.

Note that the commission may disregard any data or information that is not verified, including new or additional information provided after the verification visit.

A report will be prepared following the verification, which details the outcomes of the verification. This report will be placed on the public record and may include the publication of the preliminarily assessed dumping margin and (for Chinese exporters) subsidy margin. The commission considers that the dumping margin and subsidy margins are not confidential information, but rather an aggregate figure derived from confidential data.

You will be provided with an opportunity to comment on the accuracy and confidentiality of the verification report prior to its publication on the public record.

For information on the commission's verification procedures, refer to Anti-Dumping Notice No. 2016/30 available on the commission's website.

Important instructions for preparing your response

- All questions in this exporter questionnaire must be completed. If a question is not applicable to your situation, please answer the question with "Not Applicable" and provide an explanation as to why.

- All questions must be answered in English. An English translation must be provided for documents not originally in English. To the extent that the foreign language version differs, the English translation will be given priority as a matter of interpretation in Australia.

- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same measurement consistently throughout your response to the questionnaire.
- Label all attachments to your response according to the section of the questionnaire it relates to (e.g. label the chart of accounts as Attachment A-4.6)
- The data must be created as spreadsheet files in Microsoft Excel.
- If you have used formulas to complete spreadsheets, these formulas must be retained and not hard-coded.
- You must retain all worksheets used in answering the questionnaire. Be prepared to provide these worksheets during the commission's verification of your data.
- If you cannot present electronic data in the requested format, contact the commission as soon as possible.
- Where possible, electronic data should be shared with the commission via SIGBOX, a secure online document repository. Please contact the commission to request access to SIGBOX if required.

CHECKLIST

This section is an aid to ensure that you have completed all sections of this questionnaire.

Exporters from **China** are required to complete:

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

Exporters from **Korea, Malaysia** and **Taiwan** are required to complete:

- All sections except Section H and Section I (i.e. complete Sections A-G, and Sections J-K)
- Exporter's declaration
- Non-confidential version of this response.

Section	**Complete this section if you are an exporter from the following markets**	Please tick if you have responded to all questions
Section A Company Information	China, Korea, Malaysia and Taiwan	✓
Section B Export sales to Australia	China, Korea, Malaysia and Taiwan	✓
Section C Exported goods & like goods	China, Korea, Malaysia and Taiwan	✓
Section D Domestic sales	China, Korea, Malaysia and Taiwan	✓
Section E Due allowance	China, Korea, Malaysia and Taiwan	✓
Section F Third country sales	China, Korea, Malaysia and Taiwan	✓
Section G Cost to make and sell	China, Korea, Malaysia and Taiwan	✓
Section H Particular market situation	China	N/A
Section I Countervailing	China	N/A
Section J Domestic Market	China, Korea, Malaysia and Taiwan	✓
Section K Australian Market	China, Korea, Malaysia and Taiwan	✓
Exporter's declaration	China, Korea, Malaysia and Taiwan	✓
Non-confidential version of this response	China, Korea, Malaysia and Taiwan	✓

Attachments	**Complete this attachment if you are an exporter from the following markets**	Please tick if you have provided spreadsheet
B-2 Australian sales	China, Korea, Malaysia and Taiwan	✓
B-2.2 Australian sales source	China, Korea, Malaysia and Taiwan	✓
B-4 Upwards sales	China, Korea, Malaysia and Taiwan	✓
D-2 Domestic sales	China, Korea, Malaysia and Taiwan	✓
D-2.2 Domestic sales source	China, Korea, Malaysia and Taiwan	✓
F-2 Third country sales	China, Korea, Malaysia and Taiwan	✓
F-2.2 Third country sale source	China, Korea, Malaysia and Taiwan	✓
G-3 Domestic CTM	China, Korea, Malaysia and Taiwan	✓
G-3.2 Domestic CTM source	China, Korea, Malaysia and Taiwan	✓
G-4.1 SG&A listing	China, Korea, Malaysia and Taiwan	✓
G-4.2 Domestic SG&A calculation	China, Korea, Malaysia and Taiwan	✓
G-4.3 Upwards SG&A	China, Korea, Malaysia and Taiwan	✓
G-5 Australian CTM	China, Korea, Malaysia and Taiwan	✓
G-5.2 Australian CTM source	China, Korea, Malaysia and Taiwan	✓
G-7.2 Raw material CTM	China, Korea, Malaysia and Taiwan	N/A
G-7.4 Raw material purchases	China, Korea, Malaysia and Taiwan	✓
G-8 Upwards costs	China, Korea, Malaysia and Taiwan	✓
G-10 Capacity Utilisation	China, Korea, Malaysia and Taiwan	✓
I-1 Company Turnover	China	N/A
I-3 Income Tax	China	N/A
I-4 Grants	China	N/A
I-5 Preferential Loans	China	N/A

GOODS SUBJECT TO ANTI-DUMPING MEASURES

The goods subject to measures (the goods) i.e. the goods exported to Australia, allegedly at dumped prices and, for goods exported from China, in receipt of countervailable subsidies, are:

Notice under section 269TG(2)

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

and

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

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

and

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

Notice under section 269TJ(2)

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

and

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

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

and

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

The certain hollow structural sections the subject of the original application, investigation and REP 177 are[1]:

Certain electric resistance welded pipe and tube made of carbon steel, comprising circular and non-circular hollow sections. Normally referred to as either CHS (circular or oval hollow sections) or RHS (rectangular or square hollow sections) collectively referred to as hollow structural sections (HSS), including CHS with other than plain ends, such as threaded, swaged and shouldered.

Finish types:

- *Galvanised (including in-line galvanised (ILG), pre-galvanised or hot-dipped galvanised (HDG)); or*
- *Non-galvanised (including, but not restricted to, painted, black, lacquered or oiled finishes).*

Sizes:

- *Circular products – outside diameter exceeding 21 mm up to and including 165.1 mm; or*
- *Oval, square and rectangular products – perimeter up to and including 1277.3 mm; that may also be categorised according to minimum yield strength, the most common classifications being 250 and 350 mega Pascals (MPa).*

Goods excluded from the measures are:

- *Conveyor tube made for high-speed idler rolls on conveyor systems with inner and outer fin protrusions removed by scarfing; (not exceeding 0.1 mm on outer surface and 0.25 mm on inner surface), and out of round standards (i.e. ovality) which do not exceed 0.6 mm in order to maintain vibration free rotation and minimum wind noise during operation;*
- *Precision RHS with a nominal thickness of less than 1.6 mm (and not used in structural applications); and*
- *Air heater tubes to AS 2556*

There are also current exemption notices applying to the goods. Further details of the exempt goods and the relevant exemption notices are available on the DCR[2].

The goods are generally, but not exclusively, classified to the following tariff subheadings (Table 1, below) of Schedule 3 to the *Customs Tariff Act 1995*[3] as noted in the goods description, tariff classifications

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[1] These certain hollow structural sections were also investigated in subsequent inquiries and detailed in REP 379, REP 590 and REP 685 and in the commission's Dumping and Commodity Register (DCR).
[2] A list of excluded goods is available on the commission's DCR.
[3] These tariff classifications and statistical codes may include goods that are both subject and not subject to the anti-dumping measures. The listing of these tariff classifications and statistical codes is for convenience or reference only and do not form part of the goods description. Please refer to the goods description for authoritative detail regarding goods subject to the anti-dumping measures.

7306.50.00 statistical code 45 and 7306.61.00 statistical code 90 (indicated by * in Table 1) only apply to the following exporters:

- Dalian Steelforce Hi-Tech Co. (China)
- Tianjin Friend Steel Pipe Co., Ltd (China)
- Tianjin Ruitong Iron and Steel Co., Ltd (China)
- Roswell S A R L Limited (China); and
- Malaysia by Alpine Pipe Manufacturing SDN BHD (Malaysia).

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

Table 1: General tariff classification for the goods

Model Control Code

Details of the model control code (MCC) structure for the goods are detailed in the table below. Export sales data (Section B-2), domestic sales data (Section D-2) and cost to make and sell data (Section G-3, G-4 & G-5) submitted in this response must follow this MCC structure. At a minimum, the data must report sales and cost data separately for each of the mandatory MCC categories identified by the commission.

Item	Category	Sub-category	Identifier	Sales data	Cost data
1	**Prime**	Prime	P	Mandatory	Not applicable
		Non-prime/downgrade	N		
2	**Galvanising**	Galvanised	G	Mandatory	Mandatory
		None (eg mill finish, 'black')	N		
3	**Finish**	Oiled	O	Mandatory	Mandatory
		Painted	P		
		Coating other than oil or paint	R		
		No coating	N		
4	**Shape**	Circular	C	Mandatory	Mandatory
		Rectangular or square	R		
		Oval	O		
		Other	T		
5	**Steel grades – nominal minimum yield strength**	Steel grade with nominal minimum yield strength less than or equal to 300 MPa	250	Mandatory	Mandatory
		Steel grade with nominal minimum yield strength greater than 300 MPa but less than 380 MPa	350		
		Steel grade with nominal minimum yield strength equal to or greater than 380 MPa	450		
		Steel grade with no nominal yield strength	N		
6	**Ends**	Plain	P	Mandatory	Mandatory
		Threaded (at one or both ends)	T		
		Threaded and coupled	C		
7	**Holes**	Holes (including drilled, punched, pierced, cut or otherwise) at the end of the section, along its length or both.	H	Mandatory	Mandatory
		No holes	N	Mandatory	Mandatory

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

The MCCs will be used to match export models to the identical or comparable domestic models. In addition, the MCCs will be used to determine the profitability of domestic sales in the ordinary course of trade by comparing domestic selling prices to the corresponding cost to make and sell. The MCC may also be used to compare the export price to the cost to make the exported model as part of the constructed normal value.

If there are models manufactured and sold by your company that do not align within the MCC structure above, this should be raised by lodging a submission with the commission as soon as is practicable, but no later than the time this questionnaire is due, otherwise the response may be considered deficient.

SECTION A
COMPANY INFORMATION

A-1 Company representative and location

1. Please nominate a contact person within your company:

Name:	**[CONFIDENTIAL TEXT DELETED – personal information]**
Position in the company:	**[CONFIDENTIAL TEXT DELETED – personal information]**
Telephone:	**[CONFIDENTIAL TEXT DELETED – personal information]**
E-mail address:	**[CONFIDENTIAL TEXT DELETED – personal information]**

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

Name:	**Yunjin Lee** **Charles Zhan**
Firm:	**Moulis Legal**
Address:	**6/2 Brindabella Circuit, Brindabella Business Park, Canberra International Airport, Australian Capital Territory, Australia, 2609**
Telephone:	**+61 2 6163 1000**
E-mail address:	**yunjin.lee@moulislegal.com** **charles.zhan@moulislegal.com**

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.

NEXTEEL's financial records are held at its head office located at its Pohang Plant 1, being 195, Songdeok-ro 212beon-gil, Daesong-myeon, Nam-gu, Pohang-si, Gyeongsangbuk-do, Republic of Korea.

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

Same as above.

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

NEXTEEL's production plants manufacturing the goods and the like goods are as follows:

- **Gyeongju Plant 1: 80, Gangdongsandan-ro, Gangdong-myeon, Gyeongju-si, Gyeongsangbuk-do, Republic of Korea**
- **Pohang Plant 1: 195, Songdeok-ro 212beon-gil, Daesong-myeon, Nam-gu, Pohang-si, Gyeongsangbuk-do, Republic of Korea**
- **Pohang Plant 2: 51, Seoman-ro, Nam-gu, Pohang-si, Gyeongsangbuk-do, Republic of Korea**

A-2 Company information

1. What is the legal name of your business?

The legal name of the business is NEXTEEL Co., Ltd ("NEXTEEL" or "the Company").

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

The Company trades under the name NEXTEEL.

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

The Company was first established in January 1990 under the name Daewon Industrial Co., Ltd. The Company changed its legal name to NEXTEEL Co., Ltd. in March 2001.

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

NEXTEEL provides a list of its current board of directors and any changes in the last two years in CONFIDENTIAL Exhibit A-2.4 – NEXTEEL Board of Directors list.

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

Please refer to CONFIDENTIAL Exhibit A-2.5 – NEXTEEL ownership structure.

NEXTEEL notes that none of its subsidiaries were involved in the production, sale or distribution of the goods subject to measures to Australia during the Inquiry Period ("the period").

6. Is your company or parent company publicly listed?

If yes, please provide:

(c) The stock exchange where it is listed and

(d) Any principal shareholders[4]

If no, please provide:

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

NEXTEEL is a publicly traded company listed on the Korea Stock Exchange. Please refer to CONFIDENTIAL Exhibit A-2.6 for the detailed information on principal shareholders.

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.

NEXTEEL is engaged in the manufacture and sale of steel pipe products. NEXTEEL's core products can be broadly classified into three categories: line pipe, standard pipe, and oil country tubular goods ("OCTG"). Line pipe is manufactured primarily for the transportation of oil, gas, and other fluids and is supplied in accordance with internationally recognized standards such as API specifications. Standard pipe is produced for a wide range of applications, including pressure piping, structural use, fluid conveyance, and industrial purposes. These products are supplied under various international and national standards, including ASTM, JIS, and KS specifications. OCTG products consist mainly of casing and tubing used in oil and gas drilling and extraction, and include finished products with heat treatment, threading, and coupling processes and are supplied in accordance with internationally recognized standards such as API specifications. NEXTEEL sells its products to both export and domestic markets.

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.

NEXTEEL performs all of the above functions in relation to the goods subject to measures.

9. Provide your company's internal organisation chart.

Please refer to CONFIDENTIAL Exhibit A-2.9.

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[4] 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.

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

Please refer to CONFIDENTIAL Exhibit A-2.10 – NEXTEEL organisation functions.

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

Please refer to the brochure in Exhibit A-2.11.

A-3 General accounting information

1. What is your financial accounting period?

NEXTEEL's financial accounting period is from January 1 to December 31.

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

NEXTEEL's financial accounts are audited by [CONFIDENTIAL TEXT DELETED – internal accounting information].

3. What currency are your accounts kept in?

NEXTEEL's accounts are kept in Korean Won.

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

All account data and records are maintained in NEXTEEL's proprietary information system.

5. What is the name of your sales system?

The sales system is maintained in NEXTEEL's proprietary information system.

6. What is the name of your production system?

The production system is maintained in NEXTEEL's proprietary information system.

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.

NEXTEEL's financial accounting, sales and production systems are fully integrated within internally developed ERP system.

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

No, NEXTEEL maintains its financial records in accordance with the Korean International Financial Reporting Standards ("K-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 have been no changes to NEXTEEL's accounting practices and/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.

Please see the CONFIDENTIAL 2024 and 2025 audit reports of NEXTEEL Co., Ltd., attached as follows.

Consolidated:

- **Exhibit A-4.1.1 – NEXTEEL's Consolidated Audit Report FY2024 (KOR)**
- **Exhibit A-4.1.2 – NEXTEEL's Consolidated Audit Report FY2024 (ENG)**
- **Exhibit A-4.1.3 – NEXTEEL's Consolidated Audit Report FY2025 (KOR)**
- **Exhibit A-4.1.4 – NEXTEEL's Consolidated Audit Report FY2025 (ENG)**

Unconsolidated:

- **Exhibit A-4.1.5 – NEXTEEL's Unconsolidated Audit Report FY2024 (KOR)**
- **Exhibit A-4.1.6 – NEXTEEL's Unconsolidated Audit Report FY2024 (ENG)**
- **Exhibit A-4.1.7 – NEXTEEL's Unconsolidated Audit Report FY2025 (KOR)**
- **Exhibit A-4.1.8 – NEXTEEL's Unconsolidated Audit Report FY2025 (ENG)**

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.

Please see the audit management letters included in CONFIDENTIAL Exhibits A-4.1.1 to A-4.1.8 above.

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.

Not applicable. NEXTEEL's financial statements in A-4.1 were 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.

NEXTEEL does not maintain separate profit centres. [CONFIDENTIAL TEXT DELETED – internal financial processes]. Accordingly, NEXTEEL does not prepare separate profit and loss 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 period is different to NEXTEEL's financial period. Accordingly, Income statements for FY2025 and the first quarter of FY2026 are provided in CONFIDENTIAL Exhibit A-4.5.

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

Please see attached as CONFIDENTIAL Exhibit A-4.6 NEXTEEL's trial balance for FY2025 and the first quarter of FY2026.

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

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

Please refer to CONFIDENTIAL Exhibit A-4.7.

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.

NEXTEEL's Australian sales of the goods during the Inquiry period were made through direct exports to [CONFIDENTIAL TEXT DELETED – Australian sales information].

NEXTEEL did not conduct any separate marketing or advertising activities specifically targeting the Australian market. Instead, sales are initiated when customers seeking to import NEXTEEL's products approach NEXTEEL directly.

The sales process for exports to Australia is as follows:

The unaffiliated Australian customer sends its order to NEXTEEL via e-mail. Upon receipt of the customer's inquiry, NEXTEEL and the Australian customer negotiate the terms of sale on a transaction-by-transaction basis, including size, price, quantity, and delivery terms.

Once an initial agreement is reached between NEXTEEL and the Australian customer, the customer issues a purchase order to NEXTEEL, which NEXTEEL signs and returns. The signed purchase order also functions as NEXTEEL's order confirmation.

Once production is complete, NEXTEEL transfers the merchandise to a Korean port. When the product is transferred to the Korean port, NEXTEEL issues a shipping invoice that indicates only the quantity of merchandise transported from NEXTEEL's factory to the Korean port. Lead time depends on the customer's order requirements and shipping schedule. Under normal circumstances, the lead time for NEXTEEL to fulfil its export sales order is approximately [CONFIDENTIAL TEXT DELETED – lead time] months.

Once the products that are to be shipped are determined, NEXTEEL will issue the commercial invoice and packing list just prior to, or on the date of shipment, to identify the products that are to be loaded on the vessel for delivery to the customer. As the sales are

made on an [CONFIDENTIAL TEXT DELETED – Australian sales terms] basis, NEXTEEL's sales are completed when [CONFIDENTIAL TEXT DELETED – Australian sales terms].

NEXTEEL receives the bill of lading from the shipping company when the merchandise is loaded onto the vessel, and NEXTEEL is responsible for providing the Australian customer with the bill of lading.

Finally, upon presentation of the relevant sales documentation, NEXTEEL collects payment directly from the Australian customer in accordance with the payment terms specified on the purchase order. During the period, NEXTEEL's payment terms for export sales were [CONFIDENTIAL TEXT DELETED – Australian sales payment terms].

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

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

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

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

NEXTEEL made [CONFIDENTIAL TEXT DELETED – information related to currency of sales]. Payment for the export sales was received into NEXTEEL's account [CONFIDENTIAL TEXT DELETED – receiving bank information].

NEXTEEL did not enter into any forward contracts to lock in the foreign exchange rate relating to the export sales to Australia.

NEXTEEL applies the [CONFIDENTIAL TEXT DELETED – exchange rate used by NEXTEEL] exchange rate. For sales made on an FOB basis, NEXTEEL applied the exchange rate in effect on the date [CONFIDENTIAL TEXT DELETED – sensitive business practice information]. The applicable exchange rate is updated on a daily basis.

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.

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

NEXTEEL does not maintain any price lists or price extras lists for sales to Australia. Prices for all export sales during the Inquiry period were determined through individual negotiations with the customer.

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.

[CONFIDENTIAL TEXT DELETED – project-based sales information]

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.

Export selling prices did not vary by distribution channel, as NEXTEEL sold all goods to Australia through a direct export channel during Inquiry period.

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.

NEXTEEL [CONFIDENTIAL TEXT DELETED – sensitive business practice information] during the Inquiry period.

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.

[CONFIDENTIAL TEXT DELETED – credit and debit note information]

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.

NEXTEEL submits that the date of the confirmation of the purchase orders, being the date on which both NEXTEEL and its [CONFIDENTIAL TEXT DELETED – Australian customer information] signed the purchase order, to be the most suitable date for establishing the

date of sale with respect to its Australian sales during the period. The purchase order confirmation/signing date better reflects the date of sale than the invoice date, due to the following factors.

The signed purchase order is a sales contract between NEXTEEL and [CONFIDENTIAL TEXT DELETED – Australian customer information] and established all material terms of sale, such as product specification, price, quantity of the order, and provides a reliable timing reference for the relevant sales. In addition, the purchase orders are further confirmed through NEXTEEL's [CONFIDENTIAL TEXT DELETED – sensitive business sales process]. NEXTEEL confirms that the material terms of sale, being the unit price, sales quantity and product specification, were not varied between the purchase order dates and the invoice dates reported in the B-2 Australian Sales worksheet.

As shown in B-2, NEXTEEL had [CONFIDENTIAL TEXT DELETED – Australian sales information].. It would be incorrect and unreasonable for [CONFIDENTIAL TEXT DELETED – Australian sales information] and for its normal value to be assessed based on [CONFIDENTIAL TEXT DELETED – sales timing].

In light of the above, NEXTEEL submits that the Commission should use the order confirmation date of NEXTEEL's Australian sales as the date of sale in this continuation inquiry.

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*[5].

   - 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 see CONFIDENTIAL Exhibit B-2 – Australian 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

[5] 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.

b. Price at which the goods are sold to that customer

c. The delivery terms of the sale to that customer

Not applicable, in that NEXTEEL did not export the goods to Australia through an intermediary.

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".

NEXTEEL has provided the table listing the source of the data for each column in the export sales listing in CONFIDENTIAL Exhibit B-2, tab "B-2.2".

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)

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

NEXTEEL has provided the requested documents for the two largest Australian export sales invoices by value in CONFIDENTIAL Exhibits B-3.1 and B-3.2.

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.

[CONFIDENTIAL TEXT DELETED – information regarding project-based sales]

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.

NEXTEEL has provided annotations within the B-3.1 documents.

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 see CONFIDENTIAL Exhibit B-4 Upwards 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 see supporting documents for CONFIDENTIAL Attachment "B-4 Upwards sales" in the Exhibit B-4.

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 see supporting documents for CONFIDENTIAL Attachment "B-4 Upwards sales" in the Exhibit B-4.

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.

The goods exported to Australia during the period consist of [CONFIDENTIAL TEXT DELETED – specified product information]. The pipes were supplied [CONFIDENTIAL TEXT DELETED – specified product information].

The [CONFIDENTIAL TEXT DELETED – specified product information] products exported during the period had [CONFIDENTIAL TEXT DELETED – specified product information].

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.

The MCCs of goods exported to Australia during the period are:

- **P-N-O-C-250-P-N**
- **P-N-O-R-350-P-N**

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.

The domestic like goods sold during the period had the following specifications and features:

[CONFIDENTIAL TEXT DELETED – technical product information]

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.

The list of MCCs of like goods sold on the domestic market during the period was as follows:

- **N-G-O-C-250-P-N**
- **N-N-N-C-250-P-N**
- **N-N-N-C-350-P-N**
- **N-N-O-C-250-P-N**
- **N-N-R-C-250-P-N**
- **N-N-R-C-350-P-N**
- **N-N-R-C-450-P-N**
- **P-G-N-C-250-P-N**
- **P-G-N-C-350-P-N**
- **P-G-N-C-N-P-N**
- **P-G-O-C-250-P-N**
- **P-G-O-C-350-P-N**
- **P-G-O-C-N-P-N**
- **P-G-O-R-250-P-N**
- **P-N-N-C-250-P-N**
- **P-N-N-C-350-P-N**
- **P-N-N-C-N-P-N**
- **P-N-N-R-250-P-N**
- **P-N-O-C-250-P-N**
- **P-N-O-C-350-P-N**
- **P-N-O-C-450-P-N**
- **P-N-O-C-N-P-N**
- **P-N-O-R-250-P-N**
- **P-N-O-R-350-P-N**
- **P-N-O-R-450-P-N**

- **P-N-P-R-250-P-N**
- **P-N-R-C-250-P-N**
- **P-N-R-C-350-P-N**
- **P-N-R-C-450-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.

NEXTEEL uses product codes to identify its goods.

NEXTEEL's system assigns each product a [CONFIDENTIAL TEXT DELETED – product code information]. Each code is a serial number corresponding to a unique combination of [CONFIDENTIAL TEXT DELETED – product code configuration information]. A new product code is created when NEXTEEL receives an order for a product configuration that does not already have an existing serial number [CONFIDENTIAL TEXT DELETED – product code configuration information].

A detailed table of product codes with individual elements defined is provided in CONFIDENTIAL Exhibit C-3.

[CONFIDENTIAL TEXT DELETED – product code assignment and generation process]

For purposes of this questionnaire response, NEXTEEL mapped product codes to MCCs as follows:

(1) Product quality (Prime or Non-Prime): determined based on the quality information recorded in the sales system;
(2) Galvanizing: determined based on the surface information recorded in the sales system;
(3) Finish: determined based on the production order information;
(4) Shape: identified using the shape information embedded in the product code;
(5) Steel grade: determined based on the specification applicable to each product grade;
(6) Ends: determined based on the end finish information recorded in the sales system; and

(7) Holes: determined [CONFIDENTIAL TEXT DELETED – sensitive production information]

NEXTEEL provides an example of the mapping process in CONFIDENTIAL Exhibit C-3.

In terms of methodology, NEXTEEL notes that it identified the subject goods using a step-by-step methodology based on product description, shape, and dimensional criteria.

First, NEXTEEL classified all products recorded in its ERP system according to their product description. Products were initially categorized as pipe, coil, C-channel, or scrap. All products other than pipe were classified as non-subject merchandise and excluded from further scope analysis.

Second, for products classified as pipe, NEXTEEL conducted a detailed review based on shape and size specifications to determine whether the products fell within the scope of the goods subject to measures. Pipe products were divided into circular hollow sections (CHS) and rectangular or square hollow sections (RHS).

For circular pipes, NEXTEEL assessed whether the outside diameter fell within the size range specified in the scope description. Only circular pipes within the specified diameter range were treated as subject merchandise.

For rectangular or square pipes, NEXTEEL calculated the pipe perimeter based on side A and side B dimensions. The calculated perimeter was then compared against the perimeter threshold set out in the scope description to determine whether the product fell within the relevant size range. Among those products whose calculated perimeter fell within the scope definition, products with a wall thickness of 1.6 mm or less were classified as non-subject merchandise, while only products with a wall thickness exceeding 1.6 mm were treated as subject merchandise.

Based on this methodology, only those pipe products determined to fall within the scope of the goods subject to measures were included in the sales listings reported in B-2 Australian Sales, D-2 Domestic Sales, and F-2 Third Country Sales. All non-subject goods were excluded from these reported sales databases.

A detailed explanation of the methodology used to identify the MCC is provided in CONFIDENTIAL Exhibit C-3.

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.

NEXTEEL did not engage in separate advertising activities for its domestic market sales, apart from producing its website and product brochures. NEXTEEL had [CONFIDENTIAL TEXT DELETED –sales channel information].

For domestic market sales, customers contact NEXTEEL via email, telephone or through direct visits. Upon receipt of the customer's inquiry, NEXTEEL will begin to negotiate the terms of sale with the customer.

Negotiation and price determination is conducted on the basis of [CONFIDENTIAL TEXT DELETED – price determination factors]. Once an initial agreement is reached with the customer, NEXTEEL inputs the sales order into its system. Negotiation of the price may continue after the initial order input, up until the point of commercial and tax invoice issuance.

Delivery terms on the domestic market are usually delivered or ex-works. If the product is already in stock, NEXTEEL issues a shipping invoice and proceeds directly to shipment. Domestic delivery is undertaken by external logistics companies. If the product is not available in inventory, NEXTEEL schedules production. The lead time from order placement date is usually around 8 weeks. Once production is complete, NEXTEEL ships the goods to the customer along with a shipping invoice. NEXTEEL subsequently issues tax and commercial invoices to the customer, generally at the end of each month.

Payment terms with domestic customers are usually [CONFIDENTIAL TEXT DELETED – payment terms]. Due to the large number of domestic customers, NEXTEEL does not [CONFIDENTIAL TEXT DELETED – payment terms information and procedure]. As noted above, invoices are ordinarily issued to customers at the end of each month.

Please refer to CONFIDENTIAL Exhibit D-1.1 for detailed information.

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.

Not applicable, in that NEXTEEL's domestic customers were not related to NEXTEEL.

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

Not applicable, in that NEXTEEL's domestic sales were not in accordance with price lists or price extras lists.

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.

[CONFIDENTIAL TEXT DELETED – information regarding project-basis of sales].

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.

[CONFIDENTIAL TEXT DELETED – domestic selling price and level of trade information].

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.

NEXTEEL provided [CONFIDENTIAL TEXT DELETED – information regarding provision of discounts].

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.

NEXTEEL issued credit notes during the period in connection [CONFIDENTIAL TEXT DELETED – credit note information].

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.

NEXTEEL has reported the date of sales using the invoice date. This is [CONFIDENTIAL TEXT DELETED – information regarding sales process].

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 CONFIDENTIAL Exhibit D-2 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 CONFIDENTIAL worksheet D-2.2 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 see the supporting documentation for two largest domestic invoices in CONFIDENTIAL Exhibit D-3.1 and D-3.2.

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.

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.

Please refer to the annotations contained in CONFIDENTIAL Exhibits D-3.1 and D-3.2.

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.

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.

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.

Not applicable.

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:

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

For Australian sales, NEXTEEL has reported the credit period as [CONFIDENTIAL TEXT DELETED – credit period information]. Please see a sample calculation in CONFIDENTIAL Exhibit E-1.1-a – Calculation of average credit period (export).

For domestic customers, NEXTEEL provides a sample calculation in its CONFIDENTIAL Exhibit E-1.1-b, which utilises the calculation method as follows:

[CONFIDENTIAL TEXT DELETED – domestic credit period calculation method].

This is the payment days reflected in the D-2 domestic sales listing and utilised for the credit calculation.

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?

NEXTEEL provides the requested interest rate calculation at CONFIDENTIAL Exhibit E-1.2. The interest rate over the period was [CONFIDENTIAL TEXT DELETED – interest rate]%.

For domestic sales, NEXTEEL calculated the per-unit cost of credit on a transaction specific basis and reported this cost in this field. NEXTEEL divided the calculated number of credit days by 365 and multiplied it by the applicable interest rate paid on

short-term borrowings in KRW as shown in Exhibit E-1.2. NEXTEEL has reported this expense in the column [23] "Other Expenses – credit".

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?

NEXTEEL provides the requested average interest rates calculation at CONFIDENTIAL Exhibit E-1.3.

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?

   (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?

NEXTEEL [CONFIDENTIAL TEXT DELETED – information regarding short-term borrowings].

NEXTEEL provides the requested deposit interest rate calculation at CONFIDENTIAL Exhibit E-1.4-a.

NEXTEEL calculated the per-unit cost of credit on a transaction specific basis and reported this cost in this field. NEXTEEL divided the calculated number of credit days by 365 and multiplied it by the applicable interest rate paid on short-term borrowings in KRW. NEXTEEL has reported this expense in the column [30] "Other costs – Credit Expense (USD)", and also provided the sample calculation in CONFIDENTIAL Exhibit E-1.4-b.

E-2 Packaging

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

[CONFIDENTIAL TEXT DELETED – list of packaging materials and process].

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

Same as above.

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

There are no such differences.

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?

Transportation costs are incurred on a per-truck basis. NEXTEEL has calculated the reported unit expense by dividing the actual total transportation cost for each shipment by the total metric tons shipped. With respect to delivery terms, domestic sales are made under "ex-factory" and "delivered" terms. When the delivery term is "ex-factory", no transportation cost is incurred. When the delivery term is "delivered", transportation costs are incurred and calculated using the methodology described above.

Please refer to CONFIDENTIAL Exhibit E-3.1 for a detailed example of the domestic inland freight calculation methodology.

Additional inland freight is also incurred for some of the goods shipped from factory to warehouses. Please refer to CONFIDENTIAL Exhibit E-3.1.1.

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

Delivery terms of the export sales of the goods to Australia during the period [CONFIDENTIAL TEXT DELETED – delivery terms of exports to Australia].

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?

Delivery terms for NEXTEEL's sales to Australia [CONFIDENTIAL TEXT DELETED – delivery terms of exports to Australia].

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?

NEXTEEL [CONFIDENTIAL TEXT DELETED – delivery terms of exports to Australia].

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?

[CONFIDENTIAL TEXT DELETED – delivery terms of exports to Australia].

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?

[CONFIDENTIAL TEXT DELETED – delivery terms of exports to Australia].

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?

[CONFIDENTIAL TEXT DELETED – delivery terms of exports to Australia].

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.

[CONFIDENTIAL TEXT DELETED – selling expense information]

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?
- How is VAT accounted for in your records in relation to sales of the goods and like goods?
- Do you receive a VAT refund in relation to sales of the goods and/or like goods?
- Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?

There are no such differences in liability that affect comparability between NEXTEEL's domestic and Australian sales.

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

NEXTEEL incurred warehouse expenses for some sales which were shipped to and from its warehouse in Busan. Warehousing expense has been calculated by taking the total monthly rental cost of the warehouse, and the total sales quantity of goods shipped to Busan to calculate a quarterly unit warehousing expense. The quarterly unit expense was then applied to sales transactions in D-2 of goods which were shipped to Busan. Please refer to CONFIDENTIAL Exhibit E-4.3 Calculation of warehouse expense.

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

NEXTEEL incurred some bank charges and brokerage fees with respect to its Australian sales of the GUC.

The brokerage fee relates to customs clearance fee paid to customs broker for the export declaration and customs clearance. This fee is incurred on an invoice-by-invoice basis. Please refer to CONFIDENTIAL Exhibit E-4.4-a for the detailed domestic brokerage fee calculation.

Further, NEXTEEL paid bank charges in collecting the payment from Australian customers. NEXTEEL has calculated the ratio of the fee by dividing the fee with the

collection amount and then applied the ratio in each relevant transaction reported in the B-2 worksheet. NEXTEEL has reported this expense in the column [29] "Other costs - Bank Charge (KRW)" and the column [29.2] "Other costs - Bank Charge (USD)", and also provided the sample calculation of bank charge for a sampled Australian sale in CONFIDENTIAL Exhibit E-4.4-b.

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)*[6] for more information.

NEXTEEL refers to its submissions above in B and D, with respect to:

- **the adoption of purchase order signing/confirmation date as the date of sales for Australian sales; and**
- **[CONFIDENTIAL TEXT DELETED – domestic sales information].**

[6] 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.

Sales processes to third country are generally the same as the sales process described in B-1.1 (i.e. exports to Australia). The main difference is that for exports to third countries, NEXTEEL [CONFIDENTIAL TEXT DELETED – third country sales prodcess].

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.

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.

NEXTEEL notes that it has sufficient domestic sales of like goods during the Inquiry period. Therefore, its third country sales will not be relevant for the purpose of dumping margin determination in this review.

For completeness, NEXTEEL advises that it considers the date of sales for third country sales made on DDP or DAP terms to be the customs clearance date in the importing country. This is because, [CONFIDENTIAL TEXT DELETED – sales process and accounting information].

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.

NEXTEEL has provided CONFIDENTIAL Exhibit F-2 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”.

NEXTEEL has provides CONFIDENTIAL Exhibit F-2.2.

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.

Various differences exist between Australian sales and third country sales with respect to sales channels and delivery terms, commission, and market conditions, which affect the functions performed, risks assumed, and costs incurred by NEXTEEL.

In any case, NEXTEEL understands that third country sales will not be required for comparison to export sales to Australia as there are sufficient domestic sales of like goods for the calculation of normal value.

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.

    [CONFIDENTIAL TEXT DELETED – raw material procurement information].

    NEXTEEL's production process for the goods is as follows: [CONFIDENTIAL TEXT DELETED - detailed description of production process].

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.

    No.

G-2 Cost accounting practices

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

    NEXTEEL'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.

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

    NEXTEEL applies a process costing system in its normal cost accounting practices.

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 CONFIDENTIAL Exhibit G-2.4 for the cost centres in NEXTEEL's cost accounting system.

The activity names associated with the indirect cost centers contained in Exhibit G-2.4 are as follows: [CONFIDENTIAL TEXT DELETED – name and description of internal cost centres]

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

NEXTEEL records production costs [CONFIDENTIAL TEXT DELETED – description of cost recording practice].

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

No, there are no costs for management accounting purposes which are valued differently than 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.

NEXTEEL did not engage in any start-up operations in relation to the goods during the Inquiry period.

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)?

Raw material inventories, work-in-progress (including semi-finished products such as skelp), and goods in transit are valued at actual cost using the specific identification method. Finished goods inventories and the cost of goods sold for pipe are valued on a monthly weighted-average basis. All inventory items are stated at the lower of cost or market value.

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

Damaged goods that cannot be sold as products are treated as scrap and are valued based on their scrap sales value.

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

NEXTEEL does not manufacture co-products or by-products in its facility. Scrap is valued based on scrap sales values estimated based on the unit price of scrap sales from the previous month.

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

No.

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 see CONFIDENTIAL Exhibit G-3 Domestic CTM.

   [CONFIDENTIAL TEXT DELETED – domestic sales and cost reporting information].

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 see CONFIDENTIAL 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 see CONFIDENTIAL 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 see CONFIDENTIAL worksheet 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 see CONFIDENTIAL 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 see refer to CONFIDENTIAL Exhibit G-4.4 General ledgers of all SG&A accounts.

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 see CONFIDENTIAL Exhibit G-5 Australian CTM. Please also refer to the sample cost calculation in CONFIDENTIAL Exhibit G-6.2 for the methodology NEXTEEL used to derive the CTM for MCC reported in G-3 and G-5.

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 see CONFIDENTIAL worksheet G-5.2 Australian CTM source in CONFIDENTIAL Exhibit G-5.

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

NEXTEEL allocates costs reported in G-3 Domestic CTM and G-5 Australian CTM based on actual production data recorded in its normal cost accounting system.

For raw materials, the material cost for the initial production process, [CONFIDENTIAL TEXT DELETED – cost allocation process].

Conversion costs are allocated to [CONFIDENTIAL TEXT DELETED – cost allocation process].

With respect to manufacturing overheads, [CONFIDENTIAL TEXT DELETED – cost allocation and reporting process].

Please refer to CONFIDENTIAL Exhibit G-6.2 for a more detailed demonstration of this allocation exercise.

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 domestic model with the largest production volume over the period was [CONFIDENTIAL TEXT DELETED – MCC]. Please see the cost allocation method in CONFIDENTIAL Exhibit G-6.2.

G-7 Major raw material costs

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

The major raw material used in the manufacture of the goods is hot rolled coil.

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.

No.

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.

The weighted average percentage of hot rolled coil as a proportion of total cost to make was [CONFIDENTIAL TEXT DELETED – percentage figure].

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 see CONFIDENTIAL Exhibit G-7.4 Raw material purchases.

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

Please see CONFIDENTIAL Exhibit G-7.4 Raw material purchases. For the source of the data of G-7.4, please refer to CONFIDENTIAL Exhibit G-7.6(b).

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 see CONFIDENTIAL Exhibit G-7.6(a)(1) and CONFIDENTIAL G-7.6(a)(2) for the two largest raw material purchase invoices.

Please refer to CONFIDENTIAL G-7.6(b) for the raw material purchase listing 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.

None of the suppliers in G-7.4 Raw material purchases are related to NEXTEEL.

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 see CONFIDENTIAL Exhibit G-8 Upwards 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.

Please see CONFIDENTIAL Exhibit G-8.

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.

Please see CONFIDENTIAL Exhibit G-8.

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.

NEXTEEL records [CONFIDENTIAL TEXT DELETED – production quantity recording process].

The aggregated production data is then used to prepare the production quantities reported in worksheets "G-3.1 Domestic CTM" and "G-5.1 Australian CTM." The detailed calculation methodology is illustrated in worksheet Exhibit G-6.2.

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 relation to production quantities, NEXTEEL [CONFIDENTIAL TEXT DELETED – documentation retained].

As mentioned above, the [CONFIDENTIAL TEXT DELETED – production quantity recording process].

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".

The differences between the production quantities reported in G-3 and G-5, and the sales volumes reported a D-2 and B-2, are caused by:[CONFIDENTIAL TEXT DELETED – explanation of differences in production quantities].

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?

Production volumes are determined differently for export and domestic sales. For export sales, production is [CONFIDENTIAL TEXT DELETED – production volume determination explanation].

For domestic sales, production volumes are determined by [CONFIDENTIAL TEXT DELETED – production volume determination explanation].

Each production line operates [CONFIDENTIAL TEXT DELETED – production line operation and management].

Domestic inventory production is managed based on [CONFIDENTIAL TEXT DELETED – inventory production management].

Production volumes and product mix are reviewed and determined [CONFIDENTIAL TEXT DELETED – production volume and product mix determination process].

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

[CONFIDENTIAL TEXT DELETED – lead time factors].

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 CONFIDENTIAL Exhibit G-10 Capacity Utilisation.

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

Production capacity has been calculated on the basis of the output that can be achieved under normal operating conditions, taking into account the given constraints of equipment, labour and production efficiency.

The calculation is as follows:

[CONFIDENTIAL TEXT DELETED – production capacity calculation method]

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)?

[CONFIDENTIAL TEXT DELETED – sensitive warehousing information]

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.

No.

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.

NEXTEEL is not a producer of the input raw materials for 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.

[CONFIDENTIAL TEXT DELETED – significant investment information]

SECTION H
PARTICULAR MARKET SITUATION

It is a mandatory requirement to complete this section if you are an exporter from **China**.

Not applicable to NEXTEEL.

SECTION I
COUNTERVAILING

It is a mandatory requirement to complete this section if you are an exporter from China who is subject to the countervailing duty notice. Refer ADN 2022/049 to see if you are a subject exporter on the countervailing duty notice.

Not applicable to NEXTEEL.

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

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

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

   (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

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

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

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

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

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

Provide documentary evidence to support the responses made to questions 1(a) to (i).

NEXTEEL provides its response to each of the questions above as follows.

(a) **NEXTEEL offers a broader range of products in the domestic market than in the Australian market. There have been no significant changes in either supply or demand over the past five years. NEXTEEL's brochure is provided at Exhibit J-1.1.(a) in support of this response.**

(b) **NEXTEEL's domestic customers fall [CONFIDENTIAL TEXT DELETED – domestic customer categories and correlated demand drivers].**

(c) **The estimated proportions of sales revenue by source of demand are as follows: [CONFIDENTIAL TEXT DELETED – NEXTEEL domestic sources of demand percentage information]. As NEXTEEL does not have visibility of the domestic market as a whole, these proportions are reported on the basis of NEXTEEL's own customers.**

(d) **Provided that the requirements of the applicable specification are met, there is little difference in quality between domestically produced pipe and imported pipe. Customers therefore regard price as the most important factor, and domestically produced goods compete with imports on the basis of reliable, on-time supply and consistent quality in addition to price. Whilst NEXTEEL is not in possession of detailed import data, its general understanding is that imports account for a materially smaller share of the Korean market for the goods than is the case for flat steel products, as Korea is a net exporter of steel pipe and as customers for**

the goods place more weight on short delivery lead times and on the ability to supply to order, which favours domestic production.

(e) NEXTEEL produces and sells pipe in a full range of sizes for a wide variety of applications, and it sells throughout Korea. Accordingly, [CONFIDENTIAL TEXT DELETED – domestic market sales approach].

(f) As NEXTEEL sells all of its products in all regions, it [CONFIDENTIAL TEXT DELETED – domestic market sales approach]

(g) Provided that the requirements of the applicable specification are met, there is little difference in quality between domestically produced pipe and imported pipe. Customers therefore regard price as the most important factor, and domestically produced goods compete with imports on the basis of reliable, on-time supply and consistent quality in addition to price. [CONFIDENTIAL TEXT DELETED – domestic market sales approach].

2. Provide a diagram which describes the domestic market structure for the goods, ensuring that all categories of participants are included. In this diagram use linkages to illustrate the different levels of trade and distribution channels within the domestic market.

A diagram describing the domestic market structure for the goods is provided at CONFIDENTIAL Exhibit J-1.2.

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.

NEXTEEL does not have sufficient information to determine commercially significant market participants in the domestic market as a whole. With respect to NEXTEEL's own level of trade and domestic customers, please refer to detailed response above in Section D.

According to the statistics published by the Korea Iron and Steel Association ("KOSA") for December 2025, total domestic sales of steel pipe in Korea in calendar year 2025 were approximately 2,702,000 tonnes. NEXTEEL's domestic sales of steel pipe (including non-GUC) in the same period were [CONFIDENTIAL TEXT DELETED – volume in tonnes], being approximately [CONFIDENTIAL TEXT DELETED – percentage] of total domestic sales of steel pipe in Korea.

KOSA does not publish production or sales statistics for hollow structural sections separately from other steel pipe products, and NEXTEEL does not hold information from which the total size of the domestic market for the goods can be determined. NEXTEEL is therefore unable to calculate its share of the domestic market for the goods, and the figures above are provided as an indication of NEXTEEL's relative size in the broader domestic steel pipe market only.

The domestic market is supplied by a number of producers that are substantially larger than NEXTEEL, including SeAH Steel Corporation, Husteel Co., Ltd., Kumkang Industrial

Co., Ltd. and Miju Steel Mfg. Co., Ltd. NEXTEEL is a comparatively small producer that concentrates on higher-specification products.

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.

NEXTEEL is unable to identify the names of commercially significant importers in the domestic market for the goods nor their market share.

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.

The domestic market for the goods in Korea is not subject to any product-specific regulation of price, output or supply, and is governed only by laws of general application.

Competition policy: The Monopoly Regulation and Fair Trade Act applies to all industries in Korea and, as enforced by the Korea Fair Trade Commission, prohibits cartel conduct, abuse of a market-dominant position and unfair trade practices. There is no government price approval or output allocation mechanism applicable to the goods; domestic prices are determined by negotiation between the supplier and the customer.

Taxation: Domestic sales of the goods are subject to value added tax at the general rate of 10%, NEXTEEL pays corporate income tax at the standard statutory rates, and no excise or commodity tax applies to the goods. Apart from the zero-rating of exports for value added tax purposes, domestic and export sales are treated alike; imports are subject to the applicable MFN or preferential (FTA) duty rate.

Product standards: The relevant standards for the goods are the Korean Industrial Standards, principally KS D 3566 and KS D 3568, and NEXTEEL also manufactures to ASTM, JIS or EN specifications where a customer requests them.

Range of the goods: No regulation restricts the dimensions, grades or specifications of the goods that may be produced or sold in the domestic market; the range supplied by NEXTEEL is determined by customer requirements and its production capability.

Copies of the regulations and standards referred to above are provided at Exhibit J-1.5.1 and J-5.1.2.

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 are no entry restrictions specific to the goods that limit new participants entering the domestic market. Such barriers as exist are commercial rather than regulatory.

- **Resource ownership**

Hot-rolled coil, the principal raw material, is available from Korean steelmakers and by import, and no participant controls access to that input.

As shown in Exhibit G-7.4, during the period, [CONFIDENTIAL TEXT DELETED – raw material procurement].

- **Patents and copyrights**

The goods are manufactured to published standard specifications, and there are no patent or copyright barriers to their production or sale.

- **Licenses**

There is no government licensing or approval regime specific to the manufacture or sale of steel pipe. The establishment and operation of a plant requires factory establishment approval under the Industrial Cluster Development and Factory Establishment Act and is subject to laws of general application including the Clean Air Conservation Act, the Water Environment Conservation Act and the Occupational Safety and Health Act, which apply equally to new entrants and to existing producers.

- **Barriers to entry**

The practical barriers are the typical commercial factors affecting steel industry, being the capital cost of tube-mill equipment, customer supplier-qualification processes and economies of scale. The domestic market is a mature market in which numerous producers compete.

- **Import restrictions**

NEXTEEL is not aware of any import prohibition, quota or import licensing requirement applicable to the goods. Imports are subject to the applicable MFN or preferential (FTA) duty rate under the Customs Act and the relevant free trade agreements.

- **Government regulations and their effect**

There is no mechanism by which the government approves or restricts entry into the domestic market. Only the laws of general application described in the response to question 5 apply, and they apply without distinction to new entrants and existing producers, so government regulation has no effect on the conditions of entry or competition in the domestic market.

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.

NEXTEEL offers the full range of the goods in the domestic market. Products are distinguished by specification (Korean Industrial Standards and customer-nominated standards), shape (circular and square/rectangular), outside diameter and wall thickness. NEXTEEL does not [CONFIDENTIAL TEXT DELETED – domestic sales approach].

- **Quality differences**

The goods are standard specification products. Where the requirements of the relevant standard are met, there is little difference in quality between producers or between goods of different origin.

- **Price differences**

Prices vary according to specification, dimensions, order quantity and the timing of the order.

- **Supply and availability differences**

Both domestically produced and imported goods are available on an ongoing basis. Apart from differences in lead time for particular specifications, there is no structural difference in availability.

- **Technical support differences**

As the goods are standard specification products, after-sales technical support is not a material factor in purchasing decisions, and the level of technical support does not differ materially between producers.

- **Private labels, generic labels and premium labels**

The goods are not sold on a branded basis in the domestic market. Product marking is limited to specification, dimensions and producer identification. There is no private label or premium label practice for the goods.

- **Product segmentation**

The market is differentiated by specification and dimension rather than by brand, and NEXTEEL [CONFIDENTIAL TEXT DELETED – domestic sales approach].

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

In the domestic market the goods are used principally as structural members in building structures (including steel columns and beams), civil engineering structures, and plant and machinery structures.

The end uses of domestically produced goods and imported goods are the same; end use does not differ according to origin.

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.

The key attributes influencing purchasing decisions in the domestic market are (i) conformity with the specification required by the customer, including dimensional tolerance and mechanical properties, (ii) price, (iii) delivery lead time, and (iv) security of supply.

Because the goods are standard specification products, once the specification requirements are met price and delivery are the decisive factors. Brand or producer reputation has little influence on the purchasing decision.

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

Depending on the application, other structural sections products such as steel H-beams and angles, or concrete structural elements, may be substituted for the goods at the design stage. Once the specification and structural design have been settled, however, substitution does not occur.

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.

To the best of NEXTEEL's knowledge there has been no material change in the structure of demand or in customer preferences in the domestic market for the goods over the last five years. The goods continue to be purchased on the basis of conformity with specification and price.

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.

Sales in the domestic market are an important part of NEXTEEL's operations. The proportion of NEXTEEL's sales revenue and profit derived from domestic sales of the goods during the investigation period (1 April 2025 – 31 March 2026) is set out below. NEXTEEL's accounting system [CONFIDENTIAL TEXT DELETED – accounting information and information regarding percentage of revenue and profit derived from sales of 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.

NEXTEEL is not the price leader for the goods in the domestic market. A number of steel pipe producers compete in the domestic market and NEXTEEL's market share is not at a level that would allow it to lead prices.

NEXTEEL sets its prices [CONFIDENTIAL TEXT DELETED – domestic price determination factors].

As noted above, the Korean domestic market is supplied by a number of producers that are substantially larger than NEXTEEL, including SeAH Steel Corporation, Husteel Co., Ltd., Kumkang Industrial Co., Ltd. and Miju Steel Mfg. Co., Ltd. NEXTEEL is a comparatively small producer that concentrates on higher-specification products, and it does not have the volume or the market presence required to set or lead domestic price

levels. NEXTEEL is a price taker that must respond to the price levels established by the larger domestic producers and to movements in the purchase price of hot-rolled coil.

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.

NEXTEEL's domestic pricing is not directed at market penetration or inventory clearance. NEXTEEL's domestic pricing is [CONFIDENTIAL TEXT DELETED – price determination factors].

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.

NEXTEEL's sales team [CONFIDENTIAL TEXT DELETED – price determination factors and process].

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.

NEXTEEL's domestic selling [CONFIDENTIAL TEXT DELETED – price determination review frequency and process].

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]

The factors influencing NEXTEEL's domestic pricing decisions are ranked below, with 1 being the most influential.

[CONFIDENTIAL TEXT DELETED – ranking of price determination factors]

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?

> **Domestic selling prices are [CONFIDENTIAL TEXT DELETED – price determination factors].**

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.

> **NEXTEEL provided [CONFIDENTIAL TEXT DELETED – information regarding price reductions].**

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.

> **[CONFIDENTIAL TEXT DELETED – information regarding bundled pricing].**

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.

> **As indicated above, NEXTEEL's selling [CONFIDENTIAL TEXT DELETED – price determination factors].**

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.

> **NEXTEEL does [CONFIDENTIAL TEXT DELETED – information regarding use of sales contracts].**

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.

NEXTEEL does not use price lists for the goods in the domestic market, and there are accordingly no price lists to provide. Domestic selling prices are established by [CONFIDENTIAL TEXT DELETED – price determination factors]. Because customers routinely obtain and compare quotations from several domestic suppliers before placing an order, price levels in the domestic market are transparent to buyers.

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.

Price differences between products are based on [CONFIDENTIAL TEXT DELETED – price differentiation factors].

NEXTEEL does [CONFIDENTIAL TEXT DELETED – price differentiation process and documentation].

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.

As discussed above in Section D, during the inquiry period NEXTEEL had [CONFIDENTIAL TEXT DELETED – types of trade, tiering, segmentation and pricing determination information].

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.

NEXTEEL did not sell the goods to any related entity in the domestic market during the period.

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.).

The goods are standard specification products and are sold through repeat dealings with existing customers and direct contact by NEXTEEL's sales team. NEXTEEL does not undertake consumer advertising or promotional activity for the goods.

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.

NEXTEEL [CONFIDENTIAL TEXT DELETED – domestic sales approach].

The goods are traded by reference to specification and dimension rather than brand, and product marking is limited to specification, dimensions and producer identification (see the response to question 1 of Section J-2).

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.

NEXTEEL has not conducted any mass advertising of the goods in the domestic market over the past five years. The goods are an industrial intermediate product and are not sold by means of advertising; sales are made through direct contact by the sales team and by quotation.

NEXTEEL's promotional activity for the goods in the domestic market during the investigation period was limited to the publication of company and product information on its website and the provision of product catalogues to customers. Copies of the relevant website material and product catalogue are provided at Exhibit J-1.1.(a).

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.

During the investigation period NEXTEEL's domestic sales team comprised [CONFIDENTIAL TEXT DELETED – sales team numbers and locations].

Sales staff are remunerated by [CONFIDENTIAL TEXT DELETED – information regarding remuneration and performance pay].

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.

Sales staff are provided [CONFIDENTIAL TEXT DELETED – information regarding pricing parameters].

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

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

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

   (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

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

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

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

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

   (i) Describe any other factors that are 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).

NEXTEEL is a relatively new exporter for the goods to Australia and did not sell or distribute the goods within Australia. As such, NEXTEEL understanding of the Australian market is relatively limited. Nonetheless, NEXTEEL provide its response based on its interaction with customer and publicly available information, as follows.

(a) Overall description and trend over the last five years

NEXTEEL does not itself sell or distribute the goods within Australia and is therefore not in a position to confirm the overall size of that market or its precise trend over the past five years. To NEXTEEL's understanding, the goods are standard specification products used in building and civil construction applications, and demand varies with the level of building and infrastructure investment activity in Australia.

(b) Sources of demand and categories of customer

NEXTEEL understands that demand for the goods in Australia arises from distributors of structural steel and from steel fabricators serving the building and civil construction sectors.

(c) Estimated proportion (%) of sales revenue from each source of demand

During the investigation period, NEXTEEL's sales to Australia [CONFIDENTIAL TEXT DELETED –Australian sales information].

(d) Factors influencing demand variability

NEXTEEL understands the principal factor to be the level of building and infrastructure investment activity in Australia.

(e) Market segmentation

According to NEXTEEL's understanding the Australian market is differentiated by specification and dimension. NEXTEEL is not in a position to confirm whether geographic segmentation exists.

(f) Estimated proportion of sales revenue from each segment

NEXTEEL is not in a position to identify the segments of the Australian market and is therefore unable to estimate the proportion of sales revenue attributable to each segment.

(g) Competition between Australian manufactured and imported goods

The goods are standard specification products and, where the required specification is met, compete on price and delivery irrespective of origin.

(h) Marketing and distribution

NEXTEEL sells to [CONFIDENTIAL TEXT DELETED – Australian sales information].

(i) **Other relevant factors:**

Other than the matters described above, factors affecting the Australian market generally are outside NEXTEEL's knowledge and NEXTEEL is not in a position to confirm them.

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.

During the investigation period NEXTEEL's channel for sales to Australia comprised:

[CONFIDENTIAL DIAGRAM AND TEXT DELETED – information regarding Australian sales channels]

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.

As a new exporter, NEXTEEL is unfamiliar with the commercially significant participants in the Australian market as a whole, or their respective market shares. NEXTEEL's knowledge is limited to [CONFIDENTIAL TEXT DELETED – NEXTEEL Australian sales information].

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.

As a new exporter, NEXTEEL is unfamiliar with the commercially significant importers in the Australian market or their market shares.

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.

To NEXTEEL's understanding the major regulatory framework of the Australian market are the competition laws, tax laws, customs regulations and tariff regimes, and the trade remedies regimes. Other major factors include product standards and construction codes.

6. Describe any entry restrictions for new participants into the Australian market for the goods. Your response could include information on:

   - resource ownership
   - patents and copyrights
   - licenses
   - barriers to entry
   - import restrictions and
   - government regulations (including the effect of those government regulations).

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

As a new exporter to the Australian market, NEXTEEL is not in possession of sufficient information about entry restrictions in the Australian market. Nonetheless, in the spirit of cooperation, NEXTEEL offers its response to the extent of its understanding as follows.

- **Resource ownership - NEXTEEL is unaware of any restriction.**
- **Patents and copyrights - the goods are manufactured to published standard specifications and NEXTEEL is unaware of any patent or copyright restriction.**
- **Licenses - NEXTEEL is unaware of any licensing regime specific to the importation or sale of the goods.**
- **Barriers to entry - NEXTEEL understands the practical barriers to be obtaining certification to the Australian standard and establishing local distribution.**
- **Import restrictions - the goods are subject to anti-dumping and countervailing measures, which increase the cost of importation and so affect entry.**
- **Government regulations and their effect - apart from the trade remedy measures referred to above, the market may also be influenced by building and construction regulations as well as relevant policies affecting the sectors.**

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.

The goods NEXTEEL supplies to the Australian market are distinguished by the specification nominated by the customer [CONFIDENTIAL TEXT DELETED – specification], shape (circular and square/rectangular), outside diameter and wall thickness. The full range of goods sold in the Australian market as a whole is beyond NEXTEEL's knowledge.

- **Quality differences.**

The goods are standard specification products and, where the required specification is met, there is little difference in quality between producers or origins.

- **Price differences.**

Prices vary according to specification, dimensions, order quantity and the timing of the order.

- **Supply and availability differences.**

NEXTEEL does not hold information as to inventory levels or delivery lead times within Australia. NEXTEEL's sales to Australia are, however, produced and shipped against the importer's order, so a lead time applies between order and delivery and a minimum order quantity applies by reference to shipment lots, whereas goods manufactured in Australia or held in local inventory can, as NEXTEEL understands it, be supplied over a shorter period.

- **Technical support differences.**

As the goods are standard specification products, after-sales technical support is not a material factor in purchasing decisions.

- **Private labels, generic labels and premium labels.**

NEXTEEL does not sell the goods to Australia on a branded basis. Product marking is limited to specification, dimensions and producer identification.

- **Product segmentation.**

To NEXTEEL's understanding the Australian market is differentiated by specification and dimension.

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

NEXTEEL understands that in the Australian market the goods are used principally as structural members in building structures (including steel columns and beams), civil engineering structures, and plant and machinery structures, being the same end-use categories as those given in the response to question 2 of Section J-2.

NEXTEEL understands the end uses of Australian manufactured and imported goods to be the same.

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.

NEXTEEL understands the key attributes influencing purchasing decisions in the Australian market to be (i) conformity with the required specification, including AS/NZS, dimensional tolerance and mechanical properties, (ii) price, (iii) delivery lead time, and (iv) security of supply.

Because the goods are standard specification products, once the specification requirements are met price and delivery are the decisive factors, and brand or producer reputation has little influence on the purchasing decision. NEXTEEL understands, however, that certification to the Australian standard carries greater weight in the Australian market than in the domestic market.

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

Depending on the application, sections such as H-beams and angles, or concrete structural elements, may be substituted for the goods at the design stage. Once the specification and structural design have been settled, substitution does not occur.

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

NEXTEEL is not aware of any commercially significant market complements for the goods in the Australian market.

The goods are steel products used in the construction of structures, and consumables such as welding materials and coatings are used alongside them; those items do not, however, determine demand 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.

As a new exporter of the goods to the Australian market, NEXTEEL is unfamiliar with the market changes over 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.

Australian market for the goods is a new market destination for NEXTEEL and account for minimal portion of NEXTEEL's overall operation – less than [CONFIDENTIAL TEXT DELETED – percentage information]. Please refer to information already provided in B-4 for further details. In terms of profit, all of NEXTEEL's Australian sales are profitable.

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.

> **NEXTEEL is a new entrant to the Australian market with negligible level of export. NEXTEEL is not the price leader for the goods in the Australian market.**
>
> **The Australian market is mostly influenced by the two domestic producers and the imports from major suppliers. NEXTEEL is not in possession of information from which the total size of the Australian market or the price levels of individual participants can be determined, and it is therefore unable to calculate its market share or to identify a price leader.**

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.

> **NEXTEEL's pricing for sales to Australia is not directed at market penetration or inventory clearance. As shown from its Australian sales record, Australian market represent an emerging market destination for NEXTEEL as a new market entrant. NEXTEEL's pricing for Australian market is consistent with its domestic market, namely a [CONFIDENTIAL TEXT DELETED – NEXTEEL Australian sales pricing model].**

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.

> **NEXTEEL's sales team prepares [CONFIDENTIAL TEXT DELETED – price determination factors]. [CONFIDENTIAL TEXT DELETED – sales and price determination process]. The cost items reflected in the quotation depend on the delivery terms agreed (FOB, CFR and the like).**

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.

> **NEXTEEL's Australian selling prices are [CONFIDENTIAL TEXT DELETED – information regarding price review process].**

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]

The factors influencing NEXTEEL's pricing decisions for the Australian market are ranked below, with 1 being the most influential. [CONFIDENTIAL TEXT DELETED – price determination factors ranking]

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.

Australian selling prices are set at a level intended to recover the cost to make and sell, export-related costs and selling expenses, and to achieve a margin.

8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Australian market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.

[CONFIDENTIAL TEXT DELETED – information regarding price reductions].

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.

NEXTEEL does [CONFIDENTIAL TEXT DELETED – information regarding bundled price offerings].

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.

[CONFIDENTIAL TEXT DELETED – treatment of volume in price determination].

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?

    (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.

NEXTEEL does [CONFIDENTIAL TEXT DELETED – information regarding use of sales contracts in the Australian market].

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.

NEXTEEL does not use price lists for the goods in the Australian market, and there are accordingly no price lists to provide. Australian selling prices are established by [CONFIDENTIAL TEXT DELETED – price determination process].

13. How do you differentiate pricing for different products/models of the goods in the Australian market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost to make or selling cost differences between differentiated products. Describe how these cost differences (if any) influence pricing decisions. Provide copies of internal documents which support your claims in response to this question.

Price differences between products are based on [CONFIDENTIAL TEXT DELETED – information regarding price differentiation and documentation].

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.

NEXTEEL does [CONFIDENTIAL TEXT DELETED – information regarding tiers and segmentation]. Price is determined [CONFIDENTIAL TEXT DELETED – price determination process].

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.

NEXTEEL did not sell the goods to any related entity in Australia during the investigation period. Sales to Australia were [CONFIDENTIAL TEXT DELETED – Australian customer information].

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.).

NEXTEEL does not undertake consumer advertising or promotional activity in the Australian market. The goods are standard specification products and are sold through [CONFIDENTIAL TEXT DELETED – Australian sales process]. The value proposition

offered by NEXTEEL is quality, reliable and on-time supply, and reasonable and sustainable pricing.

Whereas domestic sales are made through direct contact between NEXTEEL's sales team and customers, sales to Australia are made [CONFIDENTIAL TEXT DELETED – Australian sales channels]. Other than the publication of company and product information on its website and the provision of product catalogues, NEXTEEL incurred no marketing or advertising expenditure in relation to its Australian sales of the goods.

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.

NEXTEEL does not conduct brand segmentation in the Australian market. The goods are traded by reference to specification and dimension rather than brand, and product marking is limited to specification, dimensions and producer identification.

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.

NEXTEEL has not advertised the goods in the Australian market over the past five years. The goods are an industrial intermediate product and are not sold by means of advertising; sales are made through direct contact with the Australian importer and by quotation.

NEXTEEL's promotional activity in relation to Australian sales during the investigation period was limited to the publication of company and product information on its website and the provision of product catalogues to the importer.

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.

Export sales, including sales to Australia, are handled by NEXTEEL's overseas marketing department. During the investigation period that department comprised [CONFIDENTIAL TEXT DELETED – sales team numbers, location and operation details].

Those staff are remunerated by [CONFIDENTIAL TEXT DELETED – renumeration basis].

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.

Sales staff are provided [CONFIDENTIAL TEXT DELETED – information regarding pricing parameters and process].

PUBLIC RECORD

EXPORTER'S DECLARATION

I hereby declare that NEXTEEL Co., Ltd has 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.

[CONFIDENTIAL TEXT DELETED – personal employee information]