Australian Government
Department of Industry, Science and Resources

Anti-Dumping Commission

Exporter Questionnaire

Case number: 716

Product: Zinc coated (galvanised) steel

From: The Republic of India, Malaysia and the Socialist Republic of Vietnam

Inquiry period: 1 July 2025 – 31 June 2026 (the period)

Response due by: 16 October 2026 Further response received 12 November 2026

Email enquiries to: investigations@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 zinc coated (galvanised) steel (the goods) exported to Australia from the Republic of India, Malaysia and the Socialist Republic of Vietnam.

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 zinc coated (galvanised) steel is dumped. The commission will also use this information to determine whether zinc coated (galvanised) steel 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 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 subsidy margin. The commission considers that the dumping margin and subsidy margin is 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.

Section	**Complete this attachment if you are an exporter from the following markets**	Please tick if you have responded to all questions
Section A Company information	India, Malaysia and Vietnam	☐
Section B Export sales to Australia	India, Malaysia and Vietnam	☐
Section C Exported goods & like goods	India, Malaysia and Vietnam	☐
Section D Domestic sales	India, Malaysia and Vietnam	☐
Section E Due allowance	India, Malaysia and Vietnam	☐
Section F Third country sales	India, Malaysia and Vietnam	☐
Section G Cost to make and sell	India, Malaysia and Vietnam	☐
Section I Countervailing	India	☐
Section J Domestic Market	India, Malaysia and Vietnam	☐
Section K Australian Market	India, Malaysia and Vietnam	☐
Exporter's declaration	India, Malaysia and Vietnam	☐
Non-confidential version of this response	India, Malaysia and Vietnam	☐

Attachments	**Complete this attachment if you are an exporter from the following markets**	Please tick if you have provided spreadsheet
B-2 Australian sales	India, Malaysia and Vietnam	☐
B-2.2 Australian sales source	India, Malaysia and Vietnam	☐
B-4 Upwards sales	India, Malaysia and Vietnam	☐
D-2 Domestic sales	India, Malaysia and Vietnam	☐
D-2.2 domestic sales source	India, Malaysia and Vietnam	☐
F-2 Third country sales	India, Malaysia and Vietnam	☐
F-2.2 third country sale source	India, Malaysia and Vietnam	☐
G-3 Domestic CTM	India, Malaysia and Vietnam	☐
G-3.2 domestic CTM source	India, Malaysia and Vietnam	☐
G-4.1 SG&A listing	India, Malaysia and Vietnam	☐
G-4.2 Dom SG&A calculation	India, Malaysia and Vietnam	☐
G-4.3 Upwards SG&A	India, Malaysia and Vietnam	☐
G-5 Australian CTM	India, Malaysia and Vietnam	☐
G-5.2 Australian CTM source	India, Malaysia and Vietnam	☐

G-7.2 Raw material CTM	India, Malaysia and Vietnam	☐
G-7.4 Raw material purchases	India, Malaysia and Vietnam	☐
G-8 Upwards costs	India, Malaysia and Vietnam	☐
G-10 Capacity Utilisation	India, Malaysia and Vietnam	☐
I-1 Company Turnover	India	☐
I-2 Raw Material Purchases (if required)	India	☐
I-3 Income Tax	India	☐
I-4 Grants	India	☐
I-5 Preferential Loans	India	☐

GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

The goods under consideration (the goods) i.e. the goods exported to Australia, allegedly at dumped prices and in receipt of countervailable subsidies, are:

The goods subject to anti-dumping measures (the goods) are:

The goods subject to the anti-dumping measures and this inquiry are:

> *flat rolled iron or steel products (whether or not containing alloys) that are plated or coated with zinc exported to Australia from India, Malaysia and Vietnam. These goods are generically called 'galvanised steel'. Galvanised steel of any width is included in this application.*

These goods do not include painted galvanised steel, pre-painted galvanised steel, electro-galvanised steel, corrugated galvanised steel or zinc alloy coated or plated steel.

Additional information

The goods include the same categories of goods as identified in Trade Measures Report No. 190 and 193, however, this application also includes goods that are alloyed (i.e. with minor additions, e.g. boron, chromium, etc). The goods the subject of this application include all zinc coated product options, including all grades/models of zinc coated steel, all coating mass classes and all surface treatments.
Trade or further generic names often used to describe the goods the subject of the application include:

- *"GALVABOND®" steel*
- *"ZINCFORM®" steel*
- *"GALVASPAN®" steel*
- *"ZINCHITEN®" steel*
- *"ZINCANNEAL" steel*
- *"ZINCSEAL" steel*
- *Galv*
- *GI*
- *Hot Dip Zinc coated steel*
- *Hot Dip Zinc/Iron alloy coated steel*
- *Galvanneal*

The amount of zinc coating on the steel is described as its coating mass and is nominated in grams per meter squared (g/m2) with the prefix being Z (Zinc) or ZF (Zinc converted to a Zinc/Iron alloy coating). The common coating masses used for zinc coating are: Z350, Z275, Z200/Z180, Z100, and for zinc/iron alloy coatings are ZF100, ZF80 and ZF30 or equivalents based on international standards and naming conventions.
Surface treatments can include but not be limited to; passivated or not passivated (often referred to as chromated or unchromated), oiled or not oiled, skin passed or not skin passed, phosphated or not phosphated (for zinc iron alloy coated steel only).
There are a number of relevant International Standards for zinc coated products that cover their own range of products via specific grade designations, including the recommended or guaranteed properties of each of these product grades. These relevant standards are noted below in Table 1.

International Standards	Product Grade Names
General and Commercial Grades	
AS/NZS 1397	G1, G2
ASTMA 653/A 653M	CS type A, B and C
EN 10346	DX51D, DX52D
JIS 3302	SGCC, SGHC
Forming, Pressing & Drawing Grades	
AS/NZS 1397	G3
ASTMA 653/A 653M	FS, DS type A and B
EN 10346	DX53D, DX54D
JIS 3302	SGCD, SGCDD
Structural grades	
AS/NZS 1397	G250, G300, G350, G450, G500, G550
ASTMA 653/A 653M	33 (230), 37 (255), 40 (275), 50 (340), 55 (380), 80 (550)
EN 10346	S220GD, S250GD, S280GD, S320GD, S350GD, S550GD
JIS 3302	SGC340, SGC400, SGC440, SGC490, SGC570, SGH340, SGH400, SGH440, SGH490, SGH570

Table 1: Relevant International Standards for zinc coated steel

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 Dumping Commodity Register (DCR) [1] for the goods.

The goods are generally, but not exclusively, classified to the following tariff subheadings (Table 2, below) of Schedule 3 to the *Customs Tariff Act 1995*[2]:

Tariff Subheading	Statistical Code	Description
7210	FLAT-ROLLED PRODUCTS OF IRON OR NON-ALLOY STEEL, OF A WIDTH OF 600 mm OR MORE, CLAD, PLATED OR COATED	
7210.49.00	55	Of a thickness of less than 0.5 mm
	56	Of a thickness of 0.5 mm or more but less than 1.5 mm
	57	Of a thickness of 1.5 mm or more but less than 2.5 mm
	58	Of a thickness of 2.5 mm or more
7212	FLAT-ROLLED PRODUCTS OF IRON OR NON-ALLOY STEEL, OF A WIDTH OF LESS THAN 600 mm, CLAD, PLATED OR COATED	
7212.30.00	61	- Otherwise plated or coated with zinc
7225	FLAT-ROLLED PRODUCTS OF OTHER ALLOY STEEL, OF A WIDTH OF 600 mm OR MORE:	
7225.92.00	38	-- Otherwise plated or coated with zinc
7226	FLAT-ROLLED PRODUCTS OF OTHER ALLOY STEEL, OF A WIDTH OF LESS THAN 600 mm:	
7226.99.00	71	-- Other

Table 2: General tariff classification for the goods

[1] A list of excluded goods is available on the commission's DCR.
[2] 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 are 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.

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	Alloy content	Alloy	A	Mandatory	N/A
		Non-alloy	NA		
2	Prime	Prime	P	Mandatory	N/A
		Non – Prime	N		
3	Steel Base	Hot Rolled	H	Mandatory	Mandatory
		Cold Rolled	C		
4	Coating Type	Zinc Coated (Z)	Z	Mandatory	Mandatory
		Zinc / Iron Alloy Coating (ZF / F)	F		
5	Coating Mass	<= 100 g/m2	1	Mandatory	Mandatory
		>100 g/m2 to ≤ 220 g/m2	2		
		> 220 g/m2 to ≤ 300g/m2	3		
		> Z300 g/m2 to ≤ 400 g/m2	4		
		> 400 g/m2	5		
6	Steel Grade	G2 / SGCC / SGHC	A	Mandatory	Mandatory
		G3 / SGCD	B		
		G250 / SGC 340 / SGHC 340 / SGC 340 / SGHC 340	C		
		G300 / G350 / SGC 400 / SGHC 400 / SGC 440 / SGCH 440 / SGC 490 / SGHC 490	D		
		G450 / G500	E		
		G550 / SGC 570	F		
		Other	G		
7	Base Metal Thickness	< 0.40 mm	1	Mandatory	Mandatory
		≥ 0.40 mm to < 0.50 mm	2		
		≥ 0.50 mm to < 0.75 mm	3		
		≥ 0.75 mm to < 1.00 mm	4		
		≥ 1.00 mm to < 1.50 mm	5		
		≥ 1.50 mm to < 2.00 mm	6		
		≥ 2.00 mm to < 2.50 mm	7		
		≥ 2.50 mm	8		
8	Width	< 600 mm	A	Mandatory	Optional
		≥ 600 mm to ≤ 1220mm	B		
		> 1220mm	C		
9	Form	Coil	C	Mandatory	Optional
		Sheet	S		

Table 3: MCC Structure

In constructing a MCC, use a "-" between each category. For example: A-P-H-Z-1-A-1-A-S.

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:	*Ms. ZHANG, Yuan-Yu; Ms. NGUYEN Thi Tam*
Position in the company:	*Section Manager; Senior Administrator*
Telephone:	*+84-28-54-161-035 (Ext:110, 131)*
E-mail address:	*D01735@csvc.com.vn; w17277@csvc.com.vn*

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

Name:	*Mr. John Bracic*
Address:	*J.Bracic & Associates*
	PO Box 3026, Manuka, ACT 2603
Telephone:	*+61 499 056 729*
E-mail address:	*john@jbracic.com.au*

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 of the where your company's financial records are held.

   ANS.

   An`ct, Ba Ria – Vung Tau Province, Vietnam.

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

   ANS.

   The production records are kept at My Xuan A2 Industrial Zone, My Xuan Commune, Tan Thanh District, Ba Ria – Vung Tau Province, Vietnam.

5. Please provide the location of your company's production plant manufacturing the goods under consideration.

   ANS.

   The location of production plant is My Xuan A2 Industrial Zone, My Xuan Commune, Tan Thanh District, Ba Ria – Vung Tau Province, Vietnam.

A-2 Company information

1. What is the legal name of your business?

   ANS.

   The legal name of the company is CHINA STEEL AND NIPPON STEEL VIETNAM JOINT STOCK COMPANY (hereafter "CSVC").

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

ANS.

CSVC has no other business names.

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

ANS.

CSVC has no other business names.

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

ANS.

A list of current board of director as of 21st September, 2026 and the changes in last two years is provided as CSVC-Exhibit A-2.4.

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

ANS.

CSVC is a subsidiary of China Steel Corporation ("CSC"). Please refer to the 1st tab of Exhibit A-2.5 for CSC group chart.

CSC owns more than 50 percent of the shares of CSVC (see response to following A-2.6). Additionally, the ultimate holding company of CSVC is CSC. The note pertaining to structure of ownership is also disclosed in CSVC's Audited FS, see page 9 of Exhibit D6.

A list of CSVC's related companies with its function is provided in the 2nd tab of Exhibit A-2.5. The related parties reported are consistent with those disclosed in the Company's audited financial statements.

6. Is your company or parent company publicly listed?

If yes, please provide:

(a) The stock exchange where it is listed and

(b) Any principal shareholders[3]

If no, please provide:

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

ANS.

CSVC itself is not publicly listed.

CSC, the parent company of CSVC, is a publicly traded company and listed in the Taiwan Stock Exchange. As such, the holding of each shareholder may vary by trading in the stock market.

[3] 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.

Based on the shareholders' roster dated December 31, 2025, only one shareholder (i.e. Ministry of Economic Affairs) owns more than 5% of CSC's shares, whose percentage of shareholding is 20%.

In CSVC's regarding, the shareholding information reported as follows:

No.	*Shareholder name*	*Percentage of shares in CSVC*
1	*China Steel Corporation ("CSC")**	*56%*
2	*Nippon Steel Corporation ("NSC")*	*30%*
3	*Formosa Ha Tinh Steel Corporation ("FHS")*	*5%*
4	*Nippon Steel Trading Corporation ("NST")*	*5%*
5	*Chun Yuan Steel Industry Co., Ltd*	*2%*
6	*Hsin Kuang Steel Co., Ltd.*	*2%*
Source: https://www.csvc.com.vn/about-3.html ** The ultimate holding company is CSC, see the footnote 1 of CSVC's audited financial statement (Exhibit A-4.1.a, p.35)*		

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.

   ANS.

   CSVC is a producer of high-class steel products, including Pickled and Oiled Steel Coils (PO), As Cold-Rolled Steel Sheets ("ASCR"), Cold-Rolled Steel Sheets ("CR"), Hot-dipped Galvanized/Galvannealed Coils (GI/GA), and Electrical Steel Coils ("ES").

   CSVC produces and sells the goods in the domestic and foreign markets including Australia. Please note that CSVC exported the subject product to Australia with limited quantity during POR.

8. If your business does not perform all of the following functions in relation to the goods under consideration, 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.

   ANS.

   CSVC produces and sells the goods in domestic market and to foreign countries.

9. Provide your company's internal organisation chart.

   ANS.

   CSVC is organized into 3 principal divisions and 15 departments, which are structured based on functions. Please refer to Exhibit A-2.9 for the Internal Organization Chart.

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

    ANS.

    CSVC's Commercial Division is responsible for CSVC's procurement of input materials, sales to home-market and export markets sales, marketing activities, and transportation arrangement for CSVC's products. The domestic and export sales of CSVC's GI products are handled by this Division.

CSVC's Production Division is responsible for CSVC's production and plant-management activities. There are eight departments within the Production Division. Cold Rolling Department (P2) is the production unit involving producing the upstream inputs of the goods. Its Pickling and Tandem Cold-Rolling Mill ("PLTCM"), which is composed of the PLTCM Section (P21), the Roll Shop Section (P22) and the Acid Recycle Plant Section (P23). Annealing & Galvanizing Department (P3) is production unit involving producing the goods.

CSVC's Management Division is responsible for general administration activities at CSVC, including human resources, and public relationship, for CSVC's financial and accounting activities, as well as for development, operation and maintenance of its information systems.

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

    ANS.

    CSVC's GI product catalogue is provided in Exhibit A-2.11.

A-3 General accounting information

1. What is your financial accounting period?

    ANS.

    CSVC's normal corporate financial accounting period is calendar year (from January 1st to December 31st).

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

    ANS.

    Yes, CSVC's financial accounts are audited by Deloitte Vietnam.

3. What currency are your accounts kept in?

    ANS.

    CSVC's accounts are kept in USD.

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

    ANS.

    CSVC uses a typical Enterprise Resource Planning ("ERP") system developed by InfoChamp for Financial Accounting system.

5. What is the name of your sales system?

    ANS.

    CSVC uses a typical Enterprise Resource Planning ("ERP") system developed by InfoChamp for sales system.

6. What is the name of your production system?

    ANS.

    CSVC uses a typical Enterprise Resource Planning ("ERP") system developed by InfoChamp for production 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.

   ANS.

   The questions is not applicable to CSVC because it uses the same ERP system to electronically maintain and manage the systems, as well as to generate a variety of reports under different systems.

   The flowcharts of financial and cost accounting system are provided in Exhibit A-3.7.

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

   ANS.

   Not applicable. CSVC accounting practices are consistent with the generally accepted accounting principles in Vietnam.

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

   ANS.

   No. There was no change in accounting methods over the last two financial years.

   As for the significant accounting policies regarding the preparation of financial statements, please see Note 3 of CSVC's 2025 audited financial statements provided in Exhibit A-4.1.a, at pages 36~39.

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.

   ANS.

   Please refer to Exhibit A-4.1.a for CSVC's Audited Financial Statements for 2024 and 2025.

   CSVC's related companies involved production ([redacted] [role of the related companies in production]*) and sales of the merchandise under consideration in accordance with the footnote no. 22 of Exhibit A-4.1 audited financial statements, are also provided in Exhibits A-4.1.b to d identified below:*

   Exhibits A-4.1.b — China Steel Corporation (CSC), [redacted] [role of CSC in supplying CSVC].

   Exhibits A-4.1.c — [redacted] [name of a further CSC group company and its role in supplying CSVC]

   Exhibits A-4.1.d (consolidated report) — NSC, [redacted] [role of NSC, and of an NSC group company, in supplying CSVC].

   Exhibits A-4.1.e— [redacted] [name of the related company and its role in relation to the goods].

Exhibits A-4.1.f — [redacted] [name of the related company, its group affiliation and the service it provides to CSVC].

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.

   ANS.

   Not applicable, no audit management letters were issued from the independent auditor to CSVC as no deficiency was found in internal control system.

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.

   ANS.

   Not applicable. All available financial reports provided in A-4.1 are 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.

   ANS.

   CSVC does not have divisional, factory/facility or product-specific income statements, i.e. it do not maintain different profit centres. The income statements present the company as a whole.

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.

   ANS.

   The Income statements of the most recent financial period i.e. 2025 and POR are provided in 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.

   ANS.

   Please refer to Exhibit A-4.6 for CSVC's trial balance of year 2025 and POR.

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

   ANS.

   Please refer to Exhibit A-4.7 for CSVC's chart of accounts.

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

SECTION B
EXPORT SALES TO AUSTRALIA

B-1 Australian export sales process

1. Provide details (and diagrams if appropriate) of the export sales process of your company and representatives (e.g. agents) including:

   (a) Marketing and advertising activities

   (b) Price determination and/or negotiation process

   (c) Order placement process

   (d) Order fulfilment process and lead time

   (e) Delivery terms and process

   (f) Invoicing process

   (g) Payment terms and process

   ANS.

   Please see Exhibit B-1.1.a for a flow chart explaining the sales process, including order placement, order fulfilment, lead time etc, and Exhibit B-1.1.b for flow chart of distribution channel showing the invoice and delivery flows as well as delivery term.

   CSVC has no Marketing and advertising activities.

   Prices offered were based on negotiation between both parties and determined by individual business entity considering the market competition. Each inquiry would be reviewed by CSVC on a case-by-case basis before price being offered to the customer. The customer can choose to negotiate on the price offered, which may or may not be accepted by CSVC. Shall both parties reach an agreement, a sales contract will be sent to the customer to confirm the quantities, prices, delivery term and the delivery schedule for the ordered products.

   After certain production lead-time, CSVC would notify buyers to pay by letter of credit at sight or cash. Upon receipt of payment, CSVC would arrange shipments to deliver the goods to its nearby seaport for loading by incoming vessel. When the product is shipped with shipment documents, CSVC issues its commercial invoice to its customer as well.

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?

   ANS.

   CSVC invoices Australian customers in USD; and the foreign currency accounts CSVC owns are confidentially provided as below:

   1. Bank name: [redacted]

Swift code: [redacted]
Address: [redacted]
Beneficiary: [redacted]
Bank acocunt: [redacted] [name, SWIFT code and address of the first bank, the beneficiary name and the account number]

2. Bank name: [redacted]
Swift code: [redacted]
Address: [redacted]
Beneficiary: [redacted]
Bank acocunt: [redacted] [name, SWIFT code and address of the second bank, the beneficiary name and the account number]

CSVC does not use forward contracts to lock in the foreign exchange rate.

The exchange rate follows the rate published by [redacted] [name of the bank whose published exchange rate CSVC uses]*. Since the payment term is L/C at sight and the payment is deposited to CSVC's foreign currency account, the exchange rate would be determined upon settlement, and would follow the aforementioned rate published that day.*

CSVC renews the exchange rate in its system every day in accordance with [redacted] [name of the same bank].

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.

   ANS.

   No, none of the Australia customers were related to CSVC.

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

   ANS.

   Not applicable. CSVC negotiates prices with customers on a transaction-by-transaction basis.

5. 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.

   ANS.

   CSVC exports through one channel only, i.e. [redacted] [the export sales channel used]*, during the investigation period.*

   CSVC's prices [redacted] [whether export prices vary by channel of distribution]*. CSVC's Australian selling prices* [redacted] [how Australian selling prices are set].

6. 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.

   ANS.

[redacted] [whether any discounts, rebates or allowances were offered] *were offered by CSVC for export sales to Australia during POR.*

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 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.

   ANS.

   No credit notes or debit notes were issued by CSVC for export sales to Australia during POR.

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 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.

   ANS.

   CSVC does not claim a date other than the invoice date as the date of sale.

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.

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 have been exempted from anti-dumping duties under 8(7) and section 10(8) of the *Customs Tariff (Anti-Dumping) Act 1975*[4].
   - 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.

[4] A list of excluded goods is available on the commission’s DCR.

- 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.

ANS.

CSVC's Australian sales spreadsheet is provided in Exhibit B-2.1 as instructed.

2. For any sales exported to Australia through an intermediary, add the following to the "B-2 Australian sales spreadsheet" for those transactions:

   a. Name of the end customer in Australia

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

   c. The delivery terms of the sale to that customer

   ANS.

   Not applicable.

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".

   ANS.

   CSVC provided in Exhibit B-2 as instructed.

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.

   ANS.

   Please see Confidential Exhibits B-3.1.a and B-3.1.b for documentation in relation to the following two selected shipments to Australia:

   - *Invoice number:* [redacted] [invoice number of the first selected Australian sale]*; and*

- *Invoice number:* [redacted] [invoice number of the second selected Australian sale].

To ease the reference, CSVC included columns of its "transportation delivery no", "Carriers' Delivery No" and "Voucher No" in the Exhibit B-2.1.

2. 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.

ANS.

Annotations are provided as instructed in B-3.1.a and B-3.1.b.

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.

ANS.

A complete upward-sales is provided as instructed in Exhibit B-4.

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 under consideration and other sales (e.g. non-goods or services)
  - Domestic, Australian and third country sales of the goods under consideration
- 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.

ANS.

The sources are annotated as requested and provided in CSVC's Exhibit B-4.

3. For all amounts 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.

ANS.

CSVC has done so in 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.

   ANS.

   Please refer to Exhibit C-1.1 for the specification including alloy content, prime or non-prime, steel base, coating types, coating mass, steel standard uses, thickness, width, and cost group codes in CSVC's system of the subject merchandise exported to Australia during the POR.

   CSVC's product codes identify only the product group and prime/non-prime, without specification or dimension information; thus MCC was not able to be completely identified merely through product codes. Instead, the information has to source by specific coil ID in order to identify required characteristic e.g. coating mass.

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.

   ANS.

   Please refer to Exhibit C-1.2 for the list of MCCs exported to Australia.

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.

   ANS.

   Please refer to pages 7 through 21 of Exhibit A-2.11 for the product catalogue along with technical specifications of the like good, and see the sample test certificates provided in Exhibit B-3.1 for further technical details.

   We also prepare a list of specifications sold in the domestic market in Exhibit C-2.1.

2. Provide a list of MCCs of like goods sold on the domestic market. This must cover all MCCs listed in the domestic sales listing in D-2.

   - This list must be disclosed in the public record version of the response.

   ANS.

   The list of MCCs listed in the Domestic sales listing in D-2 is provided in Exhibit C-2.2.

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 of 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.

   ANS.

   Please see Exhibit C-3.1 for the list of CSVC's internal product codes. CSVC's product codes identify only the product group, without specification or dimension information; thus MCC was not able to be completely identified merely through product codes. The product codes for the goods (GI) are listed as follows:

Production Line	*Product Code*	*Product Code Description*
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted] [cost centre, internal product codes and descriptions for prime, work in progress, secondary and pup coil product and one by-product]

CSVC additionally uses [redacted] [the identifiers CSVC uses] *to identify each characteristic prescribed by the Commission. The steel grade, steel base, order thickness and width, Spec-mark, physical/ chemical characteristics, Alloy content, Coating Type, Coating Mass are maintained by* [redacted] [the record key used] *in the ERP database (through* [redacted] [name of the ERP record]*). The concordance table between MCC, internal product code and its required information is provided in Exhibit C-1.1 and C-2.1. We also report Coil No. and Lable No in the Australia and Domestic sales listing.*

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

   ANS.

   The sales process is initiated by way of CSVC issuing a quotation to its customers, indicating the quantity and base price. If the customer confirms the quotation, it would either send sales contracts or purchase order to CSVC, including products, specifications, and dimensions by fax or email. CSVC then begins to process the internal sales orders.

   Once production is finished and the relevant goods are ready for delivery, CSVC notifies its customer, and a shipping notice will be issued. When the product is shipped, CSVC issues its invoice – in the form of the standard VAT Invoice, to its customer.

   Please see Exhibit D-1.1.a for a flowchart setting out the sales process for domestic market, and Exhibit D-1.1.b for chart of domestic distribution channel.

   If the customer requires CSVC to arrange delivery, CSVC adds the freight to the goods value and the total value would then be shown on the invoice.

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.

   ANS.

   During the POR, there was [redacted] [number and names of the related customers, their tax codes, their group affiliation, and the activities of two of them in Vietnam].

   As indicated in the response A-2.5 and 2.6, [redacted] [CSVC's reasons, by reference to shareholdings and control, for treating certain customers as not related].

   CSVC's terms of sale and prices do not vary between affiliated and unaffiliated customers.

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

ANS.

[description of CSVC's internal price list: how often it is issued, whether it differs by customer, the factors it reflects, how it is set, and that sales staff may negotiate away from it]

4. 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.

ANS.

[whether domestic prices vary by channel of distribution] *All the prices of the sales in the domestic market are determined by the force of supply and demand in the open market, through negotiation of net prices which also reflect material costs.*

5. 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.

ANS.

During POR, CSVC grants the following types of sales adjustments to all domestic market customers.

Reason Code	***Description***	***Recorded in SS02***
		[codes, descriptions and signs of the two types of domestic price adjustment]

(1) [name and code of the first adjustment]

[explanation of the first adjustment and the column of Exhibit D-2 in which it is reported]

(2) [name and code of the second adjustment]

[explanation of the second adjustment, the column of Exhibit D-2 in which it is reported, and how it is traced and allocated to sales]

6. 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.

ANS.

Not applicable.

7. 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.

   ANS.

   The question is not applicable for CSVC since the Company does not claim a date other than the invoice date as the date of sale.

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.

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-1.8 and/or D-1.7 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.

   ANS.

   Please refer to 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”.

ANS.

Please refer to Exhibit D-2.2 Domestic sales sources. CSVC primarily uses [redacted] [name of the internal sales report] *under sales settlement system to report Exhibit D-2 Domestic sales.*

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.

   ANS.

   Please refer to Exhibit D-3.1.a and Exhibit D-3.1.b for the documents relating to the two largest invoices by invoice value:

   - *Invoice number* [redacted] [invoice number of the first selected domestic sale]*, and*
   - *Invoice number* [redacted] [invoice number of the second selected domestic sale]*.*

2. 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.

   ANS.

   Annotations are provided as instructed in Exhibits D-3.1.a and D-3.1.b.

D-4 Reconciliation of sales to financial accounts

This section is not required if you have completed B-4.

1. Please complete the worksheet named "B-4 Upwards sales" to demonstrate that the sales listings in D-2 and F-2 are complete.
   - You must provide this list in electronic format using the template provided.
   - Please use the currency that your accounts are kept in.
   - If you have used formulas to complete this worksheet, these formulas must be retained.

   ANS.

   A complete upward-sales is provided as instructed in Confidential Exhibits B-4.

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 under consideration and other sales (e.g. non-goods or services)
     - Domestic and third country sales of the goods under consideration
   - 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.

   ANS.

   CSVC's internal income statement, the detailed list of sales revenues and the relate general ledgers for POI are enclosed as instructed in the 2nd and 3rd tab of Exhibits B-4.

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.

   ANS.

   CSVC has done so in Exhibits B-4.

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:

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

ANS.

CSVC uses [redacted] [the arrangements CSVC uses to manage credit risk] *to manage the credit-related costs, and these arrangements apply only to its domestic customers. The payment terms for domestic sales include* [redacted] [the domestic payment terms and credit periods]. [Confidential text removed: how credit insurance operates, the interest charge CSVC applies to credit sales and the column in which it is reported.]

For certain customers with good credit history, CSVC agrees to extend credit terms from [redacted] [range of credit days] *days after delivery.*

The interest revenue (in VND per Kg) is calculated based on the following formula:

[redacted] *[the formula CSVC uses to calculate the credit charge]*

The additional interest revenue is agreed to by the customers and included into the invoice price.

We take customer [redacted] [name and code of the example customer, its credit term and the resulting additional interest charge] *calculated on the basis of the following formula:*

[redacted] [the example calculation, showing the price, exchange rate, interest rate and insurance rate used and the result]

The mechanism above is maintained in the [redacted] [name of the system that holds the mechanism, how often it is updated, the factors that vary the charge between customers, and the range of credit days]

For the unit interest revenue charged to the customer, as CSVC reported in field no. [21.1] of the Exhibit D-2 Domestic Sales, CSVC provides a screen shot Credit Add-price Maintenance System for May 2025 in page 62 of Exhibit D-3.1 as a supporting document.

The additional interest revenue is agreed to by the customers and included into the invoice price. As such CSVC reports the interest revenue in field no. [22] and [22.1] of Exhibt D-2 domestic sales database and such reported adjustment should be deducted from the invoice price in arriving at the ex-work prices. Likewise, we are of the view that the corresponding credit insurance expenses paid (reported under G&A expenses) shall be taken out in performing the profitability test of domestic prices, in order for a symmetric comparison between domestic price and COP.

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?

   ANS.

   During the POR, CSVC had VND and USD short-term borrowing for working capital. The average of VND interest rates were [redacted]*%* [range of VND interest rates] *and USD ones were* [redacted]*%* [range of USD interest rates].

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?

   ANS.

   No. CSVC does not provide term deposits or any cash products.

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?

   ANS.

   No, all sales of like goods to Australian market during POR were on LC at sign (pre-payment basis) as such the questions are not applicable to CSVC.

E-2 Packaging

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

   ANS.

   Please refer to the answers below.

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

ANS.

Please refer to the answers below.

3. If there are distinct differences in packaging between your domestic and export sales:

   (a) Provide details of the differences

   (b) Calculate the weighted average packaging cost for each model sold on the domestic market

   (c) Calculate the weighted average packaging cost for each model exported to Australia

ANS.

CSVC provides two types of packaging, one is paper packing and the other is metal packing. Please refer to page 23 of Exhibit A-2.11. Both packaging types share internal protection components, including VCI anti-rust film/paper, inner board paper, and edge protectors.

Paper packing	Metal packing
Film/paper wrapping/VCI paper + Paper edge protector+ Metal edge protector + Hard board paper + Circumferential strapping + Eye strapping	Film/Paper/VCI paper wrapping+ Paper edge protector + Metal edge protector+ Hard board paper + Circumferential strapping + Eye strapping
	

The aforesaid packing methods do not vary by geographic market. However, CSVC generally uses metal packaging for shipments by sea (including both exports and domestic shipments by vessel in Northern Vietnam). On the other hand, paper packaging usually is used for truck shipments, primarily in Southern Vietnam.

For reporting purposes, CSVC has first calculated the per unit packing costs by domestic and export sales in light of packing materials, manufacturing overhead and labour based on the packing costs actually incurred during the POR. The details of standard packaging used for domestic and export sales, along with packaging cost calculation, are provided in Exhibit E-2.3 Packaging Cost Calculation Sheet.

The packing cost is comprised of purchased packing materials [redacted] [types of packing material] *and packing labour cost. The* [redacted] [type of internal code] *is respectively* [redacted] [the two codes]. *The two cost items are recorded in* [redacted] [name of the cost report] *enclosed in* [redacted] [tab reference] *of Exhibit G-3 CTM. During the POR, the total packing cost were USD* [redacted] [total packing cost], *accounting for* [redacted]*%* [packing cost as a share of total cost] *of total cost of the product under consideration.*

Because CSVC's reported unit production cost has already included packaging cost, we wish to remind ADC that, in performing the profitability test of domestic sales, the packing expense reported in Exhibit D-2 should not be deducted from the invoice price in order for a symmetric comparison between price and cost.

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?

   ANS.

   Yes, [redacted] [share of domestic sales delivered to customers] *of domestic sales of like goods are delivered to the customers. CSVC reports transportation costs on an actual basis. The transportation costs include inland freights and ocean freights if any.*

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

   ANS.

   The delivery terms of the Australian sales agreed is FAS and FOB.

3. If the delivery terms of the Australian sales includes delivery to the port, how was the inland transport calculated in the Australian sales listing in B-2?

   ANS.

   The inland freight is reported on an actual basis in USD. When one transaction includes several product types, the inland freight is allocated by quantity.

   The general ledger account for this expense is [redacted] [general ledger account numbers]

4. If the delivery terms of the Australian sales includes port handling and other export charges, how were these expenses calculated in the Australian sales listing in B-2?

   ANS.

   The column no. 24 port handling and other export charges reported by CSVC, include survey fee, customs declaration fee, local charges, stuffing fee and sea port infrastructure fee. The charges are reported on an actual basis in USD. When one transaction includes several product types, the handling charge is allocated by quantity.

   The general ledger accounts for such charges include [redacted] [general ledger account numbers for these charges].

5. If the delivery terms of the Australian sales includes ocean freight, how was the ocean freight cost calculated in the Australian sales listing in B-2?

   ANS.

   The question is not applicable to CSVC because its Australia sales were either on FOB or FAS basis.

6. If the delivery terms of the Australian sales includes marine insurance, how was the marine insurance calculated in the Australian sales listing in B-2?

   ANS.

Not applicable, as CSVC exported the goods to Australia at FOB and FAS terms during the POR.

7. If the delivery terms of the Australian sales includes delivered duty paid, how were the Australian importation and delivery costs calculated in the Australian sales listing in B-2?

   ANS.

   Not applicable, as CSVC exported the goods to Australia at FOB and FAS terms during the POR.

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.

   ANS.

   CSVC [redacted] [whether commission was paid on domestic and on export sales, to whom, and for what service]*. During the POR,* [redacted] [the rate of commission paid]*. CSVC* [redacted] [reference to the supporting documents provided].

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?

   ANS.

   No tax exemption or drawback applies.

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

   ANS.

   All direct selling expenses have been reported in Exhibit D-2.

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

   ANS.

   All direct selling expenses incurred in relation to Australian sales, including [redacted] [type of direct selling expense] *are reported in Confidential Exhibit B-2. The account code of such* [redacted] [the same expense] *is* [redacted] [account code]*. CSVC* [redacted] [reference to the supporting documents provided].

E-5 Other adjustment claims

5. 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)*[5] for more information.

   ANS.

   This question is not applicable, as CSVC was not aware of any duplication and is not making a claim for other adjustments.

[5] 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.

   ANS.

   For export sales, customers would send their inquiries for price quotation by email. After completing the price negotiation with the customer, a sales contract will be sent to the customer for confirmation of the quantities, prices and delivery schedule for the ordered products. The goods will be shipped to the customers along with commercial invoice and other shipping documents.

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.

   ANS.

   [redacted] [name of a related company, its description in Exhibit F-2, its relationship to CSVC and its role in third country sales].

   CSVC's terms of sale and prices do not vary between affiliated and unaffiliated customers

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.

   ANS.

   The question is not applicable because CSVC does not make such claim.

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.

ANS.

Please refer to Exhibit F-2.1 Third Country Sales.

2. Complete worksheet “F-2.2 third country sales source” listing the source of the data for each column in the worksheet “F-2 third country sales”.

   ANS.

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

F-3 Differences in sales to third countries

1. Are there any differences in sales to third countries which may affect their comparison to export sales to Australia? If yes, provide details.

   ANS.

   There may be a number of differences between CSVC's sales to other third countries which would likely affect comparison, such as different trade terms. Please note that CSVC has sold the identical product concerned with sufficient quantity in the domestic market.

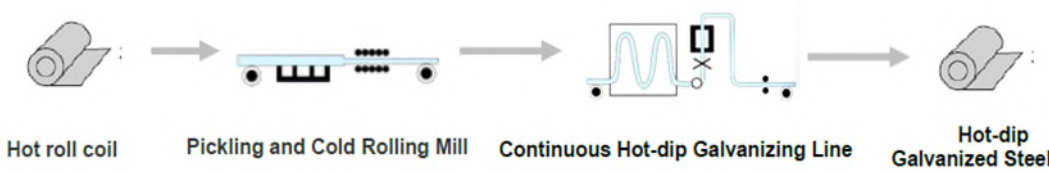
SECTION G
COST TO MAKE AND SELL

G-1 Production process

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

   ANS.

   Hot-dip galvanized steel coils are produced by using as-cold-rolled steel coil as its base material; the typical manufacturing processes are described as below:



   CSVC produces its cold rolled products by the combination line of PLTCM (abbreviated from Pickling and Tandem Cold-rolling Mill), and hot-dip galvanized steel coils by Continuous Hot-dip Galvanizing Line (abbreviated as CGL).

   The detailed production process is provided in Exhibit G-1.1.

   The production of the goods generates the following by-products/scraps at the CGL: [the by-products and scrap generated, with their internal codes].

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.

   ANS.

   During the POR, CSVC purchased hot-rolled steel from [names of the hot-rolled steel suppliers]. *The hot-rolled steels supplied* [names of the producers of that steel]. *The other purchases and services please refer to Note 22 of the CSVC's audit financial statements at pages 24-26 (see Exhibit A-4.1.a).*

G-2 Cost accounting practices

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

   ANS.

   CSVC's cost accounting system is based on actual costs.

   In CSVC's ordinary cost accounting system, the cost for products is [the basis on which product costs are recorded and the level at which they are kept]. *As for the aforesaid by-products, the normal cost accounting system assigns costs to these by-products* [the basis on which by-products are costed]. *The value assigned to*

the by-products is recorded [how the value assigned to by-products is recorded and treated]*.*

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.

   ANS.

   Not applicable. CSVC does not adopt standard costs.

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

   ANS.

   CSVC adopts process costing.

   In CSVC's ordinary cost accounting system, costs are [how costs are accumulated at cost centres, and CSVC's internal term for a group of cost centres]

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.

   ANS.

   Please refer to Exhibit G-2.3 for the list of direct and indirect cost centres under Production Division. In CSVC's cost accounting system, a cost centre is the basic cost collection unit. There are 2 main types of cost centres:

   - Direct cost centres (or Producing cost centres) are units taking part in producing products directly, converting raw material or semi-finished material into product, which may be for captive use or for sales.

   - Indirect cost centres that included (1) Administration cost centres and (2) Service cost centres:

   (1) Administration cost centres are units in charge for controlling, administrating, making plan and supporting production.

   (2) Service cost centres are units providing maintenance service, utility service, etc. to other cost centres.

   Costs incurred by indirect cost centres are charged to the recipient cost centres.

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

   ANS.

In CSVC's ordinary cost accounting system, one average cost is recorded for the product produced at a given cost centre, and within such product group, and it maintains production and inventory costs on the basis of product group. In ordinary cost accounting records, CSVC does not calculate costs separately for each specific specification or type of the subject goods (or non-subject goods).

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

   ANS.

   Not. All production costs are valued in the same methods for cost accounting purposes and for financial accounting purposes.

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

   (a) Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.

   (b) State the total cost of the start-up operation and the way that your company has treated the costs of the start-up operation it its accounting records.

   ANS.

   Not. CSVC did not engage in any relevant start-up operations relating to the goods during the POR.

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)?

   ANS.

   The cost of inventory is calculated on a weighted average basis.

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

   ANS.

   In CSVC's normal cost accounting, [redacted] [how non-prime products are valued and treated in the cost accounts].

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

    ANS.

    The valuation methods CSVC used for scrap, by products is as below:

    - [redacted] [basis on which pup coil and scrap are valued].
    - [redacted] [second category of non-prime product]*:*

      [redacted] [basis of valuing that product in 2025 Q3 and Q4, as a share of a reference price]

      [redacted] [basis of valuing that product in 2026 Q1 and Q2, as a share of a reference price]

    CSVC does not have joint products.

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

ANS.

No. It is not applicable to CSVC, as no management fee/corporate allocation is charged to CSVC by related company.

G-3 Cost to make on domestic market

1. Complete the worksheet named "G-3 Domestic CTM".

- This worksheet lists the quarterly cost to make the domestic models of like goods by MCC manufactured within the period, even if they are models not exported to Australia.
- The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
- If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture like goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
- You must provide this list in electronic format using the template provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.
- If you have claimed in B-1.8 and/or D-1.7 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.

ANS.

Please see Exhibit G-3 for the quarterly cost of MCC for all the goods produced and sold by CSVC on "all markets".

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".

ANS.

CSVC enclosed the [redacted] [name of the cost report] *in the Exhibit C-3 CTM as a supporting document, and organised the concordance table in Exhibit C-3.2 as a source guidance.*

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 under consideration.
- 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.

ANS.

Please see Exhibit G-4.1 for 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.

   ANS.

   Please see Exhibit G-4.2 for 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.

   ANS.

   Please refer to Exhibit G-4.3 Upwards SG&A.
4. Please provide the relevant general ledgers (i.e. the detailed listings) of all SG&A accounts (in Excel) covering the period and the most recent financial year.

   ANS.

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

G-5 Cost to make the goods exported to Australia

5. Complete the worksheet named "G-5 Australian CTM".

   - This worksheet lists the quarterly cost to make the Australian models of the goods under consideration 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-1.8 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.

   ANS.

   Please see Exhibit G-3 for the quarterly cost of MCC for all the goods produced and sold by CSVC on "all markets".

6. Complete worksheet titled "G-5.2 Australian CTM source" listing the source of the data for each column of worksheet "G-5 Australian CTM".

   ANS.

   CSVC enclosed the [redacted] [name of the cost report] *in the Exhibit C-3 CTM as a supporting document, and organised the concordance table in Exhibit C-3.2 as a source guidance.*

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

   ANS.

   As explained in G-2.5 above, CSVC's ordinary accounting practice [redacted] [whether cost of manufacturing is recorded by model]. *Rather, in the books, CSVC calculates* [redacted] [the level at which cost of manufacturing is calculated in the books], *without tracking* [redacted] [the cost differences that are not tracked]. *In order to report the specific 9-characteristic unit cost, CSVC first takes the* [redacted] [source of the costs used] *to calculate the reported* [redacted] [cost element reported]. *These costs* [redacted] [basis of those costs]. *Note that the goods have*

the [redacted] [whether cost differs by destination market].

The cost components for the response purposes are calculated with a detailed explanation as follows:

Direct Materials

- [redacted] [name of the main direct material]

  For CSVC, the main direct material to produce the subject good "GI/GA" is [redacted] [name of the main direct material]. [Confidential text removed: who manufactures that material, what its input is, and where that input comes from.]

  To report the direct materials at CGL stage in Exhibit G-3, CSVC takes the [redacted] [method of allocating raw material cost to each coil].

  Here is a step-by-step demonstration:

  (1) Given to the specific nine-characteristic cost of production for reporting purposes, [redacted] [first step of the method].

  (2) Trace the [redacted] [the input material traced] *to produce each GI coil. CSVC* [redacted] [how CSVC traces that input to each finished coil].

  (3) The [redacted] [how the unit purchase price is used to calculate a conversion rate].

  (4) Take the output weight of each GI coil to [redacted] [the allocation base]. *That is, CSVC takes* [redacted] [the material cost used as the allocation basis and how model costs are derived from it].

  The costs due to [redacted] [how work in progress costs are treated].

- [redacted] [name of the second material]

  CSVC has calculated the material cost (Zinc) for response purposes as follows: (1) a [redacted] [the steps CSVC follows to calculate zinc cost by model and by quarter].

- [redacted] [sub-heading]

  [redacted] [how zinc cost is allocated to each coil using standard consumption keys set by coating weight and thickness, with an example, and which by-products are treated as recoveries and how they are allocated].

  Direct Labour and overhead

  Director Labour cost is calculated and allocated by [redacted] [allocation basis]. *As discussed in the first point above, CSVC firstly* [redacted] [how the allocation base is built from coil data].

  Factory overhead, maintenance, utility charge, tools and service fee are [redacted] [the allocation method used].

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.

   ANS.

   Please refer to Exhibit G-6.2 for the Selected MCC Cost Illustration. For zinc, recoveries, direct labour and overheads, CSVC randomly specifies monthly production of [redacted] [the period selected and the supporting report provided].

G-7 Major raw material costs

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

   ANS.

   The major raw materials are [redacted] [name of the main steel input] *and zinc ingot. As explained in G-6.1,* [redacted] [the main material consumed to make it].

2. Are any raw materials sourced as part of an integrated production process or from a subsidiary company 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.

ANS.

The raw material of GI production, [redacted] [how that input is produced].

The output of PLTCM [redacted] [how the PLTCM output is used]. *Please see Exhibit G-7.2 Raw material CTM for* [redacted] [description of that product].

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.

   ANS.

   Please see Exhibit G-7.3 for the ratio of hot-rolled steel and zinc representing in the goods with the calculation worksheet.

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.

   ANS.

   Please see Exhibit G-7.4 for purchase listing of hot-rolled coils.

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

   ANS.

   The source data for G-7.4 Raw material purchases (HR) is [redacted] [names of the internal systems and reports used as source data].

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.

   ANS.

Please see Exhibit G-7.6.a for the sample documents for two largest invoices by value for hot-rolled steel and zinc ingots respectively, and Exhibit G-7.6.b for the purchase reconciliation.

7. Are any of the suppliers in "G-7.4 Raw material purchases" listing related to your company? If yes, please provide details on how the price is set.

   ANS.

   As stated in above reply to G-1.2, [redacted] [names of the related suppliers] *supplying hot-rolled steel to CSVC. As for price setting, during the POR, the prices of HRC/HRB sold to CSVC is based on market price.*

G-8 Reconciliation of cost to make to audited financial statements

1. Please complete the worksheet named "G-8 Upwards costs" to demonstrate that the cost listings in G-3 and G-5 are complete.

   - You must provide this list in electronic format using the template provided.
   - Please use the currency that your accounts are kept in.
   - If you have used formulas to complete this worksheet, these formulas must be retained.

   ANS.

   Provided in Exhibit G-8 as instructed.

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 under consideration and other costs (e.g. non-goods or tolling services)
     - Domestic, Australian and third country goods under consideration
   - 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.

   ANS.

   Provided in Exhibit G-8 as instructed.

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.

   ANS.

   Provided in Exhibit G-8 as instructed.

G-9 Production of the goods under consideration

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.

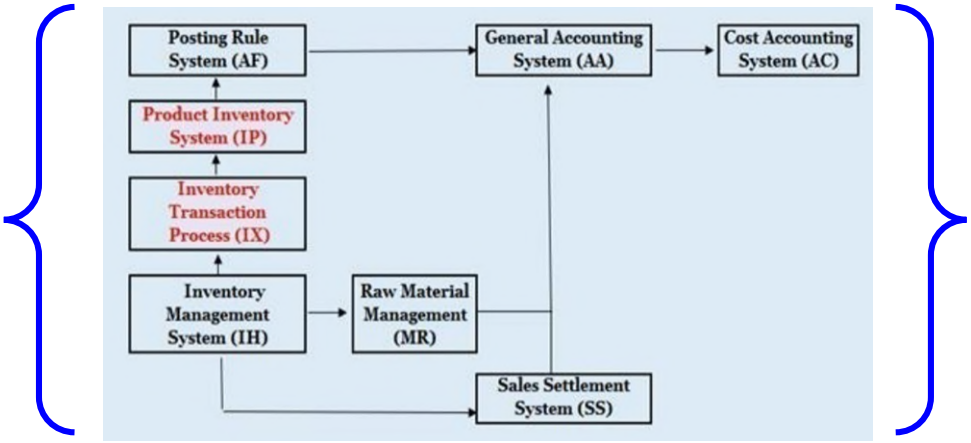
   ANS.

   CSVC uses a computerized Enterprise Resource Planning ("ERP") system to track its production. As with any ERP system, a variety of reports can be generated from CSVC's system as needed. [redacted] [number of reports] *reports entitled with* [redacted] [names of the reports] *are most commonly used by CSVC's cost accounting teams.* [redacted] [what each report records].

   The aforesaid reports are summarised from CSVC's cost databases. The production quantity is [redacted] [basis on which production quantity is sorted]. *For the production quantity of each coil, or the quantity of each MCC model, it can be pulled out from the ERP databases. To report Exhibit G-3 CTM, CSVC* [redacted] [the query and data steps used to prepare Exhibit G-3, including the cost centre and data table used].

   The flowchart illustrating how the production quantities are entered into the accounting system is provided as follows.

   Chart G-9.1 (sensitive)



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.

   ANS.

   Please refer to the response to G-9.1 above.

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”.

ANS.

The production quantity and sales quantity are reconciled in Exhibit G-3.

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?

ANS.

The production volume and product mix of production are mainly based [redacted] [the factors on which production volume and mix are based]. *The certain production condition means that, for example, CSVC needs* [redacted] [an example of a production constraint, with the volume involved].

The production volume and product mix are [redacted] [how often production volume and mix are reviewed and set].

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

ANS.

CSVC generally needs [redacted] [range of days] *days to adjust volumes of production.*

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.

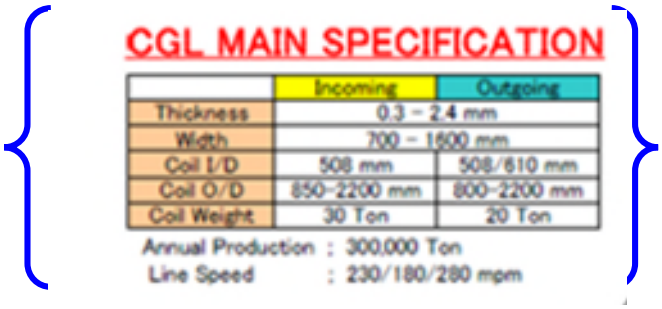
ANS.

Provided in Exhibit G-10.1 as instructed.

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

ANS.

The capacity utilisation is computed by actual output of prime and non-prime like products divided by nominal production capacity on yearly basis. The fully nominal production capacity of CGL production line reported in Exhibit G-1.1 is in accordance with the product group and speed set by the specification shown as below.



CGL MAIN SPECIFICATION

	Incoming	Outgoing
Thickness	0.3 ~ 2.4 mm	
Width	700 ~ 1600 mm	
Coil I/D	508 mm	508/610 mm
Coil O/D	850~2200 mm	800~2200 mm
Coil Weight	30 Ton	20 Ton

Annual Production : 300,000 Ton
Line Speed : 230/180/280 mpm

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)?

   ANS.

   Yes, CSVC has a warehousing facility [redacted] [the stage of production the warehouse serves]. *The estimated capacity is* [redacted] [warehouse capacity] *Metric tons.*

   During the POR, the quantity of inventory is around [redacted] [inventory quantity] *metric tons.*

   The inventory turnover day is [redacted] [number of days] *days. The formula is as follows:*

   *Average Inventory Turnover = (Beginning Inventory Volume + Ending Inventory Volume) / 2 / Total Shipment Volume * 365*

   The detailed calculation is provided in Exhibit G-10.3.

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.

   ANS.

   No. Over last five years, no such change to the type of capital or technology utilised in the manufacturing of the goods.

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.

   ANS.

   CSVC has a single production facility of the goods in Vietnam. There are four production lines (PLTCM, CAL, CGL and ACL) in the only one manufacture site that is owned by CSVC. The goods are produced in CGL production line.

   Construction on CSVC's production facility began in September 2011. CSVC began the production of the goods at its facility on [redacted] [date production began]. *However,* [redacted] [when commercial production began].

   The production capacity, as responded in G-10.2 above, is based on an actual production capacity and remains unchanged over the past five years.

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.

   ANS.

   Not applicable to CSVC. There is no such investment to updates, refurbish or build the plant used in the production of the goods.

SECTION J
DOMESTIC MARKET

J-1 Prevailing conditions of competition in the domestic market

1. Describe the domestic market for the goods and the prevailing conditions of competition within the market, including:

   (a) Provide an overall description of the domestic market which explains its main characteristics and trends over the past five years

   (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).

   ANS.

   According to the latest report from the Vietnam Steel Association ("VSA"), the Vietnamese steel market has demonstrated overall growth and strong recovery over the past five years (2020–2025). Driven by robust macroeconomic fundamentals—including Vietnam's Gross Domestic Product ("GDP") growth rate reaching 8.02% in 2025, with the industrial and construction sectors expanding by 8.62%, an Index of Industrial Production ("IIP") increase of 9.2%, and disbursed Foreign Direct Investment ("FDI") reaching US$ 27.62 billion (+9.0%)—domestic steel production and demand have expanded significantly.

   Vietnam's steel-consuming industries are primarily driven by the construction and public infrastructure sectors, which account for the vast majority of total domestic steel demand. The total production value of Vietnam's construction industry expanded significantly from 694,311 billion VND in 2020 to an estimated 995,527 billion VND in 2025, covering residential construction, non-residential buildings, civil engineering, and public infrastructure projects. Overall, the construction sector and its associated steel service center distribution networks generate an estimated 70% to 75% of total domestic steel sales revenue. Other key sources of

demand include mechanical manufacturing and metal fabrication (representing approximately 15% to 20%), as well as home appliances, automotive manufacturing, electrical equipment, and shipbuilding (collectively representing approximately 5% to 10%). (Source: https://asemconnectvietnam.gov.vn/default.aspx?ZID1=8&ID1=2&ID8=145722)

Domestic steel consumption variability is governed by several macroeconomic, seasonal, and regulatory factors. Construction activity exhibits pronounced seasonal fluctuations, slowing down during the monsoon season in the third quarter (particularly in Central and Northern Vietnam) and reaching peak activity from the fourth quarter through early first quarter ahead of the Lunar New Year holiday. Beyond seasonal weather patterns, steel demand is directly correlated with GDP growth, state public investment disbursements, and real estate development activity. Price fluctuations in global raw material inputs—most notably Hot-Rolled Steel Coils ("HRC")—and energy costs directly influence domestic steel pricing and client purchasing behavior.

Furthermore, government trade policy plays a vital role in market dynamics; the Vietnamese Ministry of Industry and Trade has implemented trade defense measures, including anti-dumping duties on low-priced imported coated and cold-rolled steel products from countries such as China and South Korea, preserving a fair competitive environment for domestic producers. Technological developments and increasingly strict decarbonization mandates are also shifting market demand toward high-performance, eco-friendly steel products.

The domestic steel market exhibits distinct structural segmentation by product category and geographic region rather than isolated commercial boundaries. By product type, the market is divided into construction/long steel (rebar, wire rod, accounting for roughly 50% to 55% of market revenue), flat steel (HRC, CRC, galvanized/coated sheets, and electrical steel, accounting for roughly 30% to 35%), and steel pipes and specialty/alloy steel (accounting for roughly 10% to 15%). Geographically, the market is divided between Northern Vietnam (centered around Hanoi and Haiphong for public infrastructure and industrial manufacturing) and Southern Vietnam (centered around Ho Chi Minh City and neighboring industrial hubs such as Dong Nai, Binh Duong, and Long An for coil processing, appliances, and general metal fabrication).

Domestically produced steel goods and imported like products share virtually identical end-use characteristics, technical specifications, and quality standards, making them highly substitutable in the open market. Domestically produced goods compete directly with imported products based on open market pricing, delivery lead times, product availability, and localized technical service. Trade remedy measures enforced by the Vietnamese authorities maintain market stability by curbing unfair competition from dumped or subsidized imports.

CSVC does not engage in consumer brand advertising or market goods through fixed price lists. All domestic sales prices are dictated by open market supply and demand forces, determined through [redacted] [the basis of price negotiation] *and market conditions. Distribution in the domestic market is conducted primarily through established* [redacted]

[redacted] [the main domestic distribution channels], *as detailed in Exhibit D-1.1.b. Other relevant influences on the domestic market include compliance with rigorous international product standards (such as JIS, ASTM, EN, and AS/NZS) and the industry-wide transition toward green manufacturing and carbon reduction.*

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.

ANS.

A table of the level of trade, distribution channel and the category of the customer which is maintained in CSVC's sales system is provided as follows:

Trade level	*CUSTGID*
[redacted]	[redacted] [CSVC's domestic customer categories and internal codes]

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.

ANS.

The major CG manufacturers include Hoa Sen croup (HSG), Nam Kim Steel (NKG) and TonDongA (GDA), Tay Nam Steel, Dai Thien Loc and Hoa Phat Group (HPG). HSG take major position in the CG industry of Vietnam, accounting for approximately 21–29% market shares.

Hoa Sen, Nam Kim and TonDongA are horizontal integration Mills.

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.

ANS.

During the POR, imports of galvanised (zinc-coated) flat-rolled steel into Vietnam came mainly from China, followed by Japan, Korea, Australia and Taiwan. Imports were fragmented across more than

250 importers. The more significant ones include Newtimes, Kim Quang, Son Vinh Khang and Khoi Nguyen (traders), POSCO VHPC, Hanwa SMC and Hanoi Steel Center (steel service centres), Ton Viet and Dong Nai Ton (roofing processors), and VinFast and AVC (end users).

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.

   ANS.

   Vietnam's Ministry of Trade imposed anti-dumping duties for galvanized sheet products from China, Hong Kong, and Korea. CSVC is not aware of any other competition policy, taxation and product standards that interfere with or restrict on the goods.

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

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

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

   ANS.

   Vietnam's Ministry of Trade imposed anti-dumping duties for galvanized sheet products from China, Hong Kong, and Korea. CSVC is not aware of any restrictions for new participants into the domestic market for the goods.

J-2 Goods in the domestic market

1. Generally describe the range of goods offered for sale in the domestic market. The description should include all like goods, including those produced by your company. Your description could include information about:

   - quality differences
   - price differences
   - supply/availability differences
   - technical support differences
   - the prevalence of private labels/customer brands
   - the prevalence of generic or plain labels
   - the prevalence of premium labels and
   - product segmentation.

   ANS.

Please refer to pages 7 through 21 of Exhibit A-2.11 for the product catalogue along with technical specifications of the like good, and see the sample test certificates provided in Exhibit D-3.1 for further technical details.

There is no difference in physical characteristics as well as in general usages & applications between the goods in domestic market and in foreign market.

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

   ANS.

   The usage application of galvanized steel includes construction materials, automobile parts, partition, fridge back frame, computer cases, ventilation ducts, air conditioner back panels, toles, pipes, drum rims, furniture, doors, slide rails and so on. Galvanized steel can be used as a based material for pre-painted steel sheet ("PPGI") as well. Depending on different requirements of customers for quality, the physical properties, grades and applications of galvanized products may classify typically as shown on products brochure provided in Exhibit A-2.11.

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.

   ANS.

   Generally, customer's usage preference is the key to make such decision. However, if there is no specific preference, price would be the main attribution factor. Followed by price, lead time is the other one factor. A constant supply of qualified and stable feed stock is crucial and indispensable in Vietnam too in particular during the period of time with a strong demand from construction industry.

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

   ANS.

   Most of Galvanised steel in the domestic market is substitutable/ interchangeable for the same goods produced by other mills. However, specific applications e.g. automotive consume Galvanneal steel (GA) only. CSVC is the only Vietnam steel manufacturer of GA.

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.

   ANS.

   Between 2021 and 2025, Vietnam's galvanised-steel market changed a bit: demand shifted from a construction-led slowdown toward recovery in 2024–25, and producers moved toward higher-value coated products.

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.

ANS.

As responded to J-1.1, CSVC will all highly focus on the domestic market rather than exports due to a strong demand in domestic market.

During POR, the sales revenue of the goods in the domestic market accounted for around [redacted] [share of total sales revenue]. *Please refer to* [redacted] [exhibit reference].

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.

ANS.

No. CSVC is not a price leader for the goods in the domestic market. As responded in J-1.3, the major CG manufacturers with two third market shares are Hoa Sen, Nam Kim and TonDongA.

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.

ANS.

Please refer the response to J-3.4 and J-3.13. CSVC's product pricing is to base on several strategies and factor including materials purchased, production cost and market forces.

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.

ANS.

All the prices of the sales in the domestic market are determined by the force of supply and demand in the open market, through negotiation of net prices which also reflect material costs.
[Confidential text removed: description of CSVC's internal price list, how often it is issued, whether it differs by customer, the factors it reflects, how it is set, and that sales staff may negotiate away from it.] [redacted] [title of the document] *is provided in* [redacted] [exhibit reference].

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.

ANS.

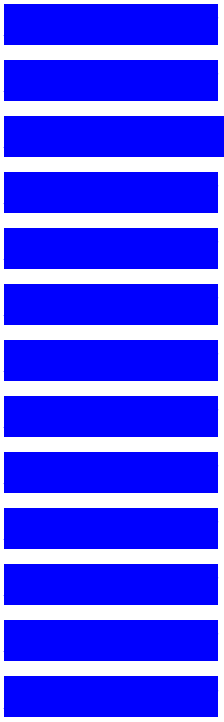
See response to J-3.4 above. [redacted] [how often the price guideline is reviewed].

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]

ANS.

The factors are ranked as follows:



[the pricing factors CSVC takes into account]

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?

   ANS.

   The selling price should not be lower than the cost according to the internal policy. Profit would depend on market conditions.

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.

   ANS.

   No. CSVC [redacted] [whether commission, rebates or discounts are offered on domestic sales, and whether any warranty claims or returns arose].

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.

   ANS.

   No. the bundle pricing is not applicable to CSVC.

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.

    ANS.

    No. CSVC does not offer quantity rebate.

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.

    ANS.

    CSVC uses sales contract in domestic market. All of domestic sales during POR came from contracted sales that were not made exclusively. Please refer to the [column [5] in Exhibit D-2].

[Confidential text removed: how contracts are formed, and whether prices are renegotiated or reviewed during a contract.] *The domestic customers under contract during the POR is listed in [Exhibit D-2]. As for the two largest domestic invoices in terms of sales revenue, please refer to [Exhibit D-3.1.* [Confidential text removed: invoice numbers and contract numbers of the two invoices.]

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.

    ANS.

    Please refer to the response to J-3.4.

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.

    ANS.

    Market forces, the costs of materials purchased and production are the primary methods to price products/models of the goods in the domestic market.

    As mentioned in the response to J-3.4, different base steels, various specification and dimension differences would differentiate pricing. [how the price guideline is used by sales staff in negotiation]

    A copy of the internal proposal for [the document provided and the exhibit containing it]*.*

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.

    ANS.

    No. CSVC does not differentiate prices for the good between customer segments. There are market forces, the costs of materials purchased and production (i.e. different base steels, various specification and dimension differences) for CSVC to be considered.

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.

    ANS.

[redacted] [whether CSVC sold to related customers, which ones, and whether prices differed from sales to unrelated customers]

In accordance with [Exhibit D-2], the sales revenues generated by [redacted] [share of domestic sales revenue made to a related customer].

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.).

   ANS.

   CSVC's sales are drived by its superior and stable quality, reliability and availability of 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.

   ANS.

   No. CSVC does not conduct brand segmentation.

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.

   ANS.

   The question is not applicable to CSVC. CSVC did not use advertising or other promotion campaigns for the goods.

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.

   ANS.

   There are around [redacted] [number of sales staff] *in the sales teams. They are ruminated based on employment contract and company regulations/policies. Specific pay-for-performance programs are not applicable.*

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.

   ANS.

   Please refer the response to J-3.4, along with its Exhibit.

SECTION K
AUSTRALIAN MARKET

Note:

The Section K involving question K-1 to K-3 is not applicable to CSVC given to the fact that CSVC had limited export sales of the goods [redacted] [approximate export volume] *MT to Australia during the review period.*

Please note that CSVC does not differentiate its product catalogue for different markets. The parts, materials, specifications, standards and manufacturing process applied to the galvanised steel manufactured by CSVC has no difference too for Vietnamese market and/or other markets.

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).

   ANS.

   The volume of CSVC's exports to Australia is relatively small. Accordingly, we do not have sufficient information to provide a reliable assessment or estimates of the overall Australian market, including its characteristics, sources of demand, market segmentation and prevailing conditions of competition. CSVC is therefore unable to provide detailed responses or supporting documentary evidence in relation to the matters raised in this question.

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.

   ANS.

   Please refer the response to K-1.1.

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.

   ANS.

   Please refer the response to K-1.1.

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.

   ANS.

   Please refer the response to K-1.1

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.

   ANS.

   Please refer the response to K-1.1

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.

   ANS.

   Please refer the response to K-1.1

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 under consideration 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.

   ANS.

   Please refer to pages 7 through 21 of Exhibit A-2.11 for the product catalogue along with technical specifications of the like good, and see the sample test certificates provided in Exhibit B-3.1 for further technical details.

   There is no difference in physical characteristics as well as in general usages & applications between the goods in domestic market and in foreign market.

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

   ANS.

   CSVC's goods to Australia were GA mainly. The galvanneal steel is commonly used in automotive body panels and other components that require painting, stamping, and welding and so on. Depending on different requirements of customers for quality, the physical properties, grades and applications of galvanneal products may classify typically as shown on products brochure provided in Exhibit A-2.11.

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.

   ANS.

   Please refer the response to K-1.1. A constant supply of qualified and stable feed stock would be crucial and indispensable for Australia customers.

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

   ANS.

   Please refer the response to K-1.1

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

   ANS.

Please refer the response to K-1.1

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.

   ANS.

   Please refer the response to K-1.1

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.

   ANS.

   As responded to J-1.1, CSVC will all highly focus on the domestic market rather than exports due to a strong demand in domestic market.

   During POR, the sales revenue of the goods in the domestic market accounted less than [redacted] [share of total sales revenue]. *Please refer to Exhibit B-4.*

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.

   ANS.

   No. CSVC is short of such information.

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.

   ANS.

   CSVC [redacted] [whether CSVC issued a price list for the Australian market]. *CSVC's product pricing is to base on several strategies and factor including materials purchased, production cost and market forces.*

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.

   ANS.

   All the prices of the sales in the domestic market are determined by the force of supply and demand in the open market, through negotiation of net prices which also reflect material costs.

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.

   ANS.

   The question is not applicable since CSVC [redacted] [whether CSVC issued a price list for the Australian market].

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]

   ANS.

   The factors on CSVC's pricing decisions in Australian market has no difference with that in domestic market.

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.

   ANS.

   The selling price should not be lower than the cost according to the internal policy. Profit would depend on market conditions.

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.

   ANS.

CSVC [redacted] [whether CSVC paid commission on Australian sales, to whom and for what service]*. Please refer the response to E-4.1.*

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.

   ANS.

   No. CSVC do not offer bundled pricing in the Australian market.

10. Does the volume of sales to a customer or the size of an order influence the selling price? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume based prices for the goods. Provide copies of internal documents which support your claims in response to this question.

    ANS.

    No. CSVC does not offer quantity rebate.

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.

    ANS.

    CSVC uses sales contract in domestic market. All of Australia export sales during POR came from contracted sales that were not made exclusively. Please refer to the [column [5] in ExhibitBD-2].

    [Confidential text removed: how contracts are formed, and whether prices are renegotiated or reviewed during a contract.] *The Australia customers under contract during the POR is listed in [Exhibit B-2]. As for the two largest domestic invoices in terms of sales revenue, please refer to [Exhibit D-3.1.* [Confidential text removed: invoice numbers and contract numbers of the two invoices.]

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.

    ANS.

    CSVC [redacted] [whether CSVC issued a price list for the Australian market].

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.

    ANS.

    Market forces, the costs of materials purchased and production are the primary methods to price products/models of the goods in the domestic market.

    As mentioned in the response to J-3.4, different base steels, various specification and dimension differences would differentiate pricing. [redacted] [how the price guideline is used by sales staff in negotiation]

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.

    ANS.

    No. CSVC does not differentiate prices for the good between customer segments. There are market forces, the costs of materials purchased and production (i.e. different base steels, various specification and dimension differences) for CSVC to be considered.

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.

    ANS.

    No, CSVC did not sell the goods to related entities in Australia.

K-4 Marketing and sales support in the Australian market

1. How does your company market the goods in the Australian market? Include in your response the value proposition used (e.g., competitive price, superior quality, reliability, availability, etc.).

    ANS.

CSVC's sales are driven by its superior and stable quality, reliability and availability 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.

   ANS.

   No. CSVC does not conduct brand segmentation.

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.

   ANS.

   The question is not applicable to CSVC. CSVC did not use advertising or other promotion campaigns for the goods.

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.

   ANS.

   There are around [redacted] [number of sales staff] *in the sales teams* [redacted] [whether domestic and export sales staff are separated]. *They are ruminated based on employment contract and company regulations/policies. Specific pay-for-performance programs are not applicable.*

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.

   ANS.

   Please refer the response to K-3.3.

CHINA STEEL AND NIPPON STEEL VIETNAM JOINT STOCK COMPANY

SOCIALIST REPUBLIC OF VIETNAM
Independence-Freedom-Happiness

No.: CSVC-C1-W20537-2026-330

Ho Chi Minh City, 24 September 2026

EXPORTER'S DECLARATION

I hereby declare that CHINA STEEL AND NIPPON STEEL VIETNAM JSC ("CSVC") have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this questionnaire is complete and correct to the best of my knowledge and belief.

Representative of the Requesting Party

China Steel And Nippon Steel Vietnam Joint Stock Company (CSVC)

M.S.D.N: 3501382588-Đ.T.N.N
CÔNG TY CỔ PHẦN CHINA STEEL & NIPPON STEEL VIỆT NAM

[redacted]

Vice President

[redacted]