



Exporter Anti-Dumping Questionnaire

Transition review of anti-dumping measures

Case TD0001: Certain welded tubes and pipes of iron or non-alloy steel originating in the Republic of Belarus, the People's Republic of China and the Russian Federation

Case reference number:	TD0001
Country concerned:	The Russian Federation
Period of Investigation (POI):	1 January 2019 to 31 December 2019
Injury period:	1 January 2016 to 31 December 2019
Deadline for response:	29 May 2020
Contact details:	Alex Uden, TD0001@traderemedies.gov.uk
Completed on behalf of:	PAO Severstal

When you have completed this form, indicate the **confidentiality** of this document by placing an X in the relevant box below:

- Confidential
 Non-confidential – will be made publicly available

Your completed response must comprise of this questionnaire document and the corresponding annexes. Please note that you will have to provide **two copies of your response**. Both, the questionnaire document and the annexes, must be provided in a **Confidential** and a **Non-Confidential version**. All four files should be returned to TRID using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **27 April 2020**.



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S1.2 – About your business	Ошибка! Закладка не определена.
S1.3 – Accounting practices	Ошибка! Закладка не определена.
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Signature (Annex I)..... **Ошибка! Закладка не определена.**



The scope of this review

Goods subject to review

This review covers **welded tubes and pipes** of

- iron or non-alloy steel;
- circular cross-section; and
- an external diameter not exceeding 168.3 mm

excluding line pipe of a kind used for oil or gas pipelines, casing and tubing of a kind used in drilling for oil or gas, precision tubes and tubes and pipes with attached fittings suitable for conducting gases or liquids for use in civil aircraft originating in **the Republic of Belarus, the People's Republic of China, and the Russian Federation**, destined for consumption in the United Kingdom (UK).

These welded tubes and pipes are currently classifiable within the following commodity code(s):

- ex 7306 30 41 (TARIC code 7306 30 41 20)
- ex 7306 30 49 (TARIC code 7306 30 49 20)
- ex 7306 30 72 (TARIC code 7306 30 72 80)
- ex 7306 30 77 (TARIC code 7306 30 77 80)

These commodity codes are only given for information.

In this questionnaire, these goods will be referred to as **'the goods subject to review'**. Any reference to 'goods subject to review' in this questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.

Like goods

In addition to seeking information about your company's export sales to the UK of the goods subject to review, this questionnaire will also ask about your sales of like goods in your domestic market and to third countries and like goods you import from third countries. Any reference to **'like goods'** in this questionnaire refers to goods which are **like** the goods subject to review in all respects, or with characteristics closely resembling them.

Please follow the instructions for each question to provide the appropriate information regarding the like goods or goods subject to review.



Product Control Numbers

TRID uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

PCNs, which come in the form of an **alphanumeric code**, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.

Characteristic	Field format	Explanation	Field length*
Outer finishing	Alphabetical	Indicate the outer finish of the product concerned G = Galvanized finish (zinc coated) B = Self colour ("black") O = Other (specify in the text box below)	1
Size (outside diameter)	Numerical	Indicate the outside diameter in mm e.g. 10.2 mm = 0102 88.9 mm = 0889 165.1 mm = 1651	4
End finishing	Alphabetical	Indicate the end finish of the product concerned P = Plain end B = Bevelled T = Threaded C = Threaded with couplings O = Other (specify in the text box below)	1
Wall thickness	Numerical	Indicate the wall thickness in mm e.g. 1.80 mm = 180 4.85 mm = 485	3

**The field length indicates the number of characters assigned to a characteristic within a PCN.*

In this questionnaire and the corresponding annexes, you will be asked to construct PCNs representing the different types of products you produce. When stating your PCNs, please do not use any spaces, dashes or other means of separation, and ensure you follow the order of characteristics outlined in the table above. Please use



this PCN structure consistently throughout your questionnaire response, including the corresponding spreadsheet annex.

Example of a Product Control Number:

A welded tube or pipe with a galvanised outer finishing (G), an outside diameter of 10.2 mm (0102), a plain end finishing (P) and a wall thickness of 1.80 mm (180) constitutes the following Product Control Number: **G0102P180**.

Please review the PCN structure shown in the table above and include any comments on the PCN structure in the box provided.

Product Control Numbers (PCNs) were created by applying the coding system given in Table above.

Please note that none of the “End Finish” features from the Table is applicable to Severstal’s merchandise. Severstal coded this feature as “O” for all products. The end finish is a cut of tube’s end at 90 degrees angle for all Severstal’s products under investigation.

As per additional guidance provided by Imogen Yapp in the email dated 23.04.2020, the wall thickness greater than 10mm was coded using the following pattern “1000” (e.g. thickness 12mm = 1200). The outer diameters with 2 digits after the dot were coded using math rounding (e.g. diameter of 26.75mm = 0268).



Instructions

Introduction

The Trade Remedies Investigations Directorate (TRID) of the UK's Department for International Trade will be carrying out a transition review of each trade remedy measure active under the EU system that the United Kingdom (UK) decides to transition after EU exit. This transition review will consider whether the anti-dumping measures for certain welded tubes and pipes of iron or non-alloy steel originating from the Republic of Belarus, the People's Republic of China, and the Russian Federation are necessary or sufficient to offset dumping and whether there would be injury to the UK industry if these measures no longer applied.

We are seeking your cooperation as an overseas exporter of certain welded tubes and pipes of iron or non-alloy steel exported from The Russian Federation to inform our review of whether the current anti-dumping measures should be maintained, varied or discontinued.

If you are an exporter of the goods subject to review to the UK but do not produce these goods, please complete Annex I, as well as sections of the questionnaire you are reasonably able to answer.

Please provide the Case Team with contact details for the company/companies that produce the goods subject to review that you export.

Please submit all the information requested by **27 April 2020**. If you are unable to complete the questionnaire within the required time, please contact the Case Team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension required and the reasons why. We will notify you of our decision. If we are able to accommodate an extension a note to explain this will be placed on the public file.

We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary.

Each time you provide confidential information in the confidential version of your questionnaire response, please provide a corresponding non-confidential summary (or a statement of reasons why you cannot provide this) in the non-confidential version of your questionnaire. If you do not submit a corresponding non-confidential summary or a statement of reasons where applicable, we may disregard the information you give us. The following section provides further information on what you need to do.

Please provide the source for all information or data not owned by yourselves and clearly state any restrictions on sharing it.



If you do not complete this questionnaire, you could be found to be non-cooperative. For more details on how this may affect you, please consult our operational guidance on non-cooperation: <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#non-cooperation>

Please contact the Case Team if you have any questions about your response or if you have any difficulties in completing the questionnaire. For general information about trade remedies processes, please visit the following website: <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process>

Please use the case reference number on the cover page for all correspondence with TRID.

TRID investigates cases under the provisions of *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 as Amended by the Trade Remedies (Amendment) (EU Exit) Regulations 2019* and under the *Taxation (Cross-border Trade) Act 2018*.

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annexes by the due date. **Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.** It is your responsibility to ensure that the non-confidential version does not contain any confidential information.

Please see <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#handling-confidential-information> for further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

All information provided to TRID in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019*) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/cases.

Providing information from subsidiaries or associated parties

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our investigation covers all subsidiaries and any other associated companies involved in the



production, export, sale, R&D, distribution and/or supply of the goods subject to review and/or like goods.

Please note, both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

If any of your subsidiaries or associated companies is also an exporting producer of the goods subject to review in country concerned, they should complete a separate questionnaire.

Where your subsidiaries or associated companies are not producers but are involved in the sales and/or distribution of the goods subject to review, they should complete Annex I as well as sections of the questionnaire they are reasonably able to answer.

Where your subsidiaries or associated parties are producers but are not involved in the sales and/or marketing of the exported goods subject to review to the UK, they are advised to contact the Case Team as soon as possible.

If you have any queries about this part of the process, please contact the Case Team using the details provided on the cover of this questionnaire.

What happens next

Once you have completed your questionnaire response including the corresponding annex(es) and you have prepared confidential and non-confidential versions of these documents, you must upload these through our Trade Remedies Service at www.trade-remedies.service.gov.uk. Following this:

- you will receive an email confirming the documents have been uploaded successfully;
- the Case Team will contact you if further information is required;
- the non-confidential responses will be placed on the public file; and
- the Case Team may contact you to arrange a visit to verify the information contained in your responses.

Verifying the information you supply

TRID will verify, as far as possible, the information provided to it. As part of our verification process, we may conduct verification visits. Visits can last several days, during which we will want to speak to management and staff to help establish the completeness, relevance and accuracy of the information provided. Within your response to this questionnaire, please provide all formulas and steps used in your calculations.

To assist the verification of the information you provide, please ensure a record is kept of all material and documentation (including accounting and management records) used to support the completion of this questionnaire and the annex(es).



If we need to verify information that you provide by visiting your premises, the Case Team will contact you. Verification visits can take several days.

In the text box below please indicate any time periods in the next three to six months when you would be unable to host a verification visit.

For the time being Severstal can't provide such information due to Russia lockdown.

Appendix reference:

After the verification visit, TRID will prepare a report and share a draft with you. TRID will then ask you to prepare a non-confidential copy of the report for the public record and provide reasons for why any information should be kept confidential.



How to complete this questionnaire

Please read and follow all the instructions carefully. Your company is required to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses. To assist with verification please retain all such documents, your completed spreadsheet annexes and any calculations made when developing your responses.

Please also note the following points:

- Please refer to the case number, TD0001, for any correspondence with TRID.
- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why.
- If the answer to a question is “zero”, “no”, “none” or “not applicable”, please write this rather than leaving the answer blank.
- Please complete the spreadsheet annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you cannot present the information as requested, please contact your Case Team.
- If we ask for copies of additional documentation, please submit this information as appendices. Please ensure that these appendices are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English or Welsh should be accompanied by an English or Welsh translation.
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g. do not use kg and tonnes interchangeably).
- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- Please ensure that all numbers which represent costs are reported as positive figures (e.g. for costs of £1,300.00 please enter £1,300.00 and not - £1,300.00)
- Please limit all sales/currency/income figures to two decimal places and apply a full point as a decimal separator (decimal point). Use the appropriate currency symbol or abbreviation (e.g. £1,300.00, GBP 1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- For any exchange rate you may list in the annex(es), please submit an appendix proving the date and source for this rate.
- All figures should be reported net of tax unless otherwise stated.



SECTION A: Company structure and operations

A1 Identity and contact details

1. Please complete the table below, ensuring that the point of contact given has the authority to provide this information:

Legal name of company:	PAO "Severstal"
Legal structure	Public Joint Stock Company
Year of establishment:	1955
Other operating names:	Severstal
Company registration number (if applicable):	1023501236901
Place of registration (if applicable):	City Hall of Cherepovets
Name (point of contact):	Mr. []
Position:	Head of Trade policy department
Address:	30 Mira str., Cherepovets, Vologda reg., Russia, 162608
Telephone No:	+7 (8202) []
Email:	[]
Website:	www.severstal.com

2. If you have appointed an external party to act on your behalf in this review, please provide their details and attach the letter of authority confirming TRID should contact them directly:

Name:	Not applicable
Address:	
Telephone No.:	
Email:	
Confirm they have signed authority to act (Yes/No):	
Appendix reference: not applicable	

A2 About your company

1. Please describe the role of your company in relation to exports of the goods subject to review to the UK market (e.g. producer, producer/exporter or exporter/distributor). If you are an exporter of the goods subject to review, but do



not produce these goods, please complete Annex I and other parts of this questionnaire you are reasonably able to answer.

PAO "Severstal" is a Russian producer and exporter of welded tubes and pipes.

Appendix reference: **not applicable**

2. Please provide details of any changes in the legal form of your business over the past five years, for example, mergers, acquisitions and/or sales.

There are no any changes in the legal form of PAO Severstal over the past five years.
The changes in the legal form since the original establishment of the company provide in the Table below.

Date	Legal form	Explanation of change
1955	State ownership	Start of Cherepovets Metallurgical Plant
1983	State ownership	Reorganize Cherepovets Metallurgical Plant into Cherepovets Steel Mill
1993	Open Joint Stock Company	Cherepovets Steel Mill was registered as Open Joint Stock Company under the name "Severstal"
2014	Public Joint Stock Company	Federal Law N 99-FZ

+Add additional rows as required.

3. List and explain all authorisations your company has been required to obtain to produce, sell, or export the goods subject to review or like goods. These may include licences, permits, permissions or mining concessions. Indicate if your company is subject to any direct or indirect, quantitative or other, restrictions on any of these activities.

Severstal operates in full compliance with applicable Russian law and is not subject to any quantitative restrictions.

Appendix reference: **not applicable**

4. State whether your company is a member of any representative organisations. (e.g. trade bodies/associations/Chamber of Commerce). If so, provide a copy of the relevant documentation.

Severstal is a member of Vologda Chamber of Commerce. Chamber of Commerce is a non-governmental and non-profit organization. It represents the interests of small, medium and large businesses and it encompasses all business sectors - industry, domestic and foreign trade, agriculture, financial system services. Severstal's membership number is 233-49. The confirmation of membership you



can find on official web-site of Vologda Chamber of Commerce:
<http://vologda.tpprf.ru/ru/chleny/>

Severstal is a member of Russian Union of Industrialists and Entrepreneurs (RSPP). RSPP is non-political organization which protects the interests of industry at the time of fast and large-scale transformations in the state politics and economy. RSPP priorities include: promotion of the business community interests in Russian and at the international level and consolidation of Russian industrialists and entrepreneurs` efforts for business environment development; enhancing the status of business in Russia and the world; maintaining the balance of interests of society, government and business.

Information about RSPP members you can find on official web-site of Russian Union of Industrialists and Entrepreneurs: <http://old.rspp.ru/simplepage/172>. Registration number of PAO Severstal is 408.08.35, dd. 09.09.2011. and in English <http://en.rspp.ru/about/inform/>

Since June 30, 2009 Severstal is a member of Non-profit Partnership "Russian Steel". Non-profit partnership "Russian Steel" was created in 2001 by leading Russian metallurgical companies to coordinate efforts to protect the interests of Russian metallurgists and implementation of joint projects of a non-commercial nature.

"Russian Steel" brings together the largest manufacturers of steel products in Russia. The confirmation of membership you can find on official web-site of Russian Steel: <http://eng.russtal.ru/members/>

Since 2001 year Severstal is a member of World Steel Association. Worldsteel is a non-profit organization and one of the largest and most dynamic industry associations in the world. Worldsteel represents approximately 170 steel producers (including 9 of the world's 10 largest steel companies), national and regional steel industry associations, and steel research institutes. Worldsteel members represent around 85% of world steel production.

The confirmation of membership you can find on official web-site of World Steel Association: <https://www.worldsteel.org/about-us/worldsteel-membership/worldsteel-members/regular-members.html>

Appendix reference: **not applicable**

5. If applicable to your company, please attach the latest copy of the following documents (in the original language and in English):

- articles of association and all related documents;
- business licence;
- proof of registration of the company with the competent authorities;

Please describe what you are submitting and provide appendix references for your attachments in the box below. Earlier copies from the date of establishment of the company until the present should be available upon request during any verification visit.



Articles of Association (the Charter of PAO Severstal) are attached as Annex A1. There are no Business Licences and yearly evaluation of the business licence of the company issued by the relevant Authority applicable to the company. Proof of registration of the company with the competent Authorities is attached as Annex A2.

Appendix reference: **Annex A1, Annex 2**

A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) or legal persons (e.g. companies) are associated where they meet the definition of 'related persons' in [Regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

1. Please demonstrate in a diagram and explain, the legal structure of your company showing the internal hierarchical and organisational, all sites/locations and departments which are involved in the production, sale, R&D, supply and distribution of the like goods or goods subject to review. Clearly indicate the different production stages carried out by your company.

First steel was produced in August 24, 1955. This day was the birthday of the Cherepovets Metallurgical Plant.

Taking into consideration the complex structure and integrated nature of production, on June 23, 1983, the Ministry of Ferrous Metallurgy of the USSR resolved to reorganize Cherepovets Metallurgical Plant into Cherepovets Steel Mill. On September 24, 1993, pursuant to a Decree of the President of the Russian Federation, State Enterprise Cherepovets Steel Mill was registered by the Mayor's Office of the City of Cherepovets as Joint Stock Company "Severstal".

According the general meeting of shareholders on November 14, 2014, the name of the company was brought into compliance with the Russian Federal Law N 99-FZ and changed to Public Joint Stock Company under the name PAO Severstal effective from December 1, 2014.

PAO Severstal is a private Russian company controlled by its private shareholders. There is no State interference in Severstal's activities whatsoever.

Severstal is an integrated steelworks of full production cycle integrating more than 100 major process units, from iron ores and coals processing to finishing operations where high-value products are produced.

Severstal has some units, which involved in the production of subject merchandise during investigation period.

[names of legal entities, description of their activities]

The internal hierarchical and organizational structure of CherMK (PAO Severstal) which indicates main sites and departments which are involved in the production, sale, R&D and sales of the like goods or goods subject to review is attach as Annex A3.

[description of Annex 3]



You can find more information about our company on Internet at <http://www.severstal.com>.

[detailed information about legal entities and their activities]

Appendix reference: **Annex A3**

2. Please complete **Section A – Company structure and operations**, subsection **A3 – Organisational structure of Annex II**.

- Include your company’s worldwide corporate structure and affiliations, including parent companies, subsidiaries and/or other associated companies.
- If your company is the subsidiary of another company, please give the name of this company, as well as that of your company’s ultimate controlling entity, their registration number(s) and place(s) of registration.
- Please provide the name, email address and telephone number for an appropriate representative from each company identified.
- Please list the activities carried out by each company identified (e.g. manufacturing, administration, sales).
- Indicate any shareholdings you have in the associated company and the shareholdings that the associated company has in your company.

Severstal has two divisions:

- Severstal Russian Steel
- Severstal Resources

The chart of world-wide corporate structure of Severstal which shows the major associated companies is attached as Annex A4. Severstal has a large number of associated companies, which can’t be showed on the chart jointly.

[names of legal entities, description of their activities]

The structure and operations are shown in the table Annex II (Sheet A3).

More detailed information about activities of these companies can be found at Severstal’s official web-site <http://www.severstal.com>.

Appendix reference: **Annex A4, Annex II**

A4 Board members and principal shareholders

1. Please complete **Section A – Company structure and operations**, subsection **A4 – Owners and shareholders of Annex II**, providing a list of all your company’s shareholders that owned more than 5 % of its shares during the POI.

Where known, provide details of their activities. Also include:

- the composition of the Board of Directors and shareholders, including their roles and rights;



- your company's registered capital for the last five years.

Please provide this information for your company and for all its predecessor legal entities.

2. Explain your procedure for appointing the members of the Board of Directors.

Severstal is a Public Joint Stock Company. It is publicly-owned, with a large number of shareholders (about [several] thousand), that are both natural and juridical persons. All shares of PAO Severstal are fully-paid. Currently private parties hold 100% of the company's shares. There is no State interference in Severstal's activities whatsoever.

The largest shareholders of Severstal who owned more than 5% of the shares as of 31st of December, 2019 are listed in Annex II (Sheet A4)

[information about shareholders and Board of Directors]

Information about all Board Members is listed in Annex II (Sheet 4).

Appendix reference: **Annex II**

A5 Operational links with other companies or persons

1. In the table below, please list any long-term agreements you held with any company/companies located in the UK, the Republic of Belarus, the People's Republic of China, the Russian Federation or third countries during the POI.

The list should contain all agreements, which relate to the production, trade, sale, R&D, supply and/or distribution of the like goods and/or goods subject to review or any services related to this; this could include:

- licencing agreements;
- technical patents;
- compensatory agreements;
- sub-contractor agreements; or
- tolling agreements.

Please provide:

- the name and address of the company with which you held these agreements;
- an explanation of the nature of the agreement;
- whether the company is associated to you; and
- a copy of the agreement.

Please note, we might use any contact details provided in this section to contact the relevant companies.



There are no any long-term agreements Severstal held with any company/companies located in the UK, the Republic of Belarus, the People's Republic of China, the Russian Federation or third countries during the POI.

Company name and address	Nature of agreement	Associated company (Y/N)?
not applicable		
	Appendix reference:	Not applicable

+Add additional rows as required.

A6 Accounting practices

1. Please give the address where your company's accounting records are kept. If records are maintained in different locations, please indicate which records are kept at which location.

Records address	What records are held?
Mira 30, Cherepovets, Vologda region, Russia	Accounting records of Severstal. The verification of all data provided above can take place at this address.

+Add additional rows as required

2. Please give the financial year convention your company uses for its accounts (e.g. 1 January – 31 December). If any changes have occurred with respect to this period or in your accounting practices over the last five financial years, please describe these changes with reference to any restatements in your financial accounts, including dates and reasons for them.

The principles and rules of organization and keeping of accounts at Severstal are regulated by "Regulations of Severstal accounting policy" attached as Annex A6.1. This Regulation provides detailed aspects of Severstal's accounting system with respect to production and sale processes.

Severstal have changed its accounting methods in accordance with the changes of legislation of the Russian Federation. However, such changes did not affected the main principles of Severstal's accounting system.

Appendix reference: Annex A6.1

3. Please describe your cost accounting system, including cost centres, standard costs, variances, setting of standards, etc.



According to the Russian legislation, a company's cost accounting system which accumulates costs for goods must be based on the actual production costs incurred. [description of Severstal's SAP ERP system and accounting process].
 General description of SAP system is provided as Annex A6.2. [description of Severstal's accounting system].
 A list of Basic differentiation cost elements are provided as Annex A6.3. [description of Severstal's accounting system].

A list of cost centers using for accounting of production cost is provided as Annex A6.4. [description of Severstal's accounting system].

PAO Severstal keeps records and maintains financial statements in accordance with the following requirements:

- Russian accounting standards (RAS);
- Requirements of Russian Tax Code;
- IFRS.

[description of Severstal's accounting system].

Appendix reference: Annex A6.2, Annex A6.3 and Annex A6.4

4. Explain any standard costs that have been provided in this questionnaire. Please state how frequently standard costs are revised and how are variances allocated.

Standard cost is calculated for each product code that [description of Severstal's accounting system].

Appendix reference: Not applicable

5. For your company and any associated parties involved in the production, sale, R&D, distribution and/or supply of your like goods and/or goods subject to review, please attach a copy of your audited accounts covering the injury period.

If these audited accounts do not cover the injury period, please submit additional accounts. This may include a statement of financial position; income statement and other comprehensive income; statement of changes in equity; cash flow statement; notes to the accounts and all reports; and the auditor's opinion on these documents.

The audited financial statements covering the injury period are attached as Annex A6.5. The audited financial statements of related companies involved in the



production, marketing or sales of the production under investigation for the last four years (2016, 2017, 2018 and 2019) are attached as Annex A6.6.
The consolidated financial statements of PAO Severstal and its subsidiaries with auditors' report are attached as Annex A6.7.

Appendix reference: Annex A6.5, Annex A6.6 and Annex A6.7

6. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the injury period.

Not applicable.

Appendix reference: Not applicable

7. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI and the most recent financial year.

Severstal's trial balance covering the POI and the most recent financial year is attached as Annex A6.8.

Appendix reference: Annex A6.8

8. For your company and any associated parties involved in the production and/or sale of the like goods or the goods subject to review, please attach copies of relevant management reports/accounts (e.g. profit and loss statement) for the profit centre(s) that includes these goods. Please provide these reports for the (i) POI and (ii) most recently completed financial year.

Severstal does not maintain such reports for the goods subject to review.

Appendix reference: Not applicable

9. If your company is part of a group of companies, please also attach a copy of the consolidated accounts of the group for the most recently completed financial year.

The consolidated financial statement of PAO Severstal and its subsidiaries with auditors' report for the most recently completed financial year is attached as Annex A6.7.

Appendix reference: Annex A6.7

10. Please provide a detailed description of your management information system and a brief description of your financial accounting system, and attach:
- your company's chart of accounts;



- a chart showing the main components of your management information system (i.e. the accounting system, costing system, payroll system, material management system, warehouse management system) and their links.

Russian Federation: Federal Law N 208 “On Joint Stock Companies” (dd. December 26, 1995), Federal Law N 402 “on Accountancy” (dated December 6, 2011) and other regulations and statutory acts on the accounting. These laws specify the following:

- Accounts should be kept in the Russian Federation;
- Accounts should be kept in Russian ruble;
- Accounting records have to be kept for at least five years; annual financial statements and audit reports, consolidated financial statements, articles of association, minutes of board meetings, have to be kept permanently.

Severstal’s chart of accounts is established in accordance with the Order N 94n of the Finance Secretary of the Russian Federation dated October 31, 2000. The order provides the chart of accounts for the organizations. It contains double-digit accounts along with the description. The first two digits of each Severstal’s account are assigned with the Order. Please see Annex A6.9a for a key. The last 6 digits relate to the subaccounts which could be specific for each organization. There are no strict groupings for subaccounts. Annex A6.9b represents the united chart of accounts for several companies within Severstal group which use SAP system for accounting. The description of SAP system is provided above.

Appendix reference: Annex A6.9a and Annex A6.9b

11. With reference to the chart provided in the question above, please provide the names of the system(s) you use for financial accounting, sales and production. If you use more than one system, please explain how the systems interact (including whether electronic or manual).

As it was mentioned above that Severstal uses SAP system for accounting, sales and production. General description of SAP system is provided as Annex A6.2.

Appendix reference: Annex A6.2

12. Describe your accounting methodology, where applicable, for:

- the recognition and/or timing of income and the impact of discounts and rebates, sales returns, warranty claims and intercompany transfers;
- the depreciation and amortisation methods, and the periods used by your company for each class of asset such as intellectual property, plants, buildings, machinery and equipment (including average useful life and the methods for calculating this);
- provisions for bad or doubtful debts;



- the accounting treatment of general expenses and the extent to which these are allocated to the cost of goods;
- the accounting treatment of finance costs and how these are allocated to the cost of goods;
- costing methods (for example, by tonnes, units, revenue, activity, direct costs, standard costing etc.) and allocation of costs shared with other goods or processes;
- your inventory valuation methods for raw material, work-in-process, and finished goods, for example First In First Out (FIFO) or weighted average cost;
- aging/obsolete inventories, your write-off and/or write-down process(es);
- valuation methods for scrap, by-products or joint products;
- valuation methods for damaged or sub-standard goods generated at the various stages of production;
- valuation and revaluation of fixed assets, and the subsequent treatment of excess depreciation/amortisation;
- treatment of any subsidies or grants;
- treatment of foreign exchange gains and losses arising from transactions and from the translation of balance sheet items;
- restructuring costs, costs of plant closure, expenses for equipment not in current use and/or plant shut-downs.

- the recognition and/or timing of income and the impact of discounts and rebates, sales returns, warranty claims and intercompany transfers;

Severstal does not practice any specific year-end accruals and adjustments.

- the depreciation and amortisation methods, and the periods used by your company for each class of asset such as intellectual property, plants, buildings, machinery and equipment (including average useful life and the methods for calculating this);

[description of Severstal's accounting system].

- provisions for bad or doubtful debts;

[description of Severstal's accounting system].

- the accounting treatment of general expenses and the extent to which these are allocated to the cost of goods;
- the accounting treatment of finance costs and how these are allocated to the cost of goods;

[description of Severstal's accounting system].



- costing methods (for example, by tonnes, units, revenue, activity, direct costs, standard costing etc.) and allocation of costs shared with other goods or processes;

[description of Severstal's accounting system].

- your inventory valuation methods for raw material, work-in-process, and finished goods, for example First In First Out (FIFO) or weighted average cost;

[description of Severstal's accounting system].

- aging/obsolete inventories, your write-off and/or write-down process(es);

[description of Severstal's accounting system].

- valuation methods for scrap, by-products or joint products;
- valuation methods for damaged or sub-standard goods generated at the various stages of production;

[description of Severstal's accounting system].

- valuation and revaluation of fixed assets, and the subsequent treatment of excess depreciation/amortisation;

The methods of valuation of fixed assets were provided above.

- treatment of any subsidies or grants;

Severstal does not receive any subsidies or grants.

- treatment of foreign exchange gains and losses arising from transactions and from the translation of balance sheet items;

[description of Severstal's accounting system].

- restructuring costs, costs of plant closure, expenses for equipment not in current use and/or plant shut-downs.

[description of Severstal's accounting system].

Appendix reference: Not applicable

13. If the accounting practices used by your company have changed over the last five years, please explain the changes, including dates and reasons for them.

As it as mentioned above, Severstal had changed its accounting practices in accordance with the changes of legislation of the Russian Federation. However, such changes had not affected the main principles of Severstal's accounting system.

Appendix reference: Not applicable

A7 Your company's products



Please complete **Section A – Company structure and operations**, subsection **A7.1 – Your company’s products, Annex II**.

1. For the goods subject to review, please describe your company’s Company Control Number (CCN) system. Please indicate how your own internal codes correspond to the PCNs provided in the table in the section above on [Product Control Numbers](#).

Severstal’s ERP system presents production and sales information by product accounting code. For internal accounting and sales purposes, all products are assigned an internal accounting code.

Generally, the product accounting codes are structured in the following manner:

Symbols	Description
[description of Severstal’s accounting codes].	

Appendix reference: Annex A7.1 - Your company's products

2. If your company does not use the same product codes across production, sales and invoicing, please expand the table in **A7.1 – Your company’s products** to further include the corresponding codes.

If an associated company produces and/or sells the like goods on your domestic market or produces and/or sells the goods subject to review, please also provide the same relevant details for the associated company/companies.

3. For each type of the like goods sold on your domestic market and the goods subject to review destined for consumption on the UK market, please provide a technical description as well as sales brochures, if available.

Please also provide information on:

- technical characteristics;
- physical characteristics; and
- any other important factors.

The pages from Severstal’s product catalogue covering the product under investigation are attached as [Annex A7.3 Pages from catalogue](#). Information about products can also be found in Severstal’s internet site <https://chemrk.severstal.com/upload/iblock/ab4/ab409c4f92a3a0646e8278e53a3a8717.pdf>

Appendix reference: Annex A7.3 Pages from catalogue



4. Describe all other goods produced and/or sold to the UK by your company, providing a name and description. If appropriate, please group them by type/range. Please complete **Section A – Company structure and operations, A7.2 – Other goods, Annex II.**

A8 Product similarity

1. Please complete **Section A – Company structure and operations, A8 – Product similarity, Annex II.** Thinking about the technical, physical and other relevant factors, are the goods subject to review and/or like goods that you produce and/or export different to the like goods made or sold by UK industry?

The required information is provided in Annex A8 - Product similarity.

As for technical characteristics of the UK merchandize, PAO Severstal does not have detailed unequivocal information about the UK products to provide it in the annex and make a reasonable comparison between them and PAO Severstal's products.

Appendix reference: Annex A8 - Product similarity



SECTION B: Sales

The following describes the type of data needed in this section of the questionnaire. Text in italics provides instructions and/or examples of what to include and how.

Column heading	Explanation
No.	Sequential numbers to list each transaction. Numerical input – Put '1' for the first transaction, '2' for the second transaction etc.
PCN	The PCN should correspond to the product sold in the listed transaction. See previous section, 'The scope of this review', for more details. Numerical & alphabetical input
CCN	Your internal company control number (CCN) for the product model you are selling.
Source	This refers to how the product on the invoice was obtained, either through your own production or through an associated/independent supplier. Categorical input – Put only one of the following: Own product; Associated supplier; Non-Associated supplier.
Customer name	The name of the customer as stated on the invoice. Alphabetical input - If the name of the customer is in a non-Roman/Latin script, such as Arabic, Chinese or Cyrillic, display an appropriate romanisation first and then the customer's name in the original script in brackets. For example: 'Gongsi Mingzi (公司名字)'.
Customer number	The unique number you have assigned to each of your customers. Numerical/alphabetical input
Customer link	Specify if your customer is associated with your company. Categorical input – Put only one of the following: Associated; Non-Associated.
Customer type	Specify what level of trade they are. Categorical input – Put only one of the following: Producer; Distributor; Wholesaler; Retailer; Others (please specify).
Invoice number	The number on the invoice. <i>Give the number as shown on the invoice.</i>



Column heading	Explanation
Transaction number	A number to identify an individual product transaction on an invoice. Multiple transactions of different products may be present on an individual invoice. Equally, one transaction may be split over several invoices. <i>Give the number as shown on the invoice or assign numbers by line item.</i>
Invoice date	<i>State the date on the invoice. Use the format DD/MM/YYYY (e.g. 23/05/2019).</i>
Purchase order date	<i>State the date the purchase order was raised. Use the format DD/MM/YYYY (e.g. 23/05/2019).</i>
Bill of lading no.	<i>Provide the number as stated on the bill of lading.</i>
Delivery terms	The terms of delivery given on the invoice, as expressed as an incoterm such as EXW, FCA, FOB, CIF and others. <i>Provide the delivery term as stated on the invoice.</i>
Payment terms	The number of days given for the customer to complete the purchase. Numerical input – <i>Indicate the number of days given (e.g. zero days is '0', thirty days is '30', sixty days is '60').</i>
Transaction quantity	The quantity of the goods per transaction as stated on the invoice. Numerical input
Transaction unit	The unit used to measure or show the quantity of the goods per transaction as stated on the invoice. <i>Provide the unit as stated on the invoice. Where appropriate, use an abbreviation (e.g. 'kg' for kilogram or 'l' for litre).</i>
Transaction quantity in Kilograms (kg)	The quantity of the goods per transaction in kg . Numerical input – <i>Input only as a number.</i>
Destination country	The final destination for the consumption of the goods subject to review and/or like goods.
Exporting country	The foreign country or territory an overseas exporter exports its goods from, or the foreign country or territory of origin of those goods where the goods are not exported directly to the UK from that foreign country/territory.
Gross invoice value	The invoice value inclusive of any taxes. Numerical input – <i>Keep all figures to two decimal places. Use a full stop as a decimal separator (e.g. 300.00). Do this for every appropriate, subsequent field. State the figure using the invoice currency.</i>



Column heading	Explanation
Taxes	The amount for each tax. Create a new column if there is more than one tax on the invoice (e.g. VAT, import tax). Label each tax with a clear and appropriate name such as 'Tax 1', 'Tax 2' and so on, and provide a legend. <i>State the figure using the invoice currency. Enter '0.00' if not applicable.</i>
Discounts	The amount for each discount. Create a new column if there is more than one discount on the invoice. Label each discount with a clear and appropriate name such as 'Discount 1', 'Discount 2' and so on, and provide a legend. <i>State the figure using the invoice currency. Enter '0.00' if not applicable.</i>
Rebates	The amount for each rebate. Create a new column if there is more than one rebate on the invoice. Label each rebate with a clear and appropriate name such as 'Rebate 1', 'Rebate 2' and so on, and provide a legend. <i>State the figure using the invoice currency. Enter '0.00' if not applicable.</i>
Other charges	The amount for each charge. Create a new column if there is more than one charge on the invoice. Label each charge with a clear and appropriate name such as 'Charge 1', 'Charge 2' and so on, and provide a legend. <i>State the figure using the invoice currency. Enter '0.00' if not applicable.</i>
Net invoice value in invoice currency	The cell has a formula, so no action required. If you create new columns, please check to see that the formula includes them.
Invoice currency	The currency used in the invoice. <i>Provide the official abbreviation of the invoice currency (e.g. USD – United States dollar; CNY – Chinese yuan; RUB – Russian ruble).</i>
Exchange rate	Provide the exchange rate from the value of one invoice currency to the accounting currency. The accounting currency is provided in Guidance, Annex II. <i>Show the exchange rate to four decimal places (e.g. 0.7575). Please provide an appendix proving the date and source for this rate.</i>
Net invoice value in accounting currency	The cell has a formula, so no action required. However, if new columns were created, check to see that the formula includes them.
CIF value in accounting currency	Provide CIF value for transaction. If transaction was not made at a CIF level, please provide an estimated value based on actual costs.



B1 Sales

1. Please complete **Section B – Sales**, subsection **B1 – Upwards sales reconciliation, Annex II** starting at the bottom of the table. Please only fill in white cells and update the formulae as required. If you use any additional formulae to complete the table, please include these. Insert additional columns or rows if needed. Please ensure that the table is completed using your accounting currency. Sales to third (intermediary) countries, where the ultimate destination is the UK, **must** be included in the data where applicable.
 - Sales revenue and quantity of like goods during the POI:
For the like goods, please state the sales revenue and quantity for sales on the domestic market and export sales to third countries during the POI, as reported in **Annex II, Section B – Sales, subsections B4 – Domestic sales and B6 – Sales to other countries.**
 - Sales revenue and quantity of goods subject to review during the POI:
For the goods subject to review, enter the sales revenue and quantity for export sales to the UK during the POI as reported in Annex II, Section B – Sales, subsection B3 – Sales to the UK.
 - Sales revenue and quantity of all goods during the POI:
If you produce goods other than the goods subject to review/like goods, please provide the sales revenue and quantity of each of these goods during the POI. Please note, that the headings (e.g. Sales revenue/quantity of good A during the POI, Sales revenue/quantity of good B during the POI, etc.) should be adapted to suit the names of your goods which are not the like goods.
 - Total sales revenue/quantity of all goods during the POI as stated in your management accounts:
Please provide the total sales revenue and total quantity of all your goods during the POI as shown on your management accounts.

If this figure does not reconcile with the totals of the sales revenue and quantity data you provided for the previous bullet points, the table will show a variance. Please use the text box below to provide an explanation for the difference.

The variance of [few] RUB indicated in the cell C17 of the Annex B1 - Upward sales can be explained by rounding. In the official documents values are shown in thousand RUB whereas values for the lines starting from “Total sales revenue/quantity of all goods sold during the POI” are taken directly from SAP ERP and are in RUB. The volumes are only provided for lines starting from “Total sales revenue/quantity of all goods sold during the POI” because “all goods” & “other goods” groups contain



sales of works, services and co- and by-products that are not measured in metric tonnes/kilograms (like oxygen, water, etc.).

Appendix reference: Annex B1 - Upward sales

- Difference in total sales revenue of all goods between the POI and accounting periods:
If the POI and your accounting period are different, please enter the difference between the total sales revenue of all goods during the POI and the total sales revenue of all goods during the accounting period.
- Total sales revenue of all goods as per Income Statement:
Please provide the total company sales revenue of all goods as shown on your audited Income Statement for the most recent financial year.

If this figure does not reconcile with the sum of the total sales revenue of all goods during the POI and the difference in sales revenue of all goods between the POI and the accounting period, the table will show a variance. Please use the text box below to provide an explanation for this difference.

The total company sales revenue of all goods as shown on the audited Income Statement for 2019 is reported as “Total sales revenue of all goods as per Income Statement” in the Annex B1 - Upward sales.

Appendix reference: Annex A6.5-d Audited Financial Statement 2019, Annex B1 - Upward sales

2. Please use the text box below to reference any source documentation for the data.

The source for “Total sales revenue of all goods as per Income Statement” is PAO Severstal’s Audited Financial Statement 2019. The values/volumes for the lines starting from “Total sales revenue/quantity of all goods sold during the POI”) are taken from SAP ERP.

Appendix reference: Annex A6.5-d Audited Financial Statement 2019

B2 Captive sales

If your company sells the like goods and/or good subject to review to associated companies for further processing, transformation, or assembly (captive sales) please complete **Section B – Sales**, subsection **B2 – Captive sales**.



B3 Sales to the UK

B3.1 Overview

1. Please describe your company's channels of distribution to the UK, from the factory gate to the first sale to an independent buyer. Please provide your terms of sale and pricing to each customer category (e.g. traders, distributors, wholesalers, industrial users, end users, etc.) including associated companies. Use this box to explain how you have categorised customers in your sales data in **Section B3.2** (see below).

Sales to the EU are made through Severstal Export GMBH ("Severstal Export") and SIA Severstal Distribution ("Severstal Distribution"). Sales to other export countries are made through Severstal Export GMBH ("Severstal Export"). Terms of sale typically do not depend on a customer category. General flow chart showing the structure of export sales of Severstal is attached as Annex B3.1 Channels of distribution export

Appendix reference: Annex B3.1
Channels of distribution export

2. Please describe each step in the sales negotiation process, from the first contact with the customer up to and including any after-sale price adjustments (commissions, discounts, rebates and allowances). Please include a description of how the process varies for different customer categories/levels of trade.

Generally, the customer contacts Severstal Export or Severstal Distribution. The proposed order is then sent to Severstal. The Severstal sales person will determine whether the goods requested can be manufactured and will come up with a price. The price will then be reviewed to determine whether it meets the internal guidelines and whether to accept the offer. If the offer is accepted an order is sent to the production line and the goods are produced. Once the goods are produced, a mill test certificate is sent to the Sales Department with the details (including exact quantity) of the order. Using this document an invoice is prepared. The goods will generally be shipped in the day of the invoice is completed. The process is the same for different customer categories.

Appendix reference: Not applicable.

3. Please describe in detail how the contract terms (for example prices, quantities and payment terms) are agreed. Explain the penalties on either party if the contract is terminated early.

The exact prices, quantities and payment terms are agreed with each client in specifications to a contract. A contract sets general conditions of business relationship between PAO Severstal and a client (such as transportation, acceptance of goods, claims and disputes resolution etc.).



No penalties are set on either party if the contract is terminated early.

Appendix reference: Not applicable.

4. Please explain your production scheduling. For example, do you produce to order or maintain continuous production and hold stock?

Production begins after the customers have established their product specifications and the sale has been made. In general, production begins in the month following the month, when a customer has provided the product specifications and ordered the product.

Appendix reference: Not applicable.

5. Provide copies of all price lists applicable during the POI for all customer types in the UK, including those used by associated companies. Explain your pricing procedure and whether sales prices differ between or among grades, types or specifications of the goods subject to review, or among customers, regions or time periods.

Severstal does not maintain the price lists for the export sales. Price quoted by a customer is compared to market levels from different sources for the product and geographical region and checked for sufficiency to cover distributional expenses and company's normal margin. In case a customer's order passes all the checks and requirements along with proper agreed financial security, it's released for production.

Appendix reference: Not applicable.

6. Please provide copies of the relevant policy documentation for the duty drawback schemes and export VAT schemes.

Export sales of the product under investigation are not the subject of VAT, therefore this question is not applicable. Custom export duties for the product under investigation are zero.

Appendix reference: Not applicable.

7. For all sales through associated companies, please provide a detailed description of how sales are made, detailing the procedure followed between time of order and delivery to the first independent buyer. Please explain how the invoicing and payments are made.

Sales through related companies are made through Severstal Export GmbH or SIA Severstal Distribution. Severstal Export is a Swiss company that sells to the main part of Europe, except Baltic states. Severstal Export GmbH signs specifications with the customers, invoices them and receives payments, provided logistic control and provides relevant documentation (e.g. packing lists and etc.).

SIA Severstal Distribution is a Latvian company, a part of Severstal Distribution Network, with their own service centres and warehouses.



Severstal Export mostly focuses on shipments of large batches to European service centres and end-users, while Severstal Distribution uses different batch volumes - from wagonloads to collaborated cargos of few tons of different products, makes different types of supplies: deliveries from warehouses and steel service centers of “Severstal Distribution”, direct deliveries from PAO “Severstal” plants and may serve even individuals.

Related traders offer the materials produced by Severstal/Russia to trading companies and final end users. They collect order proposals from the clients and passes them on to Severstal. Severstal then decides whether to accept the order or not. Related traders agree on a contract with the clients and take the title to the goods. Severstal invoices the related traders within 2-5 days after shipment of the ordered products. SIA Severstal Distribution has to pay the invoices within [several] days. Severstal Export GmbH has to pay the invoices within [several] days or has to make a 100% prepayment, depending on the conditions of the agreement with Severstal.

Appendix reference: Not applicable.

8. In relation to questions 1 – 7 above, is anything likely to change if the existing anti-dumping measures on the goods subject to review no longer applied?

No major changes are likely to occur if the existing anti-dumping measures on the goods subject to review are no longer applied.

Appendix reference: Not applicable.

B3.2 UK transactions

In this part, you must provide complete information on sales of the goods subject to review made by your company to the UK for the **POI**.

Please provide the sales information for your company’s sales to all customers in the UK in **Section B – Sales**, subsection **B3 – Sales to the UK, Annex II**. For instructions on filling out and explaining the adjustments for sales to the UK, please see **Section C**, subsection **C1 – Adjustments for export sales to the UK, Annex II** (below).

1. Provide all sales and returns of the goods subject to review to all customers in the UK on a transaction-by-transaction basis. Please report returns or after invoice discounts as negative (-) sales figures. Please also provide the customer category of where transactions occur – are the sales to traders, distributors, wholesalers, industrial or end users? Report each goods sale on a given invoice with a different PCN (see section on [Product Control Numbers](#)) or invoice line as a separate transaction. If there are any other sales costs, charges or expenses incurred which have not been identified in the table above, add a column for each item (see ‘other factors’). For example, other particular selling expenses incurred.



See Section C for further information on how to record adjustments in this table.

2. If your sales have not been made on a CIF basis, explain below how you have calculated the CIF values included in the CIF value in accounting currency column in **Section B – Sales**, subsection **B3 – Sales to the UK, Annex II**.

There were no sales by PAO Severstal to the UK in the POI.

Appendix reference: Not applicable.

3. Please list any costs incurred by your associated companies which have been paid or reimbursed by your company, directly or indirectly linked with the goods subject to review. In detail, explain the types of costs listed.

Not applicable.

Appendix reference: Not applicable.

4. Select two invoices from two different customers relating to sales to the UK during the POI. Provide a complete set of documents for these sales. For example:

- purchase order;
- order acceptance;
- commercial invoice;
- applicable discounts or rebates;
- credit/debit notes;
- long or short-term contract of sale;
- inland freight contract;
- bank documents showing proof of payment;
- details of any tax rebates; and
- documents relating to transport.

Not applicable.

Appendix reference: Not applicable.

5. If the existing anti-dumping measures on the goods subject to review no longer applied, how would you change your export pricing policy?

No major changes are likely to occur if the existing anti-dumping measures on the goods subject to review are no longer applied.

Appendix reference: Not applicable.

B4 Domestic sales



B4.1 Overview

1. Please describe your company's channels of domestic distribution, from the factory gate to the first sale to an independent buyer. Please provide your terms of sale and pricing to each customer category (e.g. traders, distributors, wholesalers, industrial users, end users, etc.) including associated companies. Use this box to explain how you have categorised customers in your sales data in **Section B4.2** (see below).

Generally, Severstal has two channels of distribution for the product under investigation in the Russian market. Sales are either made directly to the customer or through re-sellers. In both cases, Severstal sells the products to order and does not maintain any finished goods inventory at its production facilities. Terms of sale typically do not depend on a customer category.

The flow chart for the distribution channels for domestic market is attached as B4.1 Channels on domestic market.

Severstal sold like goods in the domestic market at EXW and CPT basis. The payment terms vary from prepayment, partial prepayment to mixed payment and acceptance. It could be cash or cash equivalent, bank transfer and others.

Severstal selling prices of the like goods sold in the domestic market do not vary depending on the channel of distribution.

Severstal also sells to an affiliated re-seller, AO Severstal Distribution (former name ZAO "TD Severstal Invest"). Severstal Distribution maintains warehouses throughout Russia. The sales of Severstal Distribution can be either direct to the customer or from the warehouses.

Severstal Distribution is not a selling agent, and Severstal does not pay a commission to Severstal Distribution for home market sales of the subject goods.

Severstal does not have any agency or distributor agreements.

Categorisation of customers is made on the basis of customer activities

Appendix reference: Annex B4.1a
Channels on domestic market

2. Please describe each step in the sales negotiation process, from the first point of contact with the customer up to and including any after-sale price adjustments (commissions, discounts, rebates and allowances). If this sales process varies between customer categories/levels of trade, please describe each variation separately.

Negotiating purchase agreements in Russia can be a lengthy process. Therefore, it is common in Russia to negotiate long-term (framework) agreements. These



agreements specify the terms of sale and delivery and generally the goods to be produced and may have some indicative prices and quantities. But the agreements do not require that goods be purchased or sold at specific prices for specific quantities.

During the course of the year, customers will negotiate individual purchases for specific prices and quantities and these individual purchases will become an addendum to the contract.

On the domestic market for all types of customers, both in cases of sales through resellers or to end users, the sales process is the same.

Generally, the customer will contact Severstal. The Severstal sales person will determine whether the goods requested can be manufactured and will negotiate a price. The price will then be reviewed to determine whether it meets the internal guidelines and whether to accept the offer. If the offer is accepted an order is sent to the production line and the goods are produced. Once the goods are produced, a mill test certificate is sent to the Sales Department with the details (including exact quantity) of the order. Using this document an invoice is prepared. The goods will generally be shipped on the day of the invoice is completed.

Severstal Distribution is an independent company with its own selling practices. For example, it does not use the same internal guidelines as those used by Severstal. Severstal Distribution's customers either contact a Severstal Distribution sales person or in some instances a sales person for Severstal Distribution will contact the customer. In the case where the customer contacts Severstal Distribution, the customer indicates the product needed and the quantity. The sales staff first determines where the product is available in a warehouse and if so in what quantity. Severstal Distribution first tries to sell products out of the warehouse. If the product is available, Severstal Distribution and the customer negotiate a price. This type of sale is referred to as a "warehouse sale."

In those instances where a larger order is necessary, Severstal Distribution will negotiate a preliminary price with the customer. Severstal Distribution then contacts Severstal to determine whether the product can be produced and whether the price is acceptable. If Severstal accepts, the contract with the customer is completed and a contract between Severstal and Severstal Distribution is completed. The goods are produced and shipped directly from Severstal to the unaffiliated customer. Severstal invoices Severstal Distribution and Severstal Distribution invoices the final customer and collects payment. These sales are referred to as "transit sales."

The quantity, delivery point and days between order and shipment are the major differences between "warehouse sales" and "transit sales". The smallest quantity Severstal generally sells (for transit sales of Severstal Distribution) is a railway car capacity, but in sales from warehouses, Severstal Distribution may sell as little as one sheet of product under investigation.

In most cases Severstal ships products by railway and is not involved in further transportation, but Severstal Distribution may provide transport services to the gates



of customers. Sales from warehouses are for immediate delivery. Severstal itself does not stock finished goods. Therefore, the goods must be ordered in advance.

Appendix reference: Not applicable.

3. Please explain your production scheduling. For example, do you produce to order or maintain continuous production and hold stock?

Generally Severstal is taking orders for the production and shipment of a particular month, i.e. the company forms August production plan in July. After the customers have established their product specifications and the sale has been made (all documents – contract, order - have been are signed by both parties), the order is sent to production shop. If the term of sale is prepayment or partial prepayment, the system is put a ban on the production till receipt of money or the bank guarantee for the client. If the term of sale is acceptance or after money receipt for prepayment, the planners in the shop combine similar orders in manufacturing campaign and decide when it will be made.

Appendix reference: Not applicable.

4. Provide copies of all price lists issued or in use during the POI for all customer types in in your country, including those used by associated companies. Explain your pricing method and whether sales prices vary between grades, types or specifications of the goods subject to review and/or like goods, or among customers, regions or time periods.

Severstal does not maintain price lists per se. It does though provide internal guidelines to its sales people. Internal price guidelines are attached as Annex B4.1b Internal price guidelines. It also calls “base price”. Additionally there is a “list of extras and discounts”. Please refer to Annex B4.1c List of extras.

Using “base price” and “list of extras” each sales manager has full range of effective prices (i.e. finish prices for customer on any production position on EXW basis), but this range reflects the minimal permitted level of sales prices only.

Finally, the prices are agreed individually between Severstal’s sales manager and the client.

Appendix reference: Annex B4.1b Internal price guidelines, Annex B4.1c List of extras

5. Explain how sales prices are set and whether sales prices vary between grades, types or specifications of the goods subject to review and/or like goods, or among customers, regions or time periods.

The pricing mechanism is described in the answer to the question above. The impact of customer location, grades and other technical features of the merchandize on prices can be seen in the presented list of extras.



Appendix reference: Not applicable.

6. In relation to questions 1 – 5 above, is anything likely to change if the existing anti-dumping measures on the goods subject to review no longer applied?

No major changes are likely to occur if the existing anti-dumping measures on the goods subject to review are no longer applied.

Appendix reference: Not applicable.

B4.2 Domestic transactions

In this part, you must provide complete information on sales of the like goods made by your company to associated and non-associated customers on the domestic market for the **POI**.

Please provide the sales information for your company's sales to all customers in your domestic market in **Section B – Sales**, subsection **B4 – Domestic sales, Annex II**. For instructions on filling out and explaining the adjustments for domestic sales, please see **Section C**, subsection **C2 – Adjustments for domestic sales, Annex II** (below).

1. Provide all sales and returns of the like goods to all customers in your domestic market on a transaction-by-transaction basis. Please report returns or after invoice discounts as negative (-) sales figures. Report each goods sale on a given invoice with a different PCN (see Section A) or invoice line as a separate transaction. If there are any other sales costs, charges or expenses incurred which have not been identified in the table above, add a column for each item (see 'other factors'). For example, other particular selling expenses incurred.

See Section C for further information on how to record adjustments in this table.

2. Select two invoices from two different customers relating to sales to domestic customers during the POI. Provide a complete set of documents for these sales. For example:
 - purchase order;
 - order acceptance;
 - commercial invoice;
 - applicable discounts or rebates;
 - credit/debit notes;
 - long or short-term contract of sale;
 - inland freight contract; and
 - bank documents showing proof of payment.



The copies of two invoices from PAO Severstal to two different independent customers on domestic market are attached as Annex B4.2 Sample invoices domestic market.

Appendix reference: Annex B4.2 Sample invoices domestic market

B5 Currency

1. Please provide details for any sales of foreign currency on forward markets directly linked to your export sales.

The company holds funds in various currencies, including foreign ones. When revenue in foreign currency from export sales is received, the company is guided by the market situation, as well as by the forecast of a change in liquidity position. In most cases, the company leaves currency in its accounts without conversion. Various instruments such as direct sales to banks and derivatives market instruments are available to the company.

Appendix reference: Not applicable.

2. Please provide details regarding any activities that your company carries out in relation to foreign currency that impacts upon your financial position.

Currency risk arises when a Group entity enters into transactions and has balances denominated in a currency other than its functional currency. The Group has assets and liabilities denominated in several foreign currencies. Foreign currency risk arises when the actual or forecasted assets in a foreign currency are either greater or less than the liabilities in that currency. In order to reduce the sensitivity to a currency risk the Group makes best effort to match cash inflows and outflows in the same currency. The foreign currency risk exposure breakdown of the Group can be seen on p. 92(93) of [Severstal annual report 2019](#).

Appendix reference: Not applicable.

B6 Sales to other countries

In this part, you are requested to provide information on sales of the goods subject to review and/or like goods made by your company to the other countries you export to (by volume).

1. Please provide aggregated sales data for the goods subject to review and/or like goods to all customers in all export destinations. Please also indicate at what level of trade these transactions occur – are the sales to traders, distributors, wholesalers, industrial or end users?



The sales data for the subject merchandize to all customers in all export destinations is present in appendix B6 - Sales to other countries. There are only end-users and resellers in the client list. This information about each customer can be found in the column "Customer type" of the appendix.

Appendix reference: Annex B6 - Sales to other countries

2. Select two invoices from two different customers concerning sales to the top three countries during the POI. Provide a complete set of documents for these sales. For example:
 - purchase order;
 - order acceptance;
 - commercial invoice;
 - applicable discounts or rebates;
 - credit/debit notes;
 - long or short-term contract of sale;
 - inland freight contract; and
 - bank documents showing proof of payment.

The copies of two invoices from PAO Severstal to two different independent customers from top three countries on export markets in the POI are attached as Annex B6a Sample invoices export unrelated.

Appendix reference: Annex B6a Sample invoices export unrelated

3. Please provide transaction-by-transaction sales information for your company's sales to all customers in your top three export destinations (by volume) excluding the UK in **Section B – Sales**, subsection **B6 – Sales to other countries**. Report each goods sale on a given invoice with a different PCN (see Section A) or invoice line as a separate transaction. If there are any other sales costs, charges or expenses incurred (such as other particular selling expenses) that have not been identified in the table, add a column for each item (see 'other factors'). For instructions on filling out and explaining the adjustments for sales to the UK, please see **Section C** below.
4. Where your sales have not been made on a CIF basis, explain how you have calculated the CIF values included in the Excel column labelled 'CIF value in accounting currency'.

The total transportation costs were divided by distance in kilometres and then multiplied by the total distance from Cherepovets, Russia to the respective border crossing point (e.g. Zuhul, Azerbaijan).
Due to terms of sale the appropriate amount were add or deducted to the agreed price for calculation of CIF value.

Appendix reference: Not applicable.



5. Select two invoices from two different customers relating to sales to the countries stated in question **B6.3** during the POI. Provide a complete set of documents for these sales. For example:
- purchase order;
 - order acceptance;
 - commercial invoice;
 - applicable discounts or rebates;
 - credit/debit notes;
 - long or short-term contract of sale;
 - inland freight contract; and
 - bank documents showing proof of payment.

As there were no sales to the UK in the POI, the question seems identical to the question B6.2. Hence, please refer to Annex B6a Sample invoices export unrelated.

Appendix reference: Annex B6a Sample invoices export unrelated



SECTION C: Fair comparison

To do a fair comparison between the normal value and the export price, adjustments may be required. All adjustment claims will need to show how the factor concerned is one which affects price comparability.

To claim and evidence adjustments, the following sections request details on the adjustments that your company may claim, and the information that should be provided and/or kept to verify these claims.

This section is divided into subsections **C1 – Adjustments on export sales** and **C2 – Adjustments on domestic sales**. Please complete those questions that relate to adjustments which you wish to claim and report all charges in your accounting currency.

C1 Adjustments on export sales

Adjustments should be made for each transaction in the relevant columns of the transaction-by-transaction lists requested in **Section B – Sales, subsection B3 – Sales to the UK and B6 – Sales to other countries, Annex II**.

Please report actual expenses where possible. If you allocate any of these expenses across goods, explain the method used and the reason for your choice.

In the export sales database PAO Severstal reported VAT taxes expenses, freight packing and credit expenses. The essential information about each of the expenses is provided in answers to the questions below.

Appendix reference: Annex B6 – Sales to other countries.

C1.1 Differences in discounts, rebates and quantities

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above, based on discounts, rebates and quantities. Any claim should be properly quantified and linked or allocated to the relevant transactions in the transaction-by-transaction sales listing in **Section B – Sales, subsection B3 – Sales to the UK** and subsection B6 – Sales to other countries.
2. Please detail your policy for granting discounts and rebates to customers in the UK and to third countries.

Not applicable.

Appendix reference: Not applicable.



3. Please list all the types of discounts or rebates you granted for sales of the goods subject to review and/or like goods during the POI and describe their terms, including:
- cash discounts;
 - deferred discounts;
 - quantity discounts;
 - loyalty discounts;
 - year-end rebates, etc.

Not applicable.

Appendix reference: Not applicable.

4. If discounts or rebates vary by customer category/level of trade, please explain separately the discounts and rebates given to each category.

Not applicable.

Appendix reference: Not applicable.

5. Please provide your discount schedules and be prepared to provide, on request, contracts or agreements that reflect all discounts and rebates given.

Not applicable.

Appendix reference: Not applicable.

C1.2 Differences in transportation, insurance, handling, loading and ancillary costs

An adjustment may only be made for transportation costs incurred for moving products from production premises to non-associated and associated customers.

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above. Adjustments may be based on the cost of domestic freight associated with the transportation, insurance, handling, loading and ancillary costs which are included in the export prices.
2. Please explain how you have quantified each of these charges and identify the account(s) where each expense is recorded.

The only reported charge, which is included in the export prices, is freight cost. This transportation cost includes the insurance and Severstal is not able to disaggregate these costs from the freight paid.

Severstal does not perform any handling, loading and ancillary operation outside of factory. The costs of handling and loading within the factory are included in the selling expenses of the company.



Appendix reference: Not applicable.

C1.3 Differences in packing expenses

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above.
2. If the goods are subsequently repackaged, please report these charges and costs separately in **Section B – Sales**, subsection **B3 – Sales to the UK** and subsection **B6 – Sales to other countries** and identify the account(s) where each expense is recorded.

The packing expenses are a part of manufacturing & rerolling expenses. They include costs borne on preparation of transportation vehicles. They are written-off to GL account [number] Selling expenses.

Appendix reference: Annex C1.3 Packing expenses export markets

C1.4 Differences in cost of credit granted

Credit means the cost of the time the buyer is given to pay for the goods, and is usually agreed in the terms of payment. A credit adjustment should be made even if funds are not borrowed to finance the accounts receivable.

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above, based on the cost of credit granted.
2. Please attach applicable interest rates over each month of the POI and in the box below explain the nature of the interest rates most applicable to these export sales.

Since all export countries in the POI are geographically close to Russia, PAO Severstal used the same credit rate as it was used for the domestic market. For details please see answer to the question 2 in the C2.9 section.

Appendix reference: C2.9 Weighted average rate calculation, C2.9 Bank of Russia the key rate

C1.5 Differences in after sales costs

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above, based on after sales costs.
2. Please include relevant sales contracts and documentation that supports adjustments claimed in the question above (e.g. warranty and guarantee



expenses and technical assistance and other services), including the basis of any allocations.

Not applicable.

Appendix reference: Not applicable.

C1.6 Differences in commissions paid

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above, based on commissions paid, and identify the account(s) where each adjustment is recorded.
2. Please explain the terms under which commissions are given.

Not applicable.

Appendix reference: Not applicable.

C1.7 Other factors

An adjustment may also be made for differences in other factors not provided for under C1.1 to C1.6 if it is demonstrated that they affect price comparability. Please list any factors here and provide supporting evidence:

Not applicable.

Appendix reference: Not applicable.

C2 Adjustments on domestic sales

Adjustments should be made for each transaction in the relevant columns of the transaction-by-transaction lists requested in **Section B – Sales**, subsection **B4 – Domestic sales, Annex II**. All charges must be reported in your accounting currency.

Please report actual expenses where possible. Where this is not possible please provide an explanation as to why. If you allocate any of these expenses across goods, explain the reason for your choice and the methodology used.

In the domestic sales database PAO Severstal reported VAT taxes expenses, freight packing and credit expenses. The essential information about each of the expenses is provided in answers to the questions below.

Appendix reference: Annex B4 – Domestic sales



C2.1 Differences in discounts and rebates, including those given for differences in quantities

The term 'rebate' includes credit on current or future purchases, promissory notes, extension of credit, or free goods or services, among others.

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above, based on discounts, rebates and quantities. Any claim should be properly quantified and linked or allocated to the relevant transactions in the transaction-by-transaction sales listing.
2. Please describe in detail your policy for granting discounts and rebates to customers in your country.

Not applicable.
Appendix reference: Not applicable.

3. Please list all the different kinds of discounts or rebates you granted for domestic sales during the POI and describe their terms, including:
 - cash discounts;
 - deferred discounts;
 - quantity discounts;
 - loyalty discounts;
 - year-end rebates, etc.

Not applicable.
Appendix reference: Not applicable.

4. If discounts or rebates vary by customer category, please explain separately the discounts and rebates given to each category.

Not applicable.
Appendix reference: Not applicable.

5. Please provide your discount schedules and be prepared to provide, on request, contracts or agreements that reflect all discounts and rebates given.

Not applicable.
Appendix reference: Not applicable.

C2.2 Differences in domestic freight

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above, based on the cost of freight associated with a sale.



2. Please explain how you have quantified each of these charges and report the adjustments in the transaction-by-transaction sales listing referred to above and identify the account(s) where each expense is recorded.

The freight indicated in the databases is a calculated value that is included in the total price. It is calculated by the Logistics Department based on type of goods and the distance from Cherepovets production facilities to a destination point.

Appendix reference: Not applicable.

C2.3 Differences in physical characteristics

An adjustment can be made to take account of differences in physical characteristics between the goods subject to review and like goods sold in the domestic market where these differences affect price comparability.

1. Please report any adjustments in the transaction-by-transaction sales listing referred to above, based on differences in physical characteristics.
2. Please identify the physical differences between each of your relevant exported goods and domestic goods, separately, by PCN. Please provide a full explanation and supporting evidence of each difference identified and how it affects price comparability.

Not applicable.

Appendix reference: Not applicable.

C2.4 Differences in the level of trade

An adjustment can be made for differences in levels of trade where this affects price comparability.

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above, based on the level of trade.
2. Please explain how you have calculated this adjustment for each different level of trade and provide supporting evidence.

Not applicable.

Appendix reference: Not applicable.

C2.5 Differences in transportation, insurance, handling, loading, and ancillary costs

An adjustment can only be made for transportation costs which were incurred **after** the sale was made, for moving the products from the production premises to the



independent buyer. All charges must be reported in your accounting currency – please refer to **section B5**.

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above and identify the account(s) where each adjustment is recorded.

The transportation costs for CPT sales are included in the net invoice value. They are a part of selling expenses. They are recorded at accounts [number] or [number].
--

Appendix reference: Not applicable.

2. Please list all charges included in the domestic prices and explain how you have quantified each of these charges.

The freight, packing expenses, VAT tax are included in the domestic sales prices. The information regarding each of the expenses is provided in the responses to the questions in sections C2.2, C2.6, C.2.8 of the questionnaire.
--

Appendix reference: Not applicable.

C2.6 Differences in packing expenses

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above based on the cost of production provided for packing as reported in **Section D – Costing information, subsection D4 – Cost of production, Annex II**, and identify the account(s) where each adjustment is recorded.

The packing expenses are a part of manufacturing & rerolling expenses. They include costs borne on preparation of transportation vehicles. They are written-off to GL account [number] Selling expenses.
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Appendix reference: Annex C2.6 Packing expenses domestic market

C2.7 Import charges

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above, based on duty drawback you received for sales to the UK and to third countries.
2. Provide original and English translations of statutes and regulations authorising duty drawback on exported goods and the governing methods used to calculate duty drawback.

Not applicable.

Appendix reference: Not applicable.



3. Please explain the method you used to connect the duty drawback amount to the specific UK sale and to third country sales.

Not applicable.

Appendix reference: Not applicable.

4. Please explain the association between the amount received from the government when you export, and the amount paid for imported materials.

Not applicable.

Appendix reference: Not applicable.

C2.8 Indirect taxes

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above, where differences in indirect taxes affect price comparability.

2. Please explain how you have calculated this adjustment

The amount reported in the column "Taxes" of the Annex B4 - Domestic sales is VAT tax only. Since January 2019, VAT in Russia is 20%. Hence, 20% of a gross invoice value is reported as a tax for each transaction.

Appendix reference: Not applicable.

3. For each tax listed above, provide English translations of statutes and regulations authorising the collection of the tax, including documents explaining the method of calculation, assessment, and payment of the tax.

The VAT tax is regulated by the Chapter 21 of Russian Federation Tax Codex (please see the Chapter in English [here](#)).

Appendix reference: Not applicable.

4. For each tax listed above, separately provide information on the tax base or taxable price, the tax rate, the amount of taxes assessed, any deductions or offsets to the tax and the formula used to calculate the tax amount.

Tax base for VAT is revenue, i.e. gross value of the goods sold. It cannot be deducted and is calculated as 20% of the gross value of the goods sold.

Appendix reference: Not applicable.

5. Specify when you are legally obligated or liable for tax payment. Report when you actually paid taxes and whether you maintain separate accounts for these taxes.



VAT tax is included in price, hence it is paid by a customer. Severstal maintains a separate account for VAT, namely [number].

Appendix reference: Not applicable.

C2.9 Differences in the cost of any credit granted for the sales

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above, based on any credit granted for sales.
2. Specify the relevant interest rate for credit costs for domestic sales.

Severstal did not borrow on a short-term basis during the POI in the home market. The Central Bank of Russia changed the key rate a numerous number of times during the POI. Hence, a weighted-average rate was calculated for the POI. The calculation is present in Annex C2.9 Weighted average rate calculation. The interest rates in the table are according to the Central Bank of Russia and can be found in Annex C2.9 Bank of Russia the key rate.

Appendix reference: Annex C2.9 Weighted average rate calculation, Annex C2.9 Bank of Russia the key rate

C2.10 After sales costs

1. Please report any relevant adjustments in the transaction-by-transaction sales listing referred to above, based on after sales costs.
2. Please include relevant sales contracts and documentation that supports adjustments claimed in the question above (for example, warranty and guarantee expenses and technical assistance and other services), including the basis of any allocations.

Not applicable.

Appendix reference: Not applicable.

C2.11 Differences related to commissions

1. Report any relevant adjustments in the transaction-by transaction sales listing referred to above and identify the account(s) where the adjustment is recorded.

Not applicable.

Appendix reference: Not applicable.

2. If commissions were paid to associated or non-associated sellers, please report the amount of commission expenses and explain the terms under which commissions are given.



Not applicable.

Appendix reference: Not applicable.

C2.12 Other factors

An adjustment may also be made for differences in other factors not provided for under C2.1 to C2.11. These differences must demonstrate that they affect price comparability, in particular where customers consistently pay dissimilar prices in the domestic market as a result of the difference in such factors.

Not applicable.

Appendix reference: Not applicable.



SECTION D: Costs and performance

D1 Turnover

Please complete **Section D – Costing Information**, subsection **D1 – Turnover**, **Annex II** by reporting your total sales after all discounts and excluding taxes.

- If your company accounts are consolidated with accounts of associated companies, create a copy of the table to report **total group** turnover.
1. Please explain how the volume and value of your future sales would be affected if the existing anti-dumping measures on the goods subject to review no longer applied, providing evidence to support your claims. Additionally, please provide quantitative estimates for the next five years (e.g. projections or forecasts) and explain the methodology and assumptions underpinning these estimates in the text box below.

The turnover of PAO Severstal and consolidated turnover are present in appendix D1 - Turnover. The volumes are only provided for “turnover of goods subject to review and like goods” groups because “all goods” & “other goods” groups contain sales of works, services and co- and by-products that are not measured in metric tonnes (like oxygen, water, etc.).

For consolidated turnover it is impossible to select the merchandize under investigation exactly (only product groups are available), so no values/volumes are shown.

No major changes are likely to occur if the existing anti-dumping measures on the goods subject to review are no longer applied. The UK is a distant market for PAO Severstal. It is now shared by local producers and more competitive importers from third countries. So there can be some sporadic non-regular sales if measures are withdrawn. And since Russia is the key market regarding the subject merchandize for PAO Severstal, the total future sales will not be affected much.

PAO Severstal does not make long-term projections for the merchandize market. Hence, no reasonable quantitative estimates can be provided.

Appendix reference: Annex D1 - Turnover

D2 Statement of profit and loss and other comprehensive income

1. Complete **Section D – Costing information**, subsection **D2 – Income statement, Annex II** with information about all the goods your company produces.
 - Please note that extraordinary gains/losses could include start-up costs and non-recurring items of cost that benefit future production, among others.



The allocation method is used to calculate the data provided in Annex D2.1 Income statement.

2. Please attach copies of your (corporate) income tax statements, any other company tax statements and the corresponding tax returns for the POI and the preceding three financial years.

Requested information is provided in Annexes D2.2 and Annexes D2.3
In accordance with the Tax Code of Russian Federation from the year of 2011 a Russian holding company could consolidate its Russian subsidiaries' profits for tax purposes if it holds (directly or indirectly) at least 90% of their shares. Cross-border consolidation is not allowed, nor is consolidation with companies in certain industries (for example, banks, insurance companies, non-state pension funds or professional traders on the securities market can consolidate only with similar companies). The income tax is paid by a responsible participant of consolidated group of taxpayers (CGT) – PAO “Severstal”.
The regional portion of the profits tax in the consolidated tax base is determined for each Group member using a special formula (based on employee headcount and the remaining value of depreciable property). The tax is paid to the regions of the Russian Federation, where the companies - participants of the CTG are registered.

Appendix reference: Annex D2.2 and Annex D2.3

3. If your company incurred any extraordinary costs (such as start-up or ramp up costs) during POI, please provide details of these costs, explaining why they were extraordinary and how they have been included and amortised in your accounts.

Not applicable.

Appendix reference: Not applicable.

D3 Production

1. Please provide separate descriptions of your company's production facilities for all goods that you produce, as well as the goods subject to review and/or like goods. List all facilities involved in the production process, explaining the production activities at the facilities and whether any stages are subcontracted.

Severstal operates fully integrated iron and steelmaking facilities.

[detailed description of equipment and production stages]

A detailed description of Severstal's production facilities is attached as Annex D3.1.



Appendix reference: Annex D3.1

- 2. Describe each stage of the production process of the goods subject to review and/or like goods as produced and sold by your company. To support this, please attach a complete flowchart of the production cycle.

The description of production process is provided in Annex D3.1. The flowchart of Severstal's production process is attached as Annex D3.2.

Appendix reference: Annex D3.1 and Annex D3.2

- 3. Describe the main inputs to the production process and whether the supplier is associated or not. Specify whether these input materials or parts were imported, and whether the input value includes import charges and indirect taxes (for both exported and domestic types).

The major inputs for Severstal's production are [description of main inputs to the production process]

Appendix reference: Not applicable

- 4. Please describe the theoretical and actual weights of the like goods you produce. Please explain how you set and calculate these weights.

[description of calculation methods].

Appendix reference: Not applicable

- 5. Please explain the mass tolerance of the production of the like goods you produce.

According to the main technical conditions for the pipe production (TU 14-105-737-14), the mass tolerance of the goods is $\pm 12\%$. It means that the theoretical weight can differ from the actual weight by $\pm 12\%$.
In accordance with another standard for like goods (GOST 3262), the maximum deviations in the weight of the pipes should not exceed $\pm 8\%$.

Appendix reference: Not applicable

- 6. List any products produced by your company in the same facilities as the goods subject to review and/or like goods, and comment on the ability to switch production.



Severstal produces non-subject products in the same production facilities as the product under investigation.

[description of these products].

Appendix reference: Not applicable

D4 Upwards cost reconciliation

1. Complete **Section D – Costing information**, subsection **D4 – Upwards cost reconciliation, Annex II**, starting from the bottom of the table. Please only fill in white cells and update the formulae as required. If you use any additional formulae to complete the table, please include these. Insert additional columns or rows if needed. Please ensure that the table is completed using your accounting currency.

- Cost of production and quantity of like goods during the POI:
For your like goods, enter the cost of production and the quantity produced during the POI as reported in Annex D12.1 and D12.2. Please provide this information for like goods produced for the domestic market and for export to third countries.
- Cost of production and quantity of goods subject to review during the POI:
For your goods subject to review, enter the cost of production and the quantity produced during the POI as reported in Annex D12.3. Please provide this information for good subject to review produced for export to the UK.
- Cost of production and quantity of any other goods during the POI:
If you produce goods other than the goods subject to review/like goods, please provide the costs of production and quantity produced for each of these goods during the POI. Please note, that the headings (e.g. “Cost of production/quantity of good A during the POI”, “Cost of production/quantity of good B during the POI”, etc.) should be adapted to suit the names of your goods which are not the like goods.
- Total cost of **production**/quantity of all goods during the POI:
Please provide the total cost of production and total quantity of all your goods produced during the POI as shown on your management accounts.

If this figure does not reconcile with the totals of the cost of production and quantity data provided for the previous bullet points, the table will show a variance. Please use the text box below to provide an explanation for the shown variance.



Annex D4 provides data of cost of production and quantity of goods subject to review and other goods produced during POI. The total cost of production/quantity of goods subject to review is the same as reported in Annex D12.1.

It should be noticed that Severstal reported cost of production for all Product Control Number of the goods subject to review sold during the POI in Annex D12.1. Several PCNs were not produced during the POI, Severstal reported the weighted-average costs for such products (please see “Imputed cost of production of goods subject to review which were not produced during the POI” in Annex D4).

Appendix reference: Annex D4 and Annex D12.1

- Change in finished goods inventory:
Please provide the change in finished goods inventory for all your goods during the POI. This can be established by comparing the value of your finished goods inventory at the beginning of the POI with the value of your finished goods inventory at the end of the POI or by obtaining the difference between the cost of goods sold and cost of production.
- Total cost of all goods **sold** during the POI:
Please provide your total cost of all goods sold during the POI, as shown on your management accounts.

If this figure does not reconcile with the sum of the total cost of production of all goods during the POI and the change in finished goods inventory, the table will show a variance. Please use the text box below to provide and explanation for the shown variance.

[description of reconciliation]

Appendix reference: Annex D4 and Annex A6.8

- Difference in total cost of all goods sold between POI and accounting periods:
If the POI and your accounting period are different, please enter the difference between total cost of all goods sold during the POI and the total cost of all goods sold during the accounting period.
- Total cost of goods all sold as shown on your audited Income Statement:
Please provide the total cost of goods sold as shown on your audited Income Statement for the most recent financial year.

2. Please use the text box below to reference any source documentation for the data provided in this annex.



Management accounts of PAO Severstal, Severstal PnL statement FY 2019 and the data from SAP system is used as source documentation for the data provided in Annex D4.

Appendix reference: Annex D4

D5 Capacity

Complete **Section D – Costing information**, subsection **D5 – Capacity, Annex II**.

1. Explain the basis of your calculation of the capacity and the tolling utilisation for the goods subject to review and like goods. (e.g. number of shifts, working days per year, name plate versus actual capacity, idle time for machinery maintenance and changes in the production process etc.)

[capacity and utilization].

Appendix reference: Annex D5

2. If you have plans to begin new product chains or increase current production capacity of goods in the UK market, your domestic market or any other third country markets, please provide us with full details.

[plans to begin new product chains].

Appendix reference: Not applicable

3. Please explain how you expect these plans would be affected if the existing anti-dumping measures on the goods subject to review no longer applied.

Not applicable.

Appendix reference: Not applicable

4. Other than the goods subject to review and like goods, please explain whether the plant production capacity can be used to produce other goods and how this is done. Explain your method for allocating production capacity in this situation.

The production capacity of the plant can be used for the production of products other than the product under investigation, for example, for the production of square, plane-oval or semi-oval tubes. [calculation of production capacity]

Appendix reference: Not applicable



D6 Stocks

1. Complete **Section D – Costing information**, subsection **D6 – Stocks, Annex II**. Explain the difference between your production and purchased goods.

Severstal provides the data of stocks in Annex D6. The information of purchased goods is presented in Section D10 Purchases of like goods.

Appendix reference: Annex D6

2. Please comment on the level and trend of stocks that you have reported above.

[stocks level].

Appendix reference: Not applicable

3. If the existing anti-dumping measures on the goods subject to review no longer applied, how do you expect your stocks would be affected?

Not applicable.

Appendix reference: Not applicable

D7 Joint products and by-products

1. Please explain any waste, scrap or by-products related to the production of the goods subject to review and the like goods. Please explain:
 - how you differentiate your waste, scrap, and by-products;
 - what you do with your waste, scrap, and by-products;
 - how any income or cost from waste, scrap, and by-products is recorded;
 - The average waste, scrap, and by-product ratio resulting from the production process of the goods subject to review and like goods.

The data of waste, scrap and by-product is provided in the answer to the question 12 in A6 Accounting practices.

Also average consumption ratio for the product under investigation in the period of investigation was [number]. It means that 1 ton of finished product in production shops was received [number] ton of semi-finished product (hot-rolled coil).



Appendix reference: Not applicable

2. Please explain how your costs of production (per unit) differ between the goods subject to review and its joint products, and/or the like goods and its joint products, if applicable. Comment on the reason for this difference and explain your method(s) of calculation.

The detailed explanation of calculation of cost of production for the goods subject to review and its joint products is described above.

Appendix reference: Not applicable

D8 Employment

1. Complete **Section D – Costing information** subsection **D8 – Employment, Annex II**.
2. Referring to the direct and indirect labour costs within your costs of production, please describe how you calculate the figures and how these are allocated and apportioned. For example, do you base this on hours of work, units produced, or another method?

Labour costs are accounted on a different cost centers and in accordance with it, the calculation of labour costs is made depending on the cost centers.

Appendix reference: Annex D8

D9 Investments

Please complete **Section D – Costing information**, subsection **D9 – Investments, Annex II**.

1. Please use the box below to explain your investment plans for the next five years, focussing on both new investments and whether or not you plan to bring existing facilities back into operation.

[Severstal investment plans]

Appendix reference: Annex D9



- Please use the box below to explain how you would change your investment plans (if at all) if the existing anti-dumping measures on the goods subject to review no longer applied.

Not applicable

Appendix reference: Not applicable

D10 Purchases of like goods

Please complete **Section D – Costing information**, subsection **D10 – Purchases of like goods, Annex II**.

- Show purchases in value exclusive of VAT and net of credit notes and trade discounts (discounts immediately deducted on the invoice) received from suppliers.
 - Show purchases in volume net of returns outwards (purchases returned to the supplier).
- Give the name(s) of the country/countries of origin and the name(s) of the supplier(s) of the like goods purchased by your company and your associated companies.

Purchases of the merchandize under investigation were only made in 2019 by PAO Severstal. There was only one supplier – [company name]. The purchases were made under the tolling scheme. Severstal is capable of producing such merchandize, but its capacities are fully utilized. Hence, in order to meet clients' needs, Severstal has to use other producers' capacities to produce the merchandize from Severstal's steel.

[description of Severstal purchased services].

Appendix reference: D10 - Purchases of like goods.

- Within your company, do you use any integrated processes in the production of the like goods and/or goods subject to review? If so, please explain.

PAO Severstal mainly produces the merchandize on its own production facilities. [Severstal operations description]

Appendix reference: Not applicable.

- Please explain if your purchasing patterns would change if the existing anti-dumping measures on the goods subject to review no longer applied.



No major changes are likely to occur if the existing anti-dumping measures on the goods subject to review are no longer applied.

Appendix reference: Not applicable.

D11 Profitability and administration, selling and general costs (AS&G)

Please complete **Section D – Costing information**, subsection **D11 – Profitability, Annex II**.

1. Please explain how you calculate profitability, referring to your accounting and bookkeeping methods. Attach a breakdown to show how you have calculated the figures stated in **D11 – Profitability**.

The profitability is calculated according to the explanatory note to the Annual accounting reporting (line 2200 Profit/loss of sales is divided by line 2110 Revenue). This method recommended by the “Regulation on disclosure of information by issuers of equity securities”, dated December 30, 2014.

[Severstal accounting practices].

Appendix reference: Annex D11 and Annex A6.5d

2. Please explain how you calculated your AS&G costs stated in **Section D – Costing information**, subsection **D2 – Income Statement, Annex 11**.

AS&G costs stated in Section D – Costing information, subsection D2 – Income Statement, Annex 11 are calculated according to the Profit and loss statements. The allocation method is used for goods subject to review. The detailed calculation of AS&G costs for good subject to review in POI is provided in Annex D13.

Appendix reference: Annex D11 and Annex D13

D12 Costs of production

1. Please provide the costs of production for:
 - the like goods produced for your domestic market;
 - the like goods produced for export to third countries; and
 - the goods subject to review produced for export to the UK market



by completing **Section D – Costing information**, subsections **D12.1 – CoP for Domestic Market**, **D12.2 CoP, for Third Countries** and **D12.3 – CoP for UK**.

- Provide details for each PCN of your goods during the POI produced by your company.
- If several internal company production or sales codes correspond to the same PCN, report each production or sales code separately.
- If several internal company production or sales codes correspond to the same PCN, report each production or sales code separately.
- Note that subheadings of each line item (e.g. raw materials, energy) must be changed to suit the categorisation of your own cost accounting system.

2. If there are differences in costs for the same PCN between **D12.1 – CoP for Domestic Market**, **D12.2 CoP for Third Countries** and **D12.3 – CoP for UK**, explain and highlight the reasons for the differences in the figures.

Severstal provides COP for the goods subject to review without differentiation into markets, this differentiation is only possible for sales data.
[methodology for reporting PCN].

Appendix reference: Annex D12.1

3. Please state the cost allocation and apportion method used for each PCN for the POI, including an explanation of that allocation and apportion method under each cost type. If you have applied a method different to your standard allocation or apportionment, please explain the reason.

Severstal reported cost of production for all Product Control Numbers of the product under investigation sold during the POI in Annex D12.1.

[methodology for reporting PCN]

Severstal provides information about production volumes and expenses, please refer to Annex D12.2. Calculations of the cost for each reported PCN are presented in worksheets provided as Annex D12.3.

Appendix reference: Annex D12.2 and Annex D12.3

4. Please explain how you finance your production of the goods subject to review and/or like goods, your sources of finance, whether there is any cost of finance associated with the production of the goods subject to review and/or like goods, and how you have reported this in the cost of production figures and company accounts.

The source of production financing is the results of financial and economic activities of Severstal. The detailed description of how the cost of production figures displayed on the company accounts is provided above.



Appendix reference: Not applicable

D13 AS&G costs

1. Please provide AS&G costs for:

- the like goods produced for your domestic market;
- the like goods produced for export to third countries; and
- the goods subject to review produced for export to the UK market

by completing **Section D – Costing information**, subsections **D13.1 – AS&G for domestic market**, **D13.2 AS&G for third countries** and **D13.3 – AS&G for UK**

- Provide details for each PCN of your goods during the POI, produced by your company or an associated party. If several internal company production or sales codes correspond to the same PCN, report each production or sales code separately. If several internal company production or sales codes correspond to the same PCN, report each production or sales code separately. If several internal company production or sales codes correspond to the same PCN, report each production or sales code separately.
 - Note that subheadings of each line item (e.g. sales commissions, supply and client) must be changed to suit the categorisation of your own cost accounting system.
2. Please state the cost allocation and apportion method used for each PCN for the POI, including an explanation of that allocation and apportion method under each cost type.

The detailed information of AS&G costs for goods subject to review during the POI provided in Annex D13. The apportion method is used for each PCN for the POI, the total of AS&G costs corresponds to the AS&G expenses presented in Annex D2 Income statement.

The total cost other indirect expenses presented in Annex D13 is the difference between Selling costs in Annex D13 (the total selling costs is calculated according to the Annexes B4 and B6) and Selling costs provided in Annex D2.

Appendix reference: Annex D13

3. If there are any differences in costs for the same PCN between **D13.1 –AS&G for domestic market**, **D13.2 AS&G for third countries** and **D13.3 – AS&G for UK**, explain and highlight the reasons for the differences in figures.

[methodology for reporting PCN].

Appendix reference: Annex D13



4. Explain the calculation of R&D (research and development) expenses for your goods.

[R&D expenses description].

Appendix reference: Not applicable

5. If your company is part of a consolidated group of companies, explain if reported interest expenses are on a company or consolidated basis. Please explain possible differences between the two amounts and how they have been established. State whether interest has been paid to associated parties and explain the details of the borrowings between the associated companies.

[Interest expenses description].

Appendix reference: Not applicable

6. If your company is part of a consolidated group of companies, explain if reported depreciation charges are on a company or consolidated basis. Please explain possible differences between the two amounts and how they have been established.

[Depreciation charges description].

Appendix reference: Not applicable

D14 Raw materials and input purchases

1. Please complete **Section D – Costing information**, subsection **D14 – Raw material and other input purchases**, detailing the principal purchases with the production of your goods during the POI by your company.
- Please provide a breakdown of cost for any raw materials and other costs (such as energy) that account for over 1% of the cost to make and sell your goods. Please include all purchases of these materials used during the POI.
 - For each reported purchase transaction, describe the input and its characteristics (e.g. grade, purity).
 - Please provide an invoice and any supporting documents for two of your purchases stated within **D14 - Raw material and other input purchases**. Use the box below to give an overview of any supporting documents provided.

The breakdown for raw materials and other costs (energy) that account for over 1% of the cost to make and sell goods during the POI is provided in Annex D14.1.



The copies of invoices for two purchases of PAO Severstal are attached as Annex B14.2.

Appendix reference: Annex D14.1, Annex D14.2

2. If you purchase materials or inputs from associated suppliers, please provide information about how prices are set; the negotiation process on price setting; and any contracts or evidence of price negotiation. Also, in addition to the 'raw materials purchased' sheets for domestic and UK sales, the cost of production of the material by the associated suppliers should be provided on the same basis as requested in the 'raw materials produced' sheets of the cost tables.

PAO Severstal purchases iron ore pellets, iron ore concentrate, coal concentrate and metal scrap from associated suppliers [names of related parties]

Prices for iron ore pellets, iron ore concentrate and coal concentrate, which are presented in Annex D14.1, [pricing information]. The contracts containing information of price setting and the examples of specifications are attached as Annex D14.3.

[Pricing information]

The contracts containing information of price setting and the examples of specifications are attached as Annex D14.3.

Appendix reference: Annex D14.3

3. For material costs purchased from non-associated companies, explain the nature of contractual arrangements. State whether the material costs include transportation charges, duties and other expenses normally associated with obtaining the materials used in production.

[Severstal contractual arrangements]

Appendix reference: Not applicable

D15 Specificities regarding The Russian Federation

1. Are you aware of any distortions in your domestic market related to any of the raw materials or other inputs used in your production of the goods subject to review or like goods? Please, be specific, describe such distortions in detail and provide evidence.



Severstal does not aware of any distortions in the domestic market related to any of the raw materials or other inputs used in our production of the goods subject to review or like goods.

Appendix reference:

2. Are the raw materials or other inputs concerned by the distortions likely to represent a significant cost of production of the goods subject to review and like goods? You should provide a detailed breakdown of the costs of production (including the HS subheadings – 6 or more digits) of the goods subject to review and like goods in your domestic market. Please be specific and detailed in your response, providing evidence to support your claims.

There are no any raw materials or other inputs concerned by the distortions.

Appendix reference:

3. Is the price of the raw materials concerned affected by the distortions on raw materials or other inputs in your domestic market? Explain and provide examples demonstrating how prices of the raw materials or other inputs are affected by the distortions in your domestic market during the POI. Please be specific and detailed in your response, providing evidence to support your claims.

Not applicable.

Appendix reference:

4. What would be representative international markets for any raw material or other input affected by a distortion? Provide prices of such raw material or other input in these markets for the period of investigation. Please provide a specific, detailed explanation of your choice, supported by evidence.

Not applicable.

Appendix reference:

5. Please provide any additional information, not described above, which you think would be useful to help our investigation in assessing the market distortions, including but not limited to:
6. situations/distortions in the domestic market of the exporting country where prices are artificially low;



7. where there is significant barter trade;
8. where prices reflect non-commercial factors; or
9. any other reason, which means it is not appropriate to use the comparable price to determine the normal value of the goods subject to review.
10. Please be specific and detailed in your response, providing evidence to support your claims.

There are no significant distortions in the Russian market. There is a plenty of producers, sellers and resellers, which makes the market competitive. This, in turn, makes it is impossible for certain market participants to manipulate prices.

Barter trade is absent in the Russian market. This also supports the idea of fair market prices for the merchandise in the Russian market.

The domestic prices do not reflect any non-commercial factors. The markets of major inputs required for production of the merchandise are mostly competitive so the prime cost of merchandise is unaffected by any distortions.

Appendix reference:



SECTION E: Other questions

Please note that all questions in this section are optional. If you choose not to provide information to a question in this section, please state this or write 'N/A' in the respective text box.

1. Please indicate any other factors which might have caused the injury to the UK industry.

Other factors which might have caused the injury to the UK industry are the following:

- Ineffective management;
- Wrong investment decisions;
- Low productivity;
- High cost of energy and other raw materials;
- High competition against EU producers;
- Supply chains ineffectiveness

Appendix reference:

2. Would the cause(s) or degree of injury change if the existing anti-dumping measures on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

The above factors are not related to import, to the existing anti-dumping measures on the goods subject to review.

Severstal did not participate in the original EU investigation initiated in 2007 and following expiry review in 2013 as our daughter companies SIA Severstal Distribution Latvia and Severstal Distribution Poland produced the goods subject to review on the EU Customs territory.

Therefore, Severstal was included in a group of "All other companies" with the highest anti-dumping duty. Our information was not used for the calculation of the margin. Now Severstal would like become eligible for an individual anti-dumping margin.

Appendix reference:

3. Please describe how you would expect to be affected if the existing anti-dumping measures on the goods subject to review no longer applied. Where possible, please provide estimates for the next five years (e.g. projections or forecasts) to support your claims.

Severstal did not sell the goods subject to review to the UK in the Period of Investigation and is not going to sell any significant volume to the UK market in the future.

Appendix reference:



SECTION F: Next steps and declaration

Next steps

Once you have completed all parts of the questionnaire the declaration on the following page should be signed by an authorised official.

The questionnaire, annexes and any appendices should be submitted through the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **27 April 2020**. The checklist in Section G of this questionnaire may help ensure your submission is complete.

A confidential and non-confidential version of the questionnaire must be submitted. You can find guidance on how to complete confidential and non-confidential versions at <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#handling-confidential-information>.



Declaration

By signing this declaration, you agree that all information supplied in this questionnaire (whether translated or not) is complete and correct to the best of your knowledge and belief and understand that the information submitted may be subject to verification by TRID.

Company registration number:

Company name:

29.05.2020

Date

Signature of authorised official

PAO Severstal

[
Head of Trade Policy Department

Company Stamp

Name and title of authorised official



SECTION G: Checklist and appendices

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

Section	Please indicate if you have responded to all questions
Section A – Company structure and operations	√
Section B – Sales	√
Section C – Fair comparison	√
Section D – Costing information	√
Section E – Other questions	√
Section F – Declaration	√

Please list any appendices that you have referenced throughout and are attaching along with this questionnaire.

Appendix reference	Document title
Annex A1	Charter of PAO Severstal
Annex A2	Proof of registration of the company
Annex A3	Severstal organizational structure
Annex A4	Corporate structure of Severstal
Annex II	A3 and A4 forms
Annex A6.1	Severstal accounting policy
Annex A6.2	Description of SAP system
Annex A6.3	Basic differentiation cost elements
Annex A6.4	The list of cost centers
Annex A6.5	The audited financial statements
Annex A6.6	The audited financial statements of related companies
Annex A6.7	The consolidated financial statements
Annex A6.8	Severstal's trial balance
Annex A6.9a	Severstal's chart of accounts key
Annex A6.9b	Severstal's chart of accounts
Annex A7.1	Your company's products
Annex A7.3	Pages from catalogue
Annex A8	Product similarity
Annex B1	Upward sales
Annex B2	Captive sales
Annex B3	Sales to the UK



Annex B3.1	Channels of distribution export
Annex B4	Domestic sales
Annex B4.1a	Channels on domestic market
Annex B4.1b	Internal price guidelines
Annex B4.1c	List of extras
Annex B4.2	Sample invoices domestic market
Annex B6	Sales to other countries
Annex B6a	Sample invoices export unrelated
Annex C1.3	Packing expenses export markets
Annex C2.6	Packing expenses domestic market
Annex C2.9	Weighted average rate calculation
Annex C2.9	Bank of Russia the key rate
Annex D1	Turnover
Annex D2.1	Income statement
Annex D2.2	Income tax declaration
Annex D2.3	VAT Declaration
Annex D3.1	Description of the production process
Annex D3.2	The flowchart of production process
Annex D4	Upwards cost
Annex D5	Capacity
Annex D6	Stocks
Annex D8	Employment
Annex D9	Investments
Annex D10	Purchases of like goods
Annex D11	Profitability
Annex D12.1	Cost of production
Annex D12.2	Initial cost sheets
Annex D12.3	Working COP
Annex D13	AS&G costs
Annex D14.1	Raw material & input purchases
Annex D14.2	Sample invoices for purchases
Annex D14.3	Supporting documentation
Declaration	Declaration form

+Add additional rows as required