

Anti-dumping proceeding 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

PAO Severstal’s response to Notice of deficiency regarding disclosure

A3.1, A6.5, Annex II B1, Annex II B3, Annex II B4, Annex II B6, Annex C1.3, Annex C2.6, D3, Annex D4, D7, D8, D10.1, D10.2, Annex D10, D12.3, D13.2, D13.3, D13.4, Annex D13, D14.2, D14.3. Please provide a summary of the omitted information/index omitted data or use appropriate ranges (or any other appropriate method) or provide a more detailed statement of reasons as to why that particular information cannot be summarised. Your company has not satisfactorily demonstrated good cause as to why the information must be treated as confidential in the current version.

Response:

PAO Severstal has revised the list of annexes in the non-confidential version. Please see following list with detailed explanation:

Appendix reference	Document title	Comments / Status
Annex A1	Charter of PAO Severstal	Annex is attached to the current response. The revised file has been submitted in the deficiency response.
Annex A2	Proof of registration of the company	Annex is attached to the current response.
Annex A3	Severstal organizational structure	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex A4	Corporate structure of Severstal	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex II	A3 and A4 forms	The revised Annex is attached to the current response.
Annex A6.1	Severstal accounting policy	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex A6.2	Description of SAP system	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex A6.3	Basic differentiation cost elements	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex A6.4	The list of cost centers	The disclosure of the information could be a significant competitive advantage to a

		competitors. Non-confidential version of Annex is attached to the current response.
Annex A6.5	The audited financial statements	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex A6.6	The audited financial statements of related companies	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex A6.7	The consolidated financial statements	Non-confidential document was attached in the original response.
Annex A6.8	Severstal's trial balance	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex A6.9a	Severstal's chart of accounts key	Annex is attached to the current response.
Annex A6.9b	Severstal's chart of accounts	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex A7.1	Your company's products	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex A7.3	Pages from catalogue	Non-confidential document was attached in the original response.
Annex A8	Product similarity	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex B1	Upward sales	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex B2	Captive sales	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex B3	Sales to the UK	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex B3.1	Channels of distribution export	Non-confidential version of Annex is attached to the current response.
Annex B4	Domestic sales	The revised file has been submitted in the deficiency response.
Annex B4.1a	Channels on domestic market	Non-confidential version of Annex is attached to the current response.

Annex B4.1b	Internal price guidelines	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex B4.1c	List of extras	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex B4.2	Sample invoices domestic market	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex B6	Sales to other countries	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex B6a	Sample invoices export unrelated	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex C1.3	Packing expenses export markets	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex C2.6	Packing expenses domestic market	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex C2.9	Weighted average rate calculation	Non-confidential document was attached in the original response.
Annex C2.9	Bank of Russia the key rate	Non-confidential document was attached in the original response.
Annex D1	Turnover	The revised Annex is attached to the current response.
Annex D2.1	Income statement	The revised Annex is attached to the current response.
Annex D2.2	Income tax declaration	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex D2.3	VAT Declaration	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex D3.1	Description of the production process	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex D3.2	The flowchart of production process	Non-confidential document was attached in the original response.

Annex D4	Upwards cost	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex D5	Capacity	Annex was submitted in indexed form. Non-confidential version of Annex is attached to the current response.
Annex D6	Stocks	Annex was submitted in indexed form. Non-confidential version of Annex is attached to the current response.
Annex D8	Employment	Annex was submitted in indexed form. Non-confidential version of Annex is attached to the current response.
Annex D9	Investments	Annex was submitted in indexed form. Non-confidential version of Annex is attached to the current response.
Annex D10	Purchases of like goods	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex D11	Profitability	Annex was submitted in indexed form. Non-confidential version of Annex is attached to the current response.
Annex D12.1	Cost of production	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex D12.2	Initial cost sheets	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex D12.3	Working COP	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex D13	AS&G costs	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex D14.1	Raw material & input purchases	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex D14.2	Sample invoices for purchases	The disclosure of the information could be a significant competitive advantage to a competitors. Non-confidential version of Annex is attached to the current response.
Annex D14.3	Supporting documentation	The disclosure of the information could be a significant competitive advantage to a

		competitors. Non-confidential version of Annex is attached to the current response.
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Due to changes in disclosure of annexes PAO Severstal has also revised the non-confidential version of our narrative response.

A3.1, A3.2, A4.2, A6.3, A6.4, A6.12, Annex B3.1, B4.1, Annex C2.9, Annex D2.2 and Annex D2.3, Annex D3.1, Annex D3.2, Annex D12.2, Annex D12.3. Please provide a summary of the omitted information. If you are unable to summarise the information, please provide a statement of reasons as to why you are unable to summarise the information. You must satisfactorily demonstrate good cause as to why the information must be treated as confidential.

Response:

Summary of the information for the listed annexes was provided in the response to the question above. All information treated by Severstal as confidential is not publicly available. It is sensitive business-related information regarding Severstal's relationships with third parties (prices / volumes sold / purchased, costs, etc), Severstal's business style and internal management system, etc. Therefore the disclosure of the information could be a significant competitive advantage to competitors registered as interesting parties in the proceeding.

Annex II A4. Due to GDPR requirements in the UK, which mean that we cannot publish personal data on the TRS, we are unable to publish the names contained in the Annex. Please remove all names.

Response:

Annex II A4 has been revised. All names have been removed.

Annex D1, Annex D2.1, Annex D5, Annex D6, Annex D9, Annex D11. Please provide appropriate indexing and/or sufficient explanation of non-confidential summary.

Response:

The provided indexing is fully based on Severstal's confidential response and shows trends of the data. Severstal believes the indexing is appropriate. All listed annexes are required standard forms with exact description of the data content. Severstal believes the name of the forms and description of articles included is sufficient explanation of non-confidential summary.

Please review all answers that refer to a limited annex. For all annexes that are limited with a statement of reasons provided, please ensure that answers in the questionnaire can be understood without the ability to reference the annex.

Response:

As it was noted above PAO Severstal has revised the non-confidential version of our narrative response. Severstal's answers in the questionnaire fully correspond with the questions. If there is

a link to exact number (amount, account, line, etc.) of confidential document, Severstal still believes that the answer can be understood.