



Anti-Dumping Questionnaire (Exporter)

Case TD0003: PSC wire and strands exported from the People's Republic of China

Period of Investigation (POI):	01 January 2019 – 31 December 2019
Injury period:	01 January 2016 – 31 December 2019
Deadline for response:	01 October 2020
Contact details:	David George Lead Investigator TD0003@traderemedies.gov.uk
Completed on behalf of:	JIANGYIN FASTEN STEEL PRODUCTS CO., LTD.

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

Please note that you will have to provide **two copies of your response** - a **Confidential** and a **Non-confidential version**. Both copies should be returned to TRID using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **01 October 2020**.



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S1.4 – Employment and turnover	Error! Bookmark not defined.



Section II of Annex I: Information relating to purchase prices and stocks **Error! Bookmark not defined.**

S2.1 – Purchases and stocks**Error! Bookmark not defined.**

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Signature (Annex I)**Error! Bookmark not defined.**



The scope of this review

Goods subject to review

This review covers certain pre- and post-stressing wires and wire strands of non-alloy steel (PSC wires and strands) exported from the People's Republic of China, described as:

Not plated or not coated wire of non-alloy steel, wire of non-alloy steel plated or coated with zinc and stranded wire of non-alloy steel whether or not plated or coated with not more than 18 wires, containing by weight 0.6 % or more of carbon, with a maximum cross-sectional dimension exceeding 3mm. Galvanised (but not with any further coating material) seven wire strands in which the diameter of the central wire is identical to or less than 3 % greater than the diameter of any of the 6 other wires are not covered by the measures in force and are not subject to this review.

These goods subject to review are currently classifiable within the following commodity code(s)

7217 10 90 10

7217 20 90 10

7312 10 61 91

7312 10 65 91

7312 10 69 91

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. 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.

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*
Product type	Alphabetical	Indicate the type of product W = Wire S = Strand	1
Diameter	Numerical	Indicate the product diameter in mm e.g. 15.23mm = 01523 6.0 mm = 00600	5
Presence of Zinc on coating	Alphabetical	Indicate if the product is galvanised with Zinc N = Not galvanised G = Galvanised with Zinc	1
Tensile strength	Numerical	Indicate the tensile strength of the product concerned, in MPa (megapascals) e.g. 1770 MPa = 1770	4
For Strands only: Number of wires (For Wire put 01)	Numerical	Indicate the number of wires per strand e.g. 7 strand wire = 07	2
For Strands only: Other coating (For Wire put W)	Alphabetical	Indicate other coating besides Zinc N = No other coating besides Zinc A = Coated with wax and polyethylene B = Coated with grease and polyethylene	1



*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 wire (W), with a diameter of 10mm (01000), not galvanised with Zinc (N), a tensile strength of 1440 MPa (1440), constitutes the following Product Control Number: W01000N144001W

A strand (S), with a diameter of 7mm (00700), galvanised with Zinc (G), a tensile strength of 1800 MPa (1800), 7 wires (07) and no additional coating to Zinc (N), constitutes the following Product Control Number: S00700G180007N

Please review the PCN structure for this investigation which is shown here. Please include any comments on the PCN structure in the box provided.

JIANGYIN FASTEN STEEL PRODUCTS CO., LTD has no comment on the PCN structure and has constructed PCN as requested.



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 UK has decided to maintain after EU exit. This transition review will consider whether the anti-dumping amount is necessary or sufficient to offset dumping and whether there would be injury to the UK industry if that amount was removed.

We are seeking your cooperation as a foreign exporter to inform our review of whether the current anti-dumping measure 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. Furthermore, please provide the Case Team with contact details for the producing company of the goods subject to review.

Please provide all the information requested by **01 October 2020**. 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.

Please note that if you do not provide the confidential information and a non-confidential summary (or a statement of reasons why you cannot provide this), TRID 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 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.

Please also 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>



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 www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-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

Parties are considered to be associated or have an association if they meet the definition of “related persons” in the Customs (Import Duty) (EU Exit) Regulations 2018(1), a link to which is here:

<https://www.legislation.gov.uk/uksi/2018/1248/regulation/128/made>

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.

- If any of your subsidiaries or associated companies are also an exporting producer of the goods subject to review, they should **also** complete the main questionnaire. Please make sure you provide your subsidiaries with access to this questionnaire.
- Where your subsidiaries or associated companies are not producers but are involved in the sales and/or marketing of the export goods subject to review to the UK, they should complete Annex I.
- Where your subsidiaries or associated parties are producers but are not involved in the sales and/or marketing of the export good to the UK, they should complete the relevant sections of the questionnaire.



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 responses and non-confidential versions of 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 site verification or remote verification. Site verification 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 and keep a record of these and all related material/documentation to assist with both site and remote verification.

If we need to verify information that you provide by visiting your premises, the Case Team will contact you. After verification, 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 Excel annexes and any calculations made when developing your responses.

Please also note the following points:

- 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 Excel 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 feel you cannot present the information as requested, please contact your Case Team immediately.
- If there is insufficient space in any part of the questionnaire to provide the details requested, please attach appendices. Please ensure that any attachments 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 should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- For all numerical figures, where appropriate please express every third number with a comma (e.g. ‘1,300’ for one-thousand three hundred, ‘1,300,000’ for one million and three-hundred thousand).
- Limit all sales/currency/income figures to two decimal places and use the appropriate currency symbol (e.g. £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.
- 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:	JIANGYIN FASTEN STEEL PRODUCTS CO., LTD.
Legal structure (e.g. Representative Office, Sales Office, Sino-Foreign Joint Venture etc):	Limited Liability Company
Year of establishment:	Year 1995 (The company was founded under the name of JIANG YIN FEI YAN STEEL PRODUCTS Co., LTD , and changed to JIANGYIN FASTEN STEEL PRODUCTS CO., LTD in 2015)
Other operating names:	N/A
Name (point of contact):	[CONFIDENTIAL]
Position:	Manager of financial department
Address:	NO. 3456, ZHENCHENG ROAD, JIANGYIN, JIANGSU, CHINA
Telephone No:	[CONFIDENTIAL]
Email:	[CONFIDENTIAL]
Website:	WWW.CHINAFASTEN.COM

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

Name:	Zhong Lun Law Firm
Address:	28/31/33/36/37F, SK Tower, 6A Jianguomenwai Avenue, Chaoyang District, Beijing 100022, P. R. China
Telephone No.:	[CONFIDENTIAL]
Email:	[CONFIDENTIAL]
Confirm they have signed authority to act (Yes/No):	Yes



Appendix reference: **Exhibit A 1.2 -
Confirming Letter**

A2 About your business

1. 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). Please make it clear whether you are a producer, and if you are not please contact us within seven days with details of the producers that supply you.

During the POI, JIANGYIN FASTEN STEEL PRODUCTS CO., LTD. (hereinafter as “STEEL PRODUCTS”) acted as a producer as well as an exporter of the goods subject to review to countries other than the UK.

Appendix reference: **N/A**

2. Please provide details of any changes in the legal form of your business over the past 5 years, for example, mergers, acquisitions and/or sales.

Date	Legal form	Explanation of change
24/05/2018	Change of person in charge (change of legal representative, person in charge, chief representative, partnership executive, etc.)	[CONFIDENTIAL]
23/05/2016	Change of person in charge (change of legal representative, person in charge, chief representative, partnership executive, etc.)	[CONFIDENTIAL]
11/04/2016	Change of name of shareholder	[CONFIDENTIAL]
02/04/2015	Change in registered capital (change in registered capital, capital amount, etc.)	[CONFIDENTIAL]

+Add additional rows as required.

3. List and explain all authorisations your company has been required to obtain to produce, sell, or to export the goods subject to review. 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.

(1) Application Form for Filing Registration of Foreign Trade Operators According to Measures on Filing Registration of Foreign Trade Operators issued by Ministry of Commerce, “Foreign trade operators who engage in



the import and export of goods or technology shall apply for filing registration with the Ministry of Commerce of the People's Republic of China (hereinafter referred to as the "Ministry of Commerce") or authorities entrusted by the Ministry of Commerce, unless otherwise stipulated by laws and administrative regulations and the Ministry of Commerce." The form is mandatory for the Customs handling import and export declaration inspection and release procedures.

(2) Pollutant Discharge License

Pollutant Discharge License is mandatory for discharging pollutants which may be generated in the production process of goods subject to review.

(3) Production License of Industrial Products

Citizens, legal persons, or other organizations must obtain the License before engaging in production and processing. STEEL PRODUCTS has obtained the production license to produce Pre-stressed Concrete Steel products.

Appendix reference: **N/A**

4. State whether your company is a member of any representative organisation If so, provide a copy of the relevant documentation.

STEEL PRODUCTS is not a member of any representative organisation. Therefore, this question is not applicable.

Appendix reference: **N/A**

A3 Organisational structure

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

1. Please explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure and all sites/locations which are involved in the production, sales and distribution of the goods for domestic and export markets. Clearly indicate the different production stages carried out by your company.

Please refer to Exhibit A 3.1 for STEEL PRODUCTS's internal hierarchical and organisational structure.

STEEL PRODUCTS itself is responsible for production, domestic and export sales of the goods subject to review. And there were three associated companies involved in the production, sales and/or distribution of the goods subject to review on domestic and/or export markets: (1) JIANGYIN HONGYU STEEL PRODUCTS CO., LTD. (hereinafter as "HONG YU"), which is located at No. 3456, Zhencheng Road, Huangtu Industrial Park, Jiangyin City, is a



producer of the goods subject to review; (2) FASTEN GROUP IMP. & EXP. CO., LTD (hereinafter as “FIE”), which is located at No.165 Middle Chengjiang Road, Jiangyin, Jiangsu, China, and FASTEN GROUP IMPORT AND EXPORT HONG KONG LIMITED (hereinafter as “FHK”), which is located at NO. 25 HARBOUR ROAD, WC HK, are involved in export sales of the goods subject to review to other countries except the UK.

STEEL PRODUCTS purchased wire rods to produce goods subject to review. For more details of production stage, please refer to Exhibit D 3.2 for chart of production process.

Appendix reference: Exhibit A 3.1 and Exhibit D 3.2

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.
 - Please provide the name, address, email address and telephone number for an appropriate representative from each company.
 - Please list the activities carried out by each company identified (e.g. manufacturing, administration, sales).
 - Indicate the shareholdings you have in the associated company and the shareholdings that the associated company has in your company.

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 period of investigation (POI), 01 January 2019 – 31 December 2019. Where known, provide details of their activities. Also include, for the last five years:
 - your company’s registered capital;
 - the scope of business; and
 - the composition of the Board of Directors and/or shareholders, including their roles and rights.

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.

The members of the Board of Directors are appointed [CONFIDENTIAL: procedure to appoint directors].



Appendix reference: **N/A**

3. 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;
 - yearly evaluation of the company's business licence issued by the relevant Authority;
 - an independent evaluation of contributed capital;
 - the file submitted to the Authorities for the company's formation,
 - minutes of shareholders' meeting (the latest one, but those of the others should be available for the verification visit)
 - minutes of Board of Directors meeting (the latest one, but those of earlier meetings should be available for the verification visit)
 - minutes of Board of Supervisors meeting (the latest one, but those of earlier meetings should be available for the verification visit)
 - shareholders register/Certificate of Capital Contribution
 - proof of capital paid by the five shareholders with the largest shareholdings. Please note that proof of capital paid by all shareholders listed in the sheet 'Shareholders' should be kept available for the verification visit.

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.

For articles of association and all related documents, please refer to Exhibit A.4.3.a.

For business licence, please refer to Exhibit A.4.3.b.

For registration of the company with the competent authorities, please refer to Exhibit A.4.3.c.

Please noted that the annual inspection for legal entities including limited liability companies, joint-stock corporations, etc. has been ceased since March 1, 2014 in China. Therefore, yearly evaluation of business licence is not applicable.

Regarding to independent evaluation of contributed capital, please refer to Exhibit A.4.3.d for latest capital verification report of STEEL PRODUCTS. Please noted that STEEL PRODUCTS submitted the capital verification report made in 2006 which has been the latest one to make best effort to corporate, however the capital verification is not in line with current investment situation.



For the file submitted to the Authorities for the company's formation, please refer to Exhibit A 4.3.e.

STEEL PRODUCTS has only one shareholder, therefore minutes of shareholders' meeting is not applicable.

For the latest Minutes of Board of Directors meeting, please refer to Exhibit A.4.3.f.

STEEL PRODUCTS has no Board of Supervisors, therefore minutes of Board of Supervisors is not applicable.

For shareholders register/Certificate of Capital Contribution, please refer to Exhibit A.4.3.a.

Regarding to proof of capital paid by the shareholder, please refer to Exhibit A 6.3 for Audited account of 2019, according to which paid-in capital is 214,263,940.80.

Appendix reference: Exhibit A.4.3.a, Exhibit A.4.3.b, Exhibit A.4.3.c, Exhibit A.4.3.d, Exhibit A.4.3.e, Exhibit A.4.3.f, Exhibit A.4.3.g, Exhibit A 6.3

A5 Operational links with other companies or persons

- Please indicate if your company has established long-term agreements with any other company/companies/persons located in the People's Republic of China, the UK or in third countries for production (e.g. sub-contracting). This includes specific tolling agreements, supply and sale of the goods subject to review, or other licensing, technical patent or compensatory agreements. Include:
 - the name and address of the company;
 - an explanation of the nature of the agreement; and
 - if your company has long-term agreements with other companies/persons for the supply of goods destined for internal sale, e.g. captive use, please provide the contract to demonstrate this.

Company name and address	Nature of agreement
STEEL PRODUCTS did not sign long-term agreement with other company or person. This question is not applicable	N/A
	Appendix reference: N/A

+Add additional rows as required.

A6 Accounting practices



1. Give the address where your company's accounting records are kept and can be verified by TRID. If records are maintained in different locations, please indicate which records are kept at which location.

Records address	What records are held?
NO. 3456, ZHENCHENG ROAD, JIANGYIN, JIANGSU, CHINA.	Production, sale, purchase and cost

+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 four financial years, please describe these changes.

The financial year of STEEL PRODUCTS is from 1 January to 31 December.

Appendix reference: **N/A**

3. For your company and any associated parties involved in the production, marketing or sales of the goods subject to review, please attach a copy of your audited accounts for your latest financial year and the previous year. This may include a statement of financial position; statement of profit and loss 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.

For audited accounts for STEEL PRODUCTS's latest financial year and the previous year, i.e. year 2019 and 2018, please refer to Exhibit A 6.3.

Appendix reference: **Exhibit A 6.3**

4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the period 01 January 2016 – 31 December 2019.

STEEL PRODUCTS's accounts have been audited. Therefore, this question is not applicable.

Appendix reference: **N/A**

5. Please provide copies of the following;
 - Trial balance (both original as per system and in excel format). These should be provided in total and in monthly columns for the POI and calendar year. Please ensure that the trial balance for the POI is reconciled with the financial statements provided. Please provide an explanation if this is not reconciled.
 - Management accounts (in total) for which the key numbers (sales, cost of goods sold, gross profit etc) reconcile to the trial balance for the POI and current period.



- Last published accounts for which the same key numbers reconcile to the management accounts.

Please refer to Exhibit A 6.5 for trial balance (both original as per system and in excel format) and relevant documents. For differences that trial balance for the POI is not reconciled with the financial statements, STEEL PRODUCTS has provided adjusting entries in Exhibit A 6.5.

Please kindly noted that STEEL PRODUCTS does not have management accounts. Therefore, relevant questions or files are not applicable.

Appendix reference: **Exhibit A 6.5**

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

Please refer to Exhibit A 6.6 for profit and loss statement/income statement of POI (which is also the most recently completed financial year, i.e. year 2019).

For profit and loss statement of relevant associated parties, please refer to responses prepared by them.

Appendix reference: **Exhibit A 6.6**

7. 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.

For consolidated accounts of Fasten Group, please refer to Exhibit A 6.7.

Appendix reference: **Exhibit A 6.7**

8. Please provide a detailed description of your management information system (i.e. the accounting system, costing system, payroll system, material management system, warehouse management system) and attach:

- your company's chart of accounts (indicating management accounting and financial accounting codes where available)

Please refer to Exhibit A 6.8 for chart of account of STEEL PRODUCTS.

Appendix reference: **Exhibit A 6.8**

9. With reference to the chart showing the main components of your management information system 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).



STEEL PRODUCTS uses ERP system for management of material and stock, uses YONYOU system as accounting system.

Appendix reference: **N/A**

10. Please confirm whether the accruals basis of accounting is applied in relation to the year end financial accounts and in relation to the management accounts. Describe your accounting methodology, where applicable and not already included in the accounting policies, 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 method, 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 costings 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), Last In First Out (LIFO), current cost, standard cost, weighted average cost etc.;
 - ageing/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.

For relevant information of income recognition, please refer to “point 18 - Revenue recognition principle” of “Part III - Main accounting policies and accounting estimates of the Company” (hereinafter referred to as “*Part III*” in this question) of “Notes to financial statements of audit accounts of 2019” (hereinafter referred to as “*the Notes*” in this question). There were no discounts or rebates, sales returns, warranty claims or intercompany transfers during the POI.



For relevant information of depreciation, please refer to “point 9 - Fixed assets and accumulated depreciation” of Part III of the Notes.

For provisions for bad or doubtful debts, please refer to point 4 and point 6 of Part V of the Notes.

Since STEEL PRODUCTS produced only the goods subject to review during the POI, it is not necessary to allocate expenses or costs across goods.

For inventory valuation methods, please refer to “point 8 - Inventory” of Part III of the Notes.

There were no ageing/obsolete inventories during the POI.

For scrap, STEEL PRODUCTS recognized value of scrap based on actual sales unit price. There were no by-products or joint products during the POI.

For damaged or sub-standard goods generated, STEEL PRODUCTS recognized value based on actual sales unit price.

For relevant information of fixed assets, please refer to “point 9 - Fixed assets and accumulated depreciation” of Part III of the Notes.

For treatment of subsidies, please refer to “point 19 - Government subsidies” of Part III of the Notes.

For treatment of foreign exchange gains and losses, please refer to point 6 of Part III of the Notes.

There were no restructuring costs or plant closure costs incurred during the POI.

Appendix reference: **Exhibit A 6.3**

11. If the accounting methods used by your company have changed over the POI, please explain the changes, including dates and reasons for them.

For changes of accounting methods over 2019 (POI), please refer to “point 23- Changes in significant accounting policies and accounting estimates” of Part III of the Notes.

Appendix reference: **Exhibit A 6.3**

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. Show the communication between your own internal codes and those of the PCNs provided in the table [Product Control Numbers](#).

STEEL PRODUCTS does not apply CCN or other type of product code in its daily operation. Instead, the company uses product description in its financial and sales record.

Appendix reference: N/A

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 sells the good(s), please also provide the same relevant details for that company/companies.
3. For each type of the relevant goods exported to the UK by your company, please provide a technical description as well as sales brochures, if available. Please also provide information on:
 - technical characteristics;
 - physical characteristics;
 - any other important factors.

Please refer to [Exhibit A 7.3](#) for sales brochure, which contains technical characteristics, physical characteristics, etc.

Appendix reference: **[Exhibit A 7.3](#)**

Describe all other goods produced or sold by your company in the UK, 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, how are the products you export different to the products made or sold in the UK?

To the best of STEEL PRODUCTS's knowledge, there is no significant difference in technical, physical, and other relevant factors between products exported by STEEL PRODUCTS and those made or sold in the UK.

Appendix reference: N/A



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 and so on.
PCN	PCN stands for 'Product Control Number'. 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 – 'A1A0BB0C000'.
Model	The commercial model or type that your product is sold under.
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; Independent supplier.
Customer name	The name of the customer as stated on the invoice. <i>If the name of the customer (alphabetical input) 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)'.</i>
Customer link	Specify if your customer is associated with your company. Categorical input – Put only one of the following: Independent; Associated.
Customer type	Specify what category your customer is or what level of trade they are. Categorical input – Put only one of the following: Producer; Distributor; Wholesaler; Retailer; Others.
Invoice number	The number on the invoice. <i>Give the number as shown on the invoice.</i>
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. <i>Give the number as shown on the invoice or assign numbers by line item.</i>
Invoice date	The date on the invoice. <i>State the date on the invoice. Use the format DD/MM/YYYY (e.g. 23/05/2019).</i>



Column heading	Explanation
Contract date	The date on which the contract is executed. <i>State the date on the contract. Use the format DD/MM/YYYY (e.g. 23/05/2019).</i>
Purchase order date	The date of the first official offer issued by a buyer to a seller indicating types, quantities, and agreed prices for goods. <i>State the date on the official offer. Use the format DD/MM/YYYY (e.g. 23/05/2019).</i>
Order confirmation date	The date on which the written order confirmation is received, indicating that the order was accepted and is being processed. <i>State the date on the order confirmation. Use the format DD/MM/YYYY (e.g. 23/05/2019).</i>
Bill of lading no.	A bill of lading (or any other appropriate transport document) is issued by a carrier to a shipper that details the type, quantity and destination of the goods being carried. <i>Provide the number as stated on the bill of lading.</i>
Delivery terms	The terms of delivery given on the invoice 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>
Invoice quantity	The quantity of the product as stated on the invoice. Numerical input – <i>Express every thousandth digit with a comma (e.g. 1,200). Do this for every appropriate, subsequent field.</i>
Invoice unit	The unit used to measure or show the quantity of the product in 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>
Quantity in Tonnes	The invoice quantity shown in Tonnes. Numerical input – <i>Where the invoice unit is not the same as Tonnes, where appropriate, convert the invoice quantity to Tonnes (e.g. if original quantity on the invoice is 2,000 kilograms and the unit of measurement asked is in tonnes, convert 2,000 kilograms into tonnes: '2'. Input only as a number.</i>
Destination country	The final destination for the consumption of the goods subject to review.
Exporting country	The foreign country or territory where an overseas exporter exports its goods, 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.



Column heading	Explanation
Gross invoice value	The invoice value inclusive of any taxes. Numerical input – Keep all figures to two decimal places. Use a full stop as a decimal separator (e.g. 1,300.00). Do this for every appropriate, subsequent field. <i>State the figure using the invoice currency.</i>
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, sin tax). Label each tax with a clear and appropriate name such as 'Tax 1', 'Tax 2' and so on, and provide a legend. Type '0.00' if not applicable. <i>State the figure using the invoice currency.</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. Type '0.00' if not applicable. <i>State the figure using the invoice currency.</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. Type '0.00' if not applicable. <i>State the figure using the invoice currency.</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. Type '0.00' if not applicable. <i>State the figure using the invoice currency.</i>
Net invoice value	The cell has a formula, so no action required. However, if new columns were created, 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 Section B – General information Annex II. <i>Show the exchange rate with up to four decimal places (e.g. 0.7575). Provide the 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	The cell has a formula, so no action required. However, if new columns were created, check to see that the formula includes them.



B1 Sales

- Within **Annex II Section B – Sales**, please provide the sales information for your company in **B1.1 – Upward sales reconciliation**. Sales to third (intermediary) countries, where the ultimate destination is the UK, **must** be included in the data.
- Please provide references for any source documentation from which the data provided in the table has been sourced, assigning the relevant appendix number and highlighting where the relevant figures in the document are located.
- If you use any additional formulae to complete the table, please include these.
- Please ensure that the table is complete using your accounting currency.

Please coordinate the responses to each of the relevant sections in this questionnaire with your associated companies and ensure that the sales information for your associated companies to independent customers reconciles fully with the information given.

1. Please explain in the text box below how the volume and value of your future sales would be affected if the existing anti-dumping measure on the goods subject to review was no longer applied. Also provide evidence to support your claims. Additionally, in **B1 – Upward sales reconciliation**, please provide quantitative estimates for future years (e.g. projections or forecasts) that would help illustrate this, and explain the methodology and assumptions underpinning these estimates in the text box below.

Please refer to **Table B1.1 - Upward sales reconciliation**.

STEEL PRODUCTS has no explicit plan on future sales to the UK since there has been no purchase order or inquiry received from the UK customers for now.

Appendix reference: **Table B1.1**

2. If you also sell the goods subject to review to third countries, please explain in the text box below whether they are affected by any anti-dumping, anti-subsidy or safeguard measures. If so, please list:
 - the countries that have imposed these measures;
 - the level and form of the measures;
 - the duration of the measures; and,
 - a weblink to the findings published by the relevant investigating authority.

Among all the third countries where STEEL PRODUCTS exported goods subject to review, no country conducts anti-dumping or anti-subsidy or safeguard measures to PC strands originating from China. Therefore, this question is not applicable.

Appendix reference: **N/A**



B2 Captive sales

If your company has sales that are made between 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 resale to independent customers. 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 B3.1 (see below).

Please kindly noted that STEEL PRODUCTS did not export goods to the UK during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

2. 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.

Please kindly noted that STEEL PRODUCTS did not export goods to the UK during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

3. Please describe in detail how the contracts, prices and quantities are agreed in accordance with sales made in long or short-term contracts. Describe the types of contracts applicable to the goods subject to review, including the terms, price changes and renegotiation by either side, etc. Explain the requirements on either party, should the contract be terminated early.

Please kindly noted that STEEL PRODUCTS did not export goods to the UK during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

4. Please explain production scheduling, such as whether production begins after the customers have established their product specifications (contract/order) and the sale has been made, or according to normal company production schedules.



Please kindly noted that STEEL PRODUCTS did not export goods to the UK during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

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.

Please kindly noted that STEEL PRODUCTS did not export goods to the UK during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

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

Please kindly noted that STEEL PRODUCTS did not export goods to the UK during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

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 customer. Please explain how the invoicing and payments are made.

Please kindly noted that STEEL PRODUCTS did not export goods to the UK during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

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

Please kindly noted that STEEL PRODUCTS did not export goods to the UK during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

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 01 January 2019 – 31 December 2019.



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 Scope of this review - 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 column in **Section B – Sales**, subsection **B3 – Sales to the UK, Annex II**.

Please kindly noted that STEEL PRODUCTS did not export goods to the UK during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

3. Please list any costs incurred by your associated companies which have been paid or reimbursed by your company, directly or indirectly, regardless of whether or not the cost was associated with the goods subject to review. In detail, explain the types of costs listed.

Please kindly noted that STEEL PRODUCTS did not export goods to the UK during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

4. Select two invoices from two different customers regarding 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 at CIF or DDP.
5. Should the existing anti-dumping measure on the goods subject to review no longer be applied, how would you change your export pricing policy?

Please kindly noted that STEEL PRODUCTS did not export goods to the UK during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

B4 Domestic sales

B4.1 Overview

1. Please describe your company's channels of domestic distribution, from the factory gate to the first resale to independent customers. 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 B4.1 (see below).

Please refer to Exhibit B 4.1 for domestic sales flow chart.

Appendix reference: **Exhibit B 4.1**

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, please describe each variation separately.

Please refer to Exhibit B 4.2 for sales negotiation process.

Appendix reference: **Exhibit B 4.2**

3. Does production begin after the customers have established their product specifications (contract/order) and the sale has been made, or does production follow normal company production schedules. Please substantiate your answer.

The Company arranges production pursuant to internal schedules.

Appendix reference: **N/A**

4. Provide copies of all pricelists issued or in use during the POI for all customer types in the People's Republic of China, 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 or among customers, regions or time periods.



STEEL PRODUCTS does not use price lists for domestic sales. Therefore, this question is not applicable.

Appendix reference: **N/A**

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

The domestic sales prices are set based on [CONFIDENTIAL: factors considered by the company for determination of selling prices]. At the same time, domestic sales price can also be influenced by market conditions.

Appendix reference: **N/A**

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

As far as STEEL PRODUCTS knows, there would be no change in domestic sales if the existing anti-dumping measure on the goods subject to review was no longer applied due to the fact that STEEL PRODUCTS did not export the goods subject to review to the UK.

Appendix reference: **N/A**

B4.2 Domestic transactions

In this part, you must provide complete information on sales of the like goods made by your company to independent and associated customers on the domestic market for the 01 January 2019 – 31 December 2019.

Please provide the sales information for your company's sales to all customers in the People's Republic of China 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 the People's Republic of China 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 Scope of this review - 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. Select two invoices from two different customers regarding 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.

Please refer to **Exhibit B 4.2** for two samples of domestic sales documents.

Appendix reference: **Exhibit B 4.2**

B5 Currency conversions

To compare export sales prices with domestic sales prices, a conversion of currency will be required.

1. Provide the central bank exchange rates in your country for the past two years. This should be the official daily selling rate of exchange for the foreign currencies in which your company traded in relation to the export of goods to the UK. Please also provide the same exchange rates for any other countries for which you have provided sales data.

Please refer to **Exhibit B 5.1** for central bank exchange rates in China for the past two years.

Appendix reference: **Exhibit B 5.1**

2. Also provide the actual exchange rates used by your company for converting the payment for export sales into your domestic currency during the POI.

STEEL PRODUCTS adopted the exchange rate at the time of export collection for converting the payment for export sales into domestic currency during the POI. Therefore, please refer to Table B6 for the actual exchange rates.

Appendix reference: **Table B6**

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

There were no such sales of foreign currency during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**



B6 Sales to other countries

In this part, you are requested to provide information on sales of the goods subject to review 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 to all customers in your top three export destinations. Please also indicate at what level of trade these transactions occur – are the sales to traders, distributors, wholesalers, industrial or end users?

Aggregated sales volume for the goods subject to review to top three export destinations is [CONFIDENTIAL: sales volumes to top three export markets].

All the goods subject to review were exported to end users.

For details, please refer to Table B6 - Sales to Other Countries.

Appendix reference: Table B6

2. 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'.

Please refer to Table B6 - Sales to Other Countries, in which formulas showing the method to calculate CIF values. CIF values for non-CIF transactions are calculated based on comparable ocean freight price and insurance premium, which are calculated on the basis of CIF and C&F transactions (i.e. transactions with ocean freight and insurance), as below:

Average ocean freight price: [CONFIDENTIAL: unit ocean freight calculated according to the company's actual data]

Average insurance premium: [CONFIDENTIAL: average insurance premium calculated according to the company's actual data]

Please also note that there were exports to third countries made under [CONFIDENTIAL: specific trade term used by the company] term, in which the ocean freight reported in Table B6 contains the amount [CONFIDENTIAL: specific type of expenses paid by the company]. For those [CONFIDENTIAL: specific trade term used by the company] transactions, STEEL PRODUCTS excluded [CONFIDENTIAL: specific type of expenses paid by the company] according to [CONFIDENTIAL: specific method the company uses to estimate CIF value for non-CIF transactions].

According to Table B6, average ocean freight price for CIF transactions is [CONFIDENTIAL: unit ocean freight calculated according to the company's actual data], and average ocean freight price for [CONFIDENTIAL: specific trade term used by the company] transactions is [CONFIDENTIAL: unit ocean freight calculated according to the company's actual data], the difference is



[CONFIDENTIAL: unit ocean freight calculated according to the company's actual data]. Therefore, for [CONFIDENTIAL: specific trade term used by the company] transaction, STEEL PRODUCTS excluded the amount [CONFIDENTIAL: unit ocean freight calculated according to the company's actual data] * invoice quantity in tonne from net invoice value to estimate the CIF value.

Appendix reference: Table B6

3. 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.

Please refer to Exhibit B 6.3 for two samples of export sales documents.

Appendix reference: Exhibit B 6.3

4. Please provide transaction-by-transaction sales information for your company's sales to all customers in your top two export destinations (by volume) excluding the UK during the POI in **Section B – Sales**, subsection **B6 – Sales to other countries**. Report each goods sale on a given invoice with a different PCN (see Scope of this review - Product Control Numbers) 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, subsection 1.



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 to the UK** and **C2 – Adjustments on domestic sales in the People’s Republic of China, Annex II**. Please complete those questions that relate to adjustments you wish to claim and report all charges in your accounting currency.

C1 Adjustments on export sales

For the questions that follow, please provide information for any sales to the UK and for sales to countries detailed in B6.4.

Adjustments should be made for each transaction in the relevant columns of the transaction-by-transaction lists requested in **Section B – Sales** for all export sales, subsection **B3 and B6, 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.

Since STEEL PRODUCTS produced only the goods subject to review during the POI, it is not necessary to allocate expenses across goods.

Appendix reference: **N/A**

C1.1 Differences in discounts, rebates and 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 the adjustment 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**.
2. Please detail your policy for granting discounts and rebates to customers in the UK and to customers in other countries.



STEEL PRODUCTS did not export the goods subject to review to the UK and it did not grant discounts or rebates to customers in other countries during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

3. Please list all the types of discounts or rebates you have granted and describe their terms including:
- cash discounts;
 - deferred discounts;
 - quantity discounts;
 - loyalty discounts;
 - year-end rebate, etc.

STEEL PRODUCTS did not export the goods subject to review to the UK and it did not grant discounts or rebates to customers in other countries during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

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

STEEL PRODUCTS did not export the goods subject to review to the UK and it did not grant discounts or rebates to customers in other countries during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

5. Please provide your discount schedules. Be aware that at a later date we may request supporting information such as the contracts/agreements reflecting all discounts and rebates.

STEEL PRODUCTS did not export the goods subject to review to the UK and it did not grant discounts or rebates to customers in other countries during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

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

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

1. Please report the adjustment in the transaction-by-transaction sales listing in **Section B – Sales**, subsection **B3 – Sales to the UK**, based on the cost of domestic freight associated with a sale and transportation, insurance, handling, loading and ancillary costs which are included in the export prices.



- Please explain how you have quantified each of these charges and identify the general ledger account(s) where each expense is recorded.

STEEL PRODUCTS did not export the goods subject to review to the UK.

STEEL PRODUCTS reported ocean freight, insurance, domestic freight, Handling, loading and ancillary expenses for export sales to other countries in Table B6.

The above-mentioned export expenses are recorded in general ledger account of “Selling Expense”.

Ocean freight, inland freight and Insurance were reported on actual basis according to the billing records.

Handling, loading and ancillary expenses were reported in column “Domestic Freight” of Table B6, considering of that the inland freight and handling, loading and ancillary are paid to the same logistics company together, and cannot be distinguished.

Appendix reference: **Table B6**

C1.3 Differences in packing expenses

- Please report the adjustment in the transaction-by-transaction sales listing referred to above.
- If the goods are subsequently repackaged, please report these charges and costs separately in **Section B – Sales**, subsection **B3 – Sales to the UK, Annex II** and identify the general ledger account(s) where each expense is recorded.

The goods were not repackaged. Therefore, this question is not applicable.

Appendix reference: **N/A**

C1.4 Differences in cost of credit granted

Credit means the cost of the time the buyer is given to pay the goods (i.e. agreed in the terms of payment). An adjustment is warranted when credit terms for export sales differ from the credit terms for domestic sales. A credit adjustment is to be made even if funds are not borrowed to finance the accounts receivable.

- Please report the adjustment in the transaction-by-transaction sales listing referred to above, based on the cost of credit granted.
- 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. For example, short-term borrowing of the currency concerned.



The interest rate to be used, in order of preference, is:

- the rate, or average of rates, applying on actual short-term borrowings by the company;
- the prevailing prime interest rate for commercial loans in the country for credit terms that most closely meet the credit terms on which the sales were made; or
- another rate considered appropriate in the circumstances (the reasons for which need to be justified below).

The credit costs reported were calculated according to the short-term loan rate 4.35% published by the PBC which is the central bank of China and payment terms (days).

Please refer to Exhibit C 1.4.2 for proof of one-year CNY loans benchmark interest rate, which is 4.35%.

Appendix reference: **Exhibit C 1.4.2**

C1.5 Differences in after sales costs

1. Please report the adjustment in the transaction-by-transaction sales listing referred to above, based on after sales costs.
2. Please show relevant sales contracts and how you calculated the expenses (for example, 'Warranty and Guarantee' expenses and 'Technical assistance and other services'), including the basis of any allocations.
3. Please include a record of expenses incurred. Technical services include costs for service, repair or consultation. If these expenses are closely related to the sales in question, an adjustment will be considered. Please also identify the general ledger account(s) where each expense is recorded.

There were no after sales costs incurred during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

C1.6 Differences in commissions paid regarding sales under consideration

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

There were no commissions paid regarding sales under consideration during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**



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:

There were no other factors. Therefore, this question is not applicable.

Appendix reference: **N/A**

C1.8 Future adjustment

s

In relation to C1.1 – C1.7 above, would anything be likely to change if the existing anti-dumping measure on the goods subject to review was no longer applied?

There would be no change if the existing anti-dumping measure on the goods subject to review was no longer applied since STEEL PRODUCTS did not export the goods subject to review to the UK.

Appendix reference: **N/A**

C2 Adjustments on domestic sales

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

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

Since STEEL PRODUCTS produced only the goods subject to review during the POI, it is not necessary to allocate expenses across goods.

Appendix reference: **N/A**

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.

1. Please report the adjustment 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. STEEL PRODUCTS does not claim adjustments of discounts and rebates.

Appendix reference: **N/A**

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

Not applicable. STEEL PRODUCTS does not claim adjustments of discounts and rebates.

Appendix reference: **N/A**

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

Not applicable. STEEL PRODUCTS does not claim adjustments of discounts and rebates.

Appendix reference: **N/A**

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. STEEL PRODUCTS does not claim adjustments of discounts and rebates.

Appendix reference: **N/A**

C2.2 Differences in domestic freight

1. Please report the adjustment 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 general ledger account(s) where each expense is recorded.

STEEL PRODUCTS used the total domestic freight incurred during the POI for domestic sales divided by the total quantity transported to get the average domestic freight rate then multiply the quantity of each sales.



The domestic freight was recorded in general ledger account of Selling Expenses, the account code of which is [CONFIDENTIAL: account number].

Appendix reference: **N/A**

C2.3 Differences in physical characteristics

An adjustment can be made to take account of differences in physical characteristics between the goods sold in the UK and other third countries and similar types sold in the domestic market.

1. Please report the adjustment 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. Please provide a full explanation of each difference identified.

Not applicable. STEEL PRODUCTS does not claim adjustment of differences in physical characteristics.

Appendix reference: **N/A**

C2.4 Differences in the level of trade

An adjustment can be made for differences in levels of trade where the export price (including a constructed export price) is:

- at a different level of trade from the normal value; and
- the difference has affected price comparability.

These can include any differences which may appear in Original Equipment Manufacturer (OEM) sales and should relate to the distribution chain in both markets.

A difference in price comparability is demonstrated by consistent and distinct variants in seller functions and prices for the different level of trade in the domestic market of the exporting country.

1. Please report the adjustment in the transaction-by-transaction sales listing referred to above, based on the level of trade. The adjustment amount must be based on the market value of the difference.
2. Please explain how you have calculated this adjustment.

STEEL PRODUCTS did not claim for adjustment on level of trade. Therefore, this question is not applicable.

Appendix reference: **N/A**



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

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

STEEL PRODUCTS has reported domestic transportation in Table B4 – Domestic Sales. The domestic freight was recorded in general ledger accounts of Selling Expenses.

For detailed freight for domestic sales, please refer to Table B4.

Appendix reference: **N/A**

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

Where STEEL PRODUCTS is obligated to deliver the goods at customers' place or customers' designated place, domestic price will include domestic freight.

Domestic freight was recorded in general ledger accounts of Selling Expenses according to the amount actually paid.

Appendix reference: **N/A**

C2.6 Differences in packing expenses

1. Please report the adjustment 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, subsections D12.1 to D12.3 – CTM, Annex II** and identify the general ledger account(s) where each adjustment is recorded.

STEEL PRODUCTS does not claim adjustment of differences in packing expenses which was recorded in manufacturing overheads. Therefore, this question is not applicable.

Appendix reference: **N/A**

C2.7 Import charges

For these adjustments, please do the following:



1. Report the adjustment 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.

Please refer to **Exhibit C 2.7** for regulations relevant to duty drawback.

Appendix reference: **Exhibit C 2.7**

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

Please kindly noted that STEEL PRODUCTS did not export the goods subject to review to the UK during the POI, which means all the duty drawback are connected to third country sales.

Appendix reference: **N/A**

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

STEEL PRODUCTS did not import materials during the POI. All the purchased materials were from domestic suppliers. Therefore, this question is not applicable.

Appendix reference: **N/A**

C2.8 Indirect taxes

For these adjustments, please do the following:

1. Report in the transaction-by-transaction sales listing referred to above the amount of any such taxes imposed in the domestic market but rebated or not imposed on sales to the UK and to third countries.
2. List all indirect taxes imposed on the products sold in the domestic market which were either rebated upon exportation or not collected on the products exported to the UK and to third countries.

Part of VAT paid will be refunded to the company upon export of the product under investigation. There was no VAT refunded upon domestic sales of the product under investigation.

Appendix reference: **N/A**



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.

Please refer to **Exhibit C 2.8** for English translations of statutes and regulations authorising the collection of the VAT.

Appendix reference: **Exhibit C 2.8**

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.

1. Domestic sales – VAT

STEEL PRODUCTS reported VAT in **Table B4-Domestic sales**.

Tax rate: VAT tax rate is 13% which was changed from 16% in April 2019.

Formula used to calculate the tax amount:

Tax amount payable = output tax amount for current period - input tax amount for current period

For more information about VAT, please refer to **Exhibit C.2.8** for regulations relevant to VAT, including:

- (1) Provisional Regulations of the People's Republic of China on Value-added Tax (Revision 2017).**
- (2) Notice of the Ministry of Finance and the State Administration of Taxation on the Adjustment to VAT Rates.**
- (3) Announcement on Policies for Deepening the VAT Reform.**

2. Export refund

Please noted that VAT was not reported separately in **Table B6-Export to other countries** due to that export invoice amount was excluded tax.

Tax refund rate during POI was 10%.

Tax refund base: Tax computation basis of tax refund (exemption) for VAT of exported goods of manufacturing enterprises (except for goods of processing with imported materials which are re-exported) shall be the actual FOB of exported goods.

For the formula used to calculate the tax refund amount:

Please refer to Article 5 of “Notice of Ministry of Finance and State Administration of Taxation on Value-added Tax and Consumption Tax Policies for Exported Goods and Services” provided in Exhibit C 2.7.



Appendix reference: **Exhibit C.2.8,**
Exhibit C.2.7

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.

The VAT payable in the current month would be actually paid within the tax declaration time of the following month.

Please refer to article 23 of Provisional Regulations of the People's Republic of China on Value-added Tax (Revision 2017) provided in Exhibit C 2.8 for the legal requirement of tax payment period.

VAT paid would be recorded in account of "22210107 - Taxes payable – VAT-Taxes paid"

Appendix reference: **Exhibit C 2.8**

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

1. Credit refers to the cost of the time the buyer is given to pay the goods, i.e. agreed in the terms of payment at the time of sale. Please report the adjustment 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.

The credit costs reported were calculated according to the short-term loan rate 4.35% published by the PBC which is the central bank of China and payment terms (days).

Appendix reference: **N/A**

3. If your accounts receivable shows that the average number of collection days is different to the payment terms shown in the sales listing, and if domestic prices are influenced by this longer or shorter period, please calculate the average number of collection days and explain the method of calculating it.

Average number of collection days = Average balance of accounts receivable × 360 days/Total sales revenue

Appendix reference: **N/A**

C2.10 After sales costs

1. Please report the adjustment in the transaction-by-transaction sales listing referred to above, based on after sales costs.



2. Please show relevant sales contracts and how you calculated the expenses (for example, 'Warranty and Guarantee expenses' and 'Technical assistance and other services'), including the basis of any allocations. Include a record of expenses incurred. Technical services include costs for service, repair, or consultation. Where these expenses are closely related to the sales in question, an adjustment will be considered. Identify the ledger account where the expense is located.

There were no after sales costs incurred during the POI. Therefore, this question is not applicable,

Appendix reference: **N/A**

C2.11 Differences related to commissions

1. Report the adjustment in the transaction-by transaction sales listing referred to above and identify the general ledger account where the adjustment is recorded.

There were no commissions incurred during the POI. Therefore, this question is not applicable,

Appendix reference: **N/A**

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

There were no commissions incurred during the POI. Therefore, this question is not applicable,

Appendix reference: **N/A**

C2.12 Other factors

An adjustment may also be made for differences in other factors not provided for under C2.1 to C2.11 if it is demonstrated that they affect price comparability, in particular where customers consistently pay different prices in the domestic market because of the difference in such factors.

There were no other allowances reported. Therefore, this question is not applicable.

Appendix reference: **N/A**



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.
- The total turnover must reconcile with the turnover in your financial reporting (accounts).

Please explain how the volume and value of your future sales would be affected if the existing anti-dumping measure on the goods subject to review was no longer applied. Also provide evidence to support your claims. Additionally, please provide quantitative estimates for future years (e.g. projections or forecasts) that would help illustrate this, and explain the methodology and assumptions underpinning these estimates in the text box below

As mentioned above, STEEL PRODUCTS does not have sufficient information as basis to estimate future exports to the UK since there has been no purchase order or inquiry received from the UK customers as for now. STEEL PRODUCTS considers it is highly possible that there would not be exports to the UK even if the existing anti-dumping measure on goods subject to review is no longer applied, since the company has no exports to the UK for many years and there are no applicable distribution channels for the company to start its exports. Regarding future domestic sales and exports to third countries, STEEL PRODUCTS believes that those would not be affected if the existing measure is no longer applied.

Appendix reference: N/A

D2 Statement of profit and loss and other comprehensive income

1. Complete **Section D – Costing information**, **D2 – Income statement**, **Annex II** with information about all the goods your company produces.
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.

Please refer to **Exhibit D 2.2** for copies of income tax statement and VAT declaration statement for the POI and the preceding three financial years, i.e. year 2016 to 2019.



Appendix reference: **Exhibit D 2.2**

3. If your company sells via an associated company, please provide the accounts of that company.

For accounts of associated companies who are involved in STEEL PRODUCT S's sales, i.e. FIE, and FHK, please refer to their respective responses.

Appendix reference: **N/A**

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

There were no such costs incurred during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

D3 Production

1. Please provide a description of your company's production facilities. List all facilities involved in the production process, explaining the production activities at the major facilities and whether any stages are subcontracted.

For STEEL PRODUCTS's production facilities:

No.	Name of Facility	Use
1	[CONFIDENTIAL: name of production facility]	[CONFIDENTIAL: function of production facility]
2	[CONFIDENTIAL: name of production facility]	[CONFIDENTIAL: function of production facility]
3	[CONFIDENTIAL: name of production facility]	[CONFIDENTIAL: function of production facility]
4	[CONFIDENTIAL: name of production facility]	[CONFIDENTIAL: function of production facility]

Please noted that no production stages were subcontracted.

Appendix reference: **N/A**

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

Please refer to Exhibit D 3.2 for chart of production process.



Appendix reference: **Exhibit D 3.2**

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 main input to the production process is wire rod. Suppliers are both associated and independent.

Appendix reference: **N/A**

4. List any products produced by your company in the same facilities as the goods subject to review.

There were no other goods produced by STEEL PRODUCTS in the same facilities as the goods subject to review.

Appendix reference: **N/A**

D4 Upwards cost reconciliation

Complete **Section D – Costing information**, subsection **D4.1 – Upwards cost reconciliation, Annex II**.

- Please complete the blank white cells of the table in **D4.1 – Upwards cost reconciliation**. Please use the box below to reference any source documentation for the data, assigning the relevant appendix number and highlighting where the relevant figures in the document are located.
- If you use any additional formulae to complete the table, please include these.
- Please ensure that the table is completed using your accounting currency.

Please refer to Table D4.1 - Upwards cost.

Appendix reference: **Table D4.1**

D5 Capacity

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

1. Explain your calculation of the capacity and the capacity utilisation for the goods subject to review. What is the basis for calculating your capacity? (For example, number of shifts, working days per year, name plate versus actual capacity, idle time for machinery maintenance and changes in the production process etc.)

The capacity reported is the design capacity of production facility for the goods subject to review.

The capacity utilisation is calculated by:



actual production quantity / production capacity *100%

Appendix reference: **N/A**

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 of your plans. Please explain how you expect these plans to be affected if the existing anti-dumping measure on the goods subject to review were to no longer apply.

Please noted that STEEL PRODUCTS has no plan to start new product chains or increase current production capacity.

Appendix reference: **N/A**

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

The plant production capacity can be used to produce unbounded strand other than PC strand.

Appendix reference: **N/A**

D6 Stocks

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

The stocks of self-produced and purchased products is recorded separately, which can be distinguished by Table D6 – Stocks.

Appendix reference: **Table D6**

2. Do you consider that the level of stocks has been abnormally high in any of the years/periods covered by this investigation? If yes, please explain why you think so.

The level of stocks has not been abnormally high.

Appendix reference: **N/A**

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

Since STEEL PRODUCTS will flexibly adjust the production schedule according to the market and sales situation to avoid inventory backlogs, and due to the fact that STEEL PRODUCTS did not export the goods subject to review to t



he UK, stocks would not change significantly due to the termination of anti-dumping measures on the goods subject to review.

Appendix reference: **N/A**

D7 Joint products and by-products

1. Please indicate the average waste/scrap ratio resulting from the production process of the like goods.

The average waste/scrap ratio resulting from the production process of the like goods is [CONFIDENTIAL: scrap ratio].

Appendix reference: **N/A**

2. Please explain any waste, scrap or by-products related to the production of 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 or by-products is recorded.

There were no by-products generated during the production process, only a small amount of waste products, such as scrap strands, which will be sold.

The income from the sales of waste would be recorded according to the actual payment received.

Appendix reference: **N/A**

3. Please explain whether your costs of production (per unit) differ between the like goods and its joint products, if any. Comment on the reason for this difference and explain your method(s) of calculation.

STEEL PRODUCTS produced only the goods subject to review during the POI. Therefore, this question is not applicable.

Appendix reference: **N/A**

D8 Employment

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

STEEL PRODUCTS counts labour costs according to monthly payroll, instead of hours of work or units produced.



Appendix reference: **N/A**

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 future, focussing on both new investments and whether or not you plan to bring existing facilities back into operation.

STEEL PRODUCTS has no investment plans for the future. Therefore, this question is not applicable.

Appendix reference: **N/A**

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

STEEL PRODUCTS has no plans for new investment to increase production of the goods subject to review even if the existing anti-dumping measure on the goods subject to review were to no longer apply.

Appendix reference: **N/A**

D10 Purchases

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

1. Give the name(s) of the country/countries of origin and the name(s) of the supplier(s) of the goods subject to review purchased and sold by your company and your associated companies.

Please refer to Table D10 – Purchases.

Appendix reference: **Table D10**

2. Show purchases in value exclusive of VAT and net of credit notes and trade discounts (discounts immediately deducted on the invoice) received from suppliers.
3. Show purchases in volume net of returns outwards (purchases returned to the supplier).
4. Within your company, do you use any integrated processes in the production of the subject to review? If so, please explain.



STEEL PRODUCTS purchases wire rod to produce the goods subject to review, without using integrated processes.

Appendix reference: **N/A**

5. Please use the box below to explain if your purchasing patterns would change should the existing anti-dumping measure on the goods subject to review no longer applied.

As far as STEEL PRODUCTS knows, purchasing patterns would not change.

Appendix reference: **N/A**

D11 Profitability and administration, general and selling costs

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 in **D11 – Profitability**.

In Table D11 – Profitability, STEEL PRODUCTS calculates profitability using data reported in Table D2 – Income statement, i.e. profit before tax divided by net sales. During the POI, STEEL PRODUCTS produced only the goods subject to review, so the overall profitability equals to the profitability of the goods subject to review. Also, since STEEL PRODUCTS did not account operating cost and AG&S separately for domestic and export sales, profitability reported for domestic sales and exports of the goods subject to review is the same.

Appendix reference: **Table D11**

2. Your administration, general and selling costs (AG&S) are compiled in **Section D –Costing information**, subsection **D2 – Income statement, Annex II**. Please explain how you calculate what determines your AG&S costs.

Since STEEL PRODUCTS produced and sold only the goods subject to review during the POI, the AG&S for the goods subject to review is allocated from total AG&S according to the percentage of turnover of the goods subject to review in total turnover of all goods. The balance between the turnover of goods subject to review and the total turnover of all goods is the other operating income, the amount of which can be found in Table B1.1 – Upward sales.

Appendix reference: **Table D2**



D12 Cost to make (CTM) in the People's Republic of China; to export to 3rd countries and to export to the UK

1. Please provide the CTM 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,

Section D – Costing information, subsections **D12.1 – CTM for the domestic market**, **D12.2- CTM for third countries** and **D12.3 – CTM for UK**.

- Provide details for each PCN of your goods during the POI, produced by your company or an associated party.
- For each associated party, make a new copy and complete the Excel sheet 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) can 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 – CTM (the People's Republic of China)**, **D12.2 - CTM (3rd country)** and **D12.3 – CTM (UK)**, explain and highlight the reasons for the differences in figures.

There are no such differences. Therefore, this question is not applicable.

Appendix reference: **N/A**

3. Please state the cost allocation method used for each PCN for the POI, including an explanation of that placement under each subheading.

STEEL PRODUCTS uses total cost of each cost factor (i.e. wire rod, direct labour, indirect labour, maintenance, energy, etc.) and total production quantity to calculated average cost per unit of each cost factor. Then, STEEL PRODUCTS calculates manufacturing costs for each PCN by multiplying the average cost of each cost factor with sales quantity of each PCN. For details, please refer to Table D12.1 – CTM in the PRC and notes at the bottom of the table.

Appendix reference: **Table D12.1**

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



The production is financed by income derived from sales of goods produced and short-term borrowings. Costs of finance incurred was recorded in financial costs, which consist part of total AG&S of STEEL PRODUCTS.

Appendix reference: N/A

D13 AG&S in the People's Republic of China, to export to 3rd countries and to export to the UK

1. Please provide AG&S 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,

by completing **Section D – Costing information**, subsections **D13.1 – AG&S for domestic market**, **D13.2 – AG&S for third countries** and **D13.3 – AG&S 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.
- 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 explain the cost allocation and apportion method used for AG&S, for each PCN for the POI, including an explanation of that allocation and apportion method under each cost type.

STEEL PRODUCTS produced only the goods subject to review during the POI. Therefore, this question is not applicable.

Appendix reference: N/A

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

AG&S reported for the same PCN in Table D13.1 – AG&S in the PRC and Table D13.2 – AG&S for 3rd country may be different, because AG&S was allocated first of all between domestic market and third countries, and then allocated to each PCN within that market. Due to the allocation key which is related to sale s value and the different quantity and amount sold of the same PCN in differe d markets, AG&S allocated to certain same PCN in different market (i.e. dome stic and third country) could be different. For detailed explanation on allocatio n method, please refer to Table D13.1 and Table D13.2.

Appendix reference: Table D13.1, Table D13.2



4. Explain the calculation of research and development expenses for your goods.

STEEL PRODUCTS produced only the goods subject to review during the POI. Therefore, all amount recorded under the R&D expenses account was considered as the R&D expenses incurred for the goods subject to review.

Appendix reference: **N/A**

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.

The interest expenses reported is on the company basis, instead of consolidated group.

Appendix reference: **N/A**

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.

The depreciation reported is on the company basis, instead of consolidated group.

Appendix reference: **N/A**

D14 Raw material (RM) and major input purchases

- Please complete **Section D – Costing information**, subsection **D14 – RM purchased, Annex II** detailing the principal RM and major input purchases in **D14** used in the production of your goods during the POI by your company.
 - Please provide a breakdown of cost for any raw materials or major inputs (such as energy) that account for over 5% of the CoP for your goods. This information should include all purchases of these materials used or purchased 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. Use the box below to give an overview of any supporting documents provided.

The only production factor that account for over 5% was wire rods, the total cost of which can be found in Table D2 and Table D12.



Please refer to Exhibit D 14.1 for supporting documents for two purchases.

Appendix reference: Exhibit D 14.1, Table D2 and Table D12

2. If you purchase material from **associated suppliers**, please explain how prices are set and the negotiation process on price setting, and any contracts or evidence of price negotiation. Please indicate in subsection **D14 – RM purchased** whether or not the material purchased comes from an associated supplier.

STEEL PRODUCTS purchased wire rods from associated supplier [CONFIDENTIAL: name of associated supplier], prices were determined according to market situation.

Please refer to Table D14 – RM purchased for purchase information of raw materials.

Appendix reference: Table D14

3. For material costs purchased from independent 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.

The contracts with independent material suppliers are negotiated and signed based on market situation. If suppliers are obligated to deliver materials to STEEL PRODUCTS, the purchase prices will include the transportation fee. There are no other duties (since no imported materials) or expenses.

Appendix reference: **N/A**

D15 Specificities regarding the People's Republic of China

1. If you are 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 provide a detailed description of these distortions.

There are no such distortions. Therefore, this question is not applicable.

Appendix reference: **N/A**

2. If there are market distortions in the raw materials or other inputs used in the manufacture of the goods subject to review or the like goods, are 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 such distortions. Therefore, this question is not applicable.

Appendix reference: **N/A**

3. If the prices of the raw materials concerned are affected by distortions on raw materials or other inputs in your domestic market, explain and provide examples demonstrating how these prices were 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.

There are no such distortions. Therefore, this question is not applicable.

Appendix reference: **N/A**

4. If the prices of raw materials or any other input are distorted, what would be representative international market prices? 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.

There are no such distortions. Therefore, this question is not applicable.

Appendix reference: **N/A**

5. Please provide any additional information, not described above, which you think would be useful to help our investigation in assessing any market distortions, including but not limited to:

- situations/distortions in the domestic market of the exporting country where prices are artificially low;
- where there is significant barter trade;
- where prices reflect non-commercial factors; or
- 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.
- Please be specific and detailed in your response, providing evidence to support your claims.

There are no such distortions. Therefore, this question is not applicable.

Appendix reference: **N/A**



SECTION E: Other questions

1. Please indicate any other factors which might have caused the injury to the UK industry, for example:
- volume and prices of imports not sold at dumped prices;
 - contraction in demand or changes in patterns of consumption;
 - restrictive trade practices of, and competition between, third country and UK producers;
 - developments in technology; and
 - export performance and the productivity of the UK. Would the cause(s) or degree of injury change if the existing anti-dumping measure on the goods subject to review were to no longer apply? Please describe the nature of any change and substantiate your claims with evidence.

There are no such factors which might have caused the injury to the UK industry.

Appendix reference: **N/A**

2. Please describe how you would expect to be affected if the existing anti-dumping measure on the goods subject to review were to no longer apply:
- your production of the goods subject to review
 - your exports of the goods subject to review to the UK
 - market price of the goods in the UK;
- Where possible, please provide estimates for future years (e.g. projections or forecasts) to support your claims.

As far as STEEL PRODUCTS knows, there would not be significant change on production of the goods subject to review. As for exports and market price to the UK, STEEL PRODUCTS does not have sufficient information as basis to estimate future exports to the UK since there has been no purchase order or inquiry received from the UK customers as for now.

Appendix reference: **N/A**



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 **01 October 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 www.gov.uk/guidance/trade-remedies-investigating-dumped-or-subsidised-goods. The Trade Remedies Service will request both a confidential and non-confidential version of your spreadsheet annexes however a non-confidential version does **not** need to be prepared. You can upload a blank version of the annex as the non-confidential version.



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 the UK Trade Remedies Investigations Directorate.

Internal registration number:

Company name:

Date

Signature of authorised official

Company Stamp (if available)

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 tick 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	✓

Electronic data	Please tick if you have provided spreadsheets
INCOME STATEMENT	✓
TURNOVER – Sales summary	✓
UK SALES – List of sales to the UK	No exports to the UK
DOMESTIC SALES – List of all domestic sales of like goods	✓
THIRD COUNTRY – Third country sales	✓
PRODUCTION – Production figures	✓
DOMESTIC COSTS – Costs of goods sold domestically	✓
UK COSTS – Costs of goods sold to the UK	No exports to the UK

+Add additional rows as required.

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

Appendix reference	Document title
Exhibit A 1.2	Confirming letter
Exhibit A 3.1	Internal and organizational structure
Exhibit A 4.3.a	Articles of association
Exhibit A 4.3.b	Business licence
Exhibit A 4.3.c	Proof of registration with competent authorities
Exhibit A 4.3.d	Capital verification report
Exhibit A 4.3.e	Submitted file for formation



Exhibit A 4.3.f	Minutes of Board of Directors meeting
Exhibit A 6.3	Audit accounts
Exhibit A 6.5	Original trial Balance as per system of 2019
Exhibit A 6.5	Yearly trial balance of 2019
Exhibit A 6.5	Monthly trial balance of 2019
Exhibit A 6.5	Adjusting entries 2019
Exhibit A 6.6	Monthly income statement of 2019
Exhibit A 6.7	Consolidated audit reports 2019
Exhibit A 6.8	Chart of account
Exhibit A 7.3	Sales brochure
Exhibit B 4.1	Domestic sales flow chart
Exhibit B 4.2	Domestic sales negotiation process
Exhibit B 4.2.2	Domestic sales documents
Exhibit B 5.1	Central bank exchange rates
Exhibit B 6.3	Export sales documents to Egypt and QATAR
Exhibit C 1.4.2	One-year RMB loans benchmark interest rate
Exhibit C 2.7	Regulations authorising duty drawback
Exhibit C 2.8	Regulations authorising VAT collection
Exhibit D 2.2	Tax declaration files
Exhibit D 3.2	Chart of production process
Exhibit D 14.1	Raw Material purchase contract

+Add additional rows as required