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The scope of this review

Goods subject to review

This review covers 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 3 mm.

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 PSC wires and strands are currently classifiable within the following commodity codes:

7217 10 90 10

7217 20 90 10

7312 10 61 91

7312 10 65 91

7312 10 69 91

The 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

This questionnaire asks for information about your company's production and sales of goods which are like the goods subject to review. Any reference to 'like goods' in this questionnaire refers to goods produced in the UK or imported to the UK from a country other than the People's Republic of China which are like the goods subject to review in all respects, or with characteristics closely resembling them.

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

Product Control Numbers

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



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

Characteristic	Field format	Explanation	Field length*
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.

- W00500N177001W
- W00500N177001W
- W00500N177001W
- W00500N177001W
- W00700N167001W
- W00700N167001W
- W00700N167001W

Internal references relating to the BBRG produced like goods were removed from this non-confidential version.



Instructions

Introduction

The Trade Remedies Investigations Directorate (TRID) of the UK's Department for International Trade will be carrying out a transition review of each trade remedy measure active under the EU system that the United Kingdom (UK) 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 domestic producer to inform our review of whether the current anti-dumping measure should be maintained, varied or discontinued.

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 <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process#registering-your-interest-in-an-investigation> 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

TRID define an association between two parties using 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/ukxi/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 a UK producer of like goods, they should **also** complete this questionnaire. Please make sure you provide your subsidiaries with access to it.
- Where your subsidiaries or associated companies are not producers but are involved in the sales of the like goods, your questionnaire response should include information from those companies.

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 verification visits. Visits can last several days, during which we will want to speak to management and staff to help establish the completeness, relevance and accuracy of the information provided. Within your response to this questionnaire, please provide all formulas and steps used in your calculations and keep a record of these and all related material/documentation to assist with any verification.

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

After the verification process, TRID will prepare a report and share a draft with you. TRID will 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:	Bridon International Limited
Legal structure (e.g. limited company):	Wholly owned division of NV Bekaert
Year of establishment:	1946
Other operating names:	Bridon-Bekaert The Ropes Group/BBRG
Company registration number:	416671
Place of registration:	United Kingdom
Name (point of contact):	Gareth Cook/Steve Weston
Position:	Director
Address:	First Point, Balby Carr Bank, Doncaster, DN4 5JQ
Telephone No:	[REDACTED]
Email:	[REDACTED]
Website:	https://www.bridon-bekaert.com/en-gb

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:	N/A
Address:	N/A
Telephone No.:	N/A
Email:	N/A
Confirm they have signed authority to act (Yes/No):	
Appendix reference:	

A2 About your business

1. Describe the role of your company in the UK market for the like goods (e.g. producer, producer/exporter, producer/importer or producer/distributor).



CARES accredited manufacturer of PSC wire to BS5896 specification. Producer of the like goods, selling directly to users of the like goods.

Appendix reference:

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
July 2016	Limited company	67% Bekaert ownership
July 2018	Limited company	100% Bekaert ownership

+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 like goods. These may include licences, permits or permissions. Indicate if your company is subject to any direct or indirect, quantitative or other, restrictions on any of these activities.

BS EN ISO 9001, 14001, 18001, CARES accreditation

Appendix reference:

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

EWRIS, UK Steel, The Post Tensioning Association

Appendix reference:

5. Please describe all the other products (not including the goods under review or the like goods) produced or sold by your company in the UK.

A brief description of the steel wire and steel wire rope market segments and applications was removed from this non-confidential version.

Appendix reference:

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.

A relevant document was removed from this non-confidential version

Appendix reference: Appendix 1

2. Please describe all sites/locations which are involved in the production, sales and distribution of the like goods for domestic and export markets. Clearly indicate the different production stages carried out by your company.

Relevant sites were listed and processes described but omitted from this non-confidential version.

Appendix reference:

3. Please complete **Annex 1 – Associated companies**.
 - Include your company's worldwide corporate structure and affiliations, including parent companies, subsidiaries and/or other associated companies.
 - If your company is the subsidiary of another company, please give the name of this company, as well as that of your company's ultimate controlling entity, their registration number(s) and place(s) of registration.
 - Please provide the name, address, email address and telephone number for an appropriate representative from the company.
 - Please list the activities carried out by the company (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 **Annex 2 – Shareholdings**, providing a list of all your company's shareholders that owned more than 5% of its shares during the period of investigation (POI), 1 January 2019 to 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.

This description of the process has been removed from this non-confidential version

Appendix reference:

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; and
- proof of registration of the company with the competent authorities.

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

Relevant documents as described above have been removed from this non-confidential version

Appendix reference:

Appendix 2, Appendix 3 & Appendix 1

A5 Operational links with other companies or persons

1. Please indicate if your company has established long term agreements with any company/companies located in the UK, the People's Republic of China or in any third countries for the production (e.g. sub-contracting), supply and sale of the like goods, 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 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	Company registration number	Place of registration
None			



			Appendix reference:

+Add additional rows as required

A6 Accounting practices

1. Give the address where your company's accounting records are kept and contact details for the relevant person, so that these records can be verified by TRID. If records are maintained in different locations, please indicate which records are kept at which location.

Records address and contact details	What records are held?
Address and contact name removed from this non-confidential version.	

+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.

This convention has been removed from this non-confidential version.
Appendix reference:

3. For your company and any associated parties involved in the production, marketing or sales of your goods, please attach a copy of your audited accounts for your latest financial year and the period covering 1 January 2016 to 31 December 2019. 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
 - auditor's opinion on these documents.

Documents submitted not for public viewing due to their company-sensitive nature
Appendix reference: Appendix 5

4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the period 1 January 2016 to 31 December 2019.



Not provided

Appendix reference:

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.

Not provided

Appendix reference:

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:

- POI
- (ii) most recently completed financial year

Not provided

Appendix reference:

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

Documents submitted as described above are not for public viewing

Appendix reference: Appendix 6

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)

Not provided



Appendix reference:

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).

Not provided

Appendix reference:

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



- losses arising from transactions and from the translation of balance sheet items; and

Not provided
Appendix reference:

11. If the accounting practices used by your company have changed over the period of investigation (POI), please explain the changes, including dates and reasons for them.

Not provided
Appendix reference:



SECTION B: About your goods

All references in this questionnaire to “Product Control Number” or “PCN” should refer to all the goods as defined in the table on page 2.

B1 Understanding your like goods

NOTE: within various sections we have given you the opportunity to answer questions separately for wire and stand products, should the situation be different. Please take the opportunity to consider the products in this way.

We use a PCN number to help us compare the goods under review with the domestically produced ‘like goods’. When you are completing this section, you must apply the PCN system set out on page 2 to describe your goods consistently throughout your responses. If you don’t use the PCN table correctly, this could limit TRID’s ability to use the information you provide.

1. Please detail the goods that you manufacture in the UK which are like the goods subject to review. Indicate the degree of physical likeness, commercial likeness and functional likeness.

– W00500N177001W
– W00500N177001W
– W00500N177001W
– W00500N177001W
– W00700N167001W
– W00700N167001W
– W00700N167001W

Internal references relating to the BBRG produced like goods were removed from this non-confidential version

Appendix reference: Appendix 4

PC Strand is no longer produced by our company in the UK

Appendix reference:

2. Please also provide details comparing your like goods and the goods subject to review regarding:

- production processes
- interchangeability



- raw materials used
- degree of model differentiation
- tariff classifications
- channels of distribution and sale
- pricing and other relevant characteristics

If your company manufactures a range of like goods, list this information for each individual make and model in the range. If there are differences in characteristics within your range of like goods which cause distinguishable differences in price, explain those differences and the effect they have.

Appendix reference:

PC Strand is no longer produced by our company in the UK.
Appendix reference:

3. Explain the internal coding system your company uses to classify your range of like goods. If your company uses multiple internal reference codes across departments, cross-reference each one. Cross-reference your internal coding system with any sales (invoice codes) made via related companies.

Technical documentation (such as sales catalogues, safety standards, technical data, etc.) should be attached for each make and model where available.

Appendix reference:

PC Strand is no longer produced by our company in the UK.
Appendix reference:

4. Please complete **Annex 3 – PCN comparison**, indicating which of your like goods (by make or model) are comparable to each of the goods concerned.

Please substantiate your answers by providing details on any likeness and/or differences you have identified between the goods concerned and the like goods. Attach any evidence you have that is relevant. This could take the form of sales brochures, input costs, research papers or any other relevant documentation.

Appendix reference:



PC Strand is no longer produced by our company in the UK.

Appendix reference:

5. If you have identified differences in **Annex 3 – PCN comparison** between the goods concerned and the goods that you manufacture, please estimate the cost and value of each individually. Is there, for example, a production difference with CARES certified products, that would affect cost and/or value?

Where applicable, this should be on a per unit basis. Describe how you established your estimations and substantiate with evidence where possible.

Data provided not for public viewing as company sensitive

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

6. What are the similarities or differences between the like goods entering the UK from any third country (not including the People's Republic of China)?

Please give further details and include any information on end use of the goods.

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

B2 Understanding the UK market

1. Please explain the end use of the goods subject to review and the like goods. If there are multiple uses for the like goods, list them and, where possible, estimate what proportion of your sales goes to each.

Appendix reference:

2. Provide a general description of the UK market for the goods subject to review and the like goods., In your answer please refer to:



- the nature of competition within the overall market;
- the degree of price sensitivity;
- the trends and drivers of demand, including causes of demand fluctuations and any factors contributing to overall market growth or decline;
- distribution and marketing;
- general users/consumers/customers;
- the degree of competition between the goods subject to review and the like goods;
- market segmentation;
- government regulation or tax;
- developments in technology affecting the characteristics, demand or the production process of the goods;
- other commercially significant goods which could be substituted for your goods and the goods being imported into the UK.
- any other factors that influence the market.

Appendix reference:

PC Strand is no longer produced by our company in the UK.
Appendix reference:



SECTION C: Costs, production and sales

C1 Cost to make and sell

1. Complete **Annex 4 – Cost to make and sell**

Report your total cost to make and sell the like goods domestically. Please clearly separate your costs to make (direct manufacturing costs and indirect costs), from your cost to sell (administrative, selling and general expenses (AS&G)).

All values entered in the table should be totals for the period 1 January 2019 to 31 December 2019 by PCN. Report your total production and the total manufacturing costs for your like goods in the final row. All figures should be reported net of tax.

Note that headings of each column (e.g. raw materials, energy) can be adapted to suit the naming conventions of your own cost accounting system.

2. Please list, and explain, your labour, manufacturing overheads and AS&G costs for domestically sold like goods. Describe the individual components of these costs and provide detail on how these costs are paid.

Document submitted has been removed due to company sensitive information involved.

Appendix reference: Appendix 7

3. Please list your inputs for like goods. Indicate the source of your inputs and whether they are imported or domestically sourced.

Not provided

Appendix reference:

4. If your company is vertically integrated or some of the inputs (e.g. raw materials, energy) used in the production of your like goods are produced by an associated party, provide details of this arrangement and attach documentation demonstrating any agreements you have.

Not applicable.



Appendix reference:

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

Not provided

Appendix reference:

6. 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.

Not provided

Appendix reference:

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

Not provided

Appendix reference:

C2 Cost reconciliation

1. In **Annex 5 – Sales and cost reconciliation**, please fill in the yellow cells. Insert additional columns or rows as required.
- Please give the total cost of goods made and sold as shown on your audited financial statement of the most recent accounting period.
 - If the POI and your accounting period are different, please enter the difference in cost of goods sold between the periods.
 - Please provide your company's total cost of goods sold over the period, as shown on your management accounts.



- Please give the change in finished goods inventory over the period. This usually relates to the difference between the cost of goods sold and cost of production.
- Please provide the company's total cost of production over the period as shown on your management accounts.
- You may manufacture other products that are not under consideration. Please provide the cost of production and the production quantity of the other products that are not under consideration over the period. Please provide the names of each product group that you have determined to be not the goods. Please add more rows if required.
- For the cells under 'Cost of production for the goods under review', please enter the total cost of production and production quantity.
- Sales forecasts for 2021 and 2022.

C3 Production process

1. Please provide a written summary and a diagram/flow chart of your production process for the like goods that you produce in the UK.

Not provided

Appendix reference:

2. Identify what parts of your production process take place in the UK and explain at what stage the most value is added to your like goods in the production process. Please describe the manufacturing process of the like goods, its level of complexity and the investment of capital involved.

Information provided in line with the above description has been removed from the non-confidential version as may be company sensitive.

Appendix reference:

3. Please provide the physical addresses (including town/city and county) of all your company's UK sites/facilities involved in the production of the like goods.

Company name	Legal address
Provided but removed from the non-confidential version	

Appendix reference:

+Add additional rows as required



C4 Joint products and by-products

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

Not provided

Appendix reference:

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.

Not provided

Appendix reference:

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.

Answer provided removed from the non-confidential version

Appendix reference:

C5 Raw material (RM) and input purchases

Please complete **Annex 6 – Raw materials and inputs**, detailing the principal purchases used in the production of the like goods during the POI by your company.

- Please provide a complete breakdown for any inputs that account for more than 1% of the cost of production of your like goods. Please include all purchases of these materials used or purchased during the POI.
- For each reported purchase transaction, describe the direct raw material and its characteristics (e.g. grade, purity).
- If your energy costs constitute more than 5% of your production costs, please also include energy purchases in the annex.
- All figures should be reported net of tax.



Please provide an invoice and any supporting documents for two of your purchases stated within **Annex 6 – Raw materials and inputs**. Use the box below to give an overview of any supporting documents provided.

Answer provided removed from the non-confidential version

Appendix reference:

C6 Sales

1. Please complete **Annex 7 – Transaction by transaction (T by T) domestic sales**

- These should include all your domestic sales and returns of the like goods for the period of investigation. Include the like goods you have produced and/or like goods that you have purchased and resold.
- Please report returns as negative (-) sales figures.
- Please ensure that you correctly categorise each sale by PCN.
- For transactions or invoices that consist of multiple PCNs, the same invoice number should be referenced. All information in a row should refer to the individual PCN displayed in the first column of that row.
- Where a date of sale falls outside of the period of investigation, but the invoice date falls within it, both dates should be provided for the relevant domestic sale transaction.
- All figures should be reported net of tax.

Please contact the Case Team if you can't provide the relevant information in sufficient detail.

2. Please complete **Annex 8 – Export sales**.

- These should include all your export sales of like goods for the period of investigation 1 January 2019 to 31 December 2019.
- Please ensure that you correctly report your total volume and total value for your export sales per PCN.
- All figures should be reported net of tax.

3. Please provide a list of associated customers for like goods. Explain the nature of the association and any effect it has on the terms of sale to that customer.

Answer provided removed from the non-confidential version

Appendix reference:

4. Attach copies of distributor or agency agreements that you have relating to the sale of like goods.



Answer provided removed from the non-confidential version

Appendix reference:

5. Provide copies of price lists for the like goods for the period of investigation (POI).

Answer provided removed from the non-confidential version

Appendix reference:

6. If any price reductions have been applied to any of your sales of like goods over the POI, please provide a description. This includes discounts, rebates, credit terms, allowances and commissions.
- Explain the terms and conditions that must be met for any price reduction.
 - Indicate any price reduction not included in an invoice price. Explain how the invoice price and the price reduction have been calculated.
 - If you have issued any credit notes that are not reflected in invoice prices, provide details of the criteria for issuing such notes and the impact that they have on prices (both past and future).

Answer provided removed from the non-confidential version

Appendix reference:

7. Please provide details of your distribution network for like goods, if you have one. Do your sales usually include delivery? How do you calculate delivery costs and prices? Does this vary between customers?

Answer provided removed from the non-confidential version

Appendix reference:

8. Attach sales contracts for the top five customers by volume in **Annex 7 – T by T domestic sales** that you have sold like goods to in the period of investigation.

Answer provided removed from the non-confidential version

Appendix reference:



9. Select examples of domestic sales of like goods to two different customers included in **Annex 7 – T by T domestic sales**. Attach as an appendix a complete set of documentation for these sales. Where possible, include purchase orders, commercial invoices, order acceptances, discounts or rebates, credit and debit notes, contracts of sale, freight and insurance details, bank documentation and all other relevant documents.

Not provided

Appendix reference:

C7 Captive use

1. Complete **Annex 9 – Captive use**. This should include transaction-by-transaction information for the POI detailing your company's individual transfers of the finished like good for internal or captive use. You will need to use the PCN table at page 2 above to categorise each of these transfers by PCN. In the destination column, indicate any transfers for captive use that have not remained on your manufacturing site. In the "use" column, specify how the like goods were used and in the "value" column please assign a market value to the like goods transferred.
2. Please comment on whether your captive use of the like good would be affected if the existing anti-dumping measure on the goods subject to review were to no longer apply? Please attach evidence to support your answer where possible.

Answer provided removed from the non-confidential version

Appendix reference:

C8 Purchases of like goods

1. Complete **Annex 10 – Purchases of like goods**. This should include information relating to your company's total annual purchases of already finished like goods over the period, 1 January 2016 to 31 December 2019. All figures should be reported net of tax.
2. Describe how these purchases fit into your business model. Please attach copies of any agreements or contracts that you have relating to your purchases of like goods.



Answer provided removed from the non-confidential version

Appendix reference:



SECTION D: Injury to your business

We are interested in this section of the questionnaire to differentiate between factors that may affect wire and stand separately and have given you the opportunity to answer each question for each product type.

For more information on how we assess injury and for the definition of injury, please follow the link: <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/how-we-assess-injury>

1. Is your business suffering from injury? If so, please describe the nature and degree of the injury. This can relate to the prices, volumes or profits associated with your production and sale of the like goods, or to wider aspects of your business.

Please specify and substantiate your claims with evidence.

Answer provided removed from the non-confidential version.

Appendix reference: Appendix 8 & Appendix 9

PC Strand is no longer produced by our company in the UK.

Appendix reference:

2. a) Would your business suffer from injury if the existing anti-dumping measure on the goods subject to review were to no longer apply? b) If your business is already suffering injury, would the nature or source of the injury change if the measures were to no longer apply? If so, please describe the nature and degree of the injury, and provide supporting evidence.

Answer provided removed from the non-confidential version

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:



3. Please provide details if your cost of production of the like goods has changed significantly in the period, 1 January 2016 to 31 December 2019. If so, please explain the cause(s) and, where possible, substantiate with evidence.

Answer provided removed from the non-confidential version

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

4. How would your cost of production change in future years if the existing anti-dumping measure on the goods subject to review were to no longer apply? Please describe the nature and degree of the change and provide supporting evidence. If possible, please provide annual cost of production estimates (e.g. projections or forecasts) for future years and use the text box below to explain the methods used to calculate these estimates.

Answer provided removed from the non-confidential version

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

5. Please complete **Annex 11 – Injury**. This should be completed in reference to your UK production of the like goods for the period, 1 January 2016 to 31 December 2019. For the following injury factors listed in the annex, please explain:

- How you calculated and apportioned your average net operating profit after tax (NOPAT) for the like goods;
- How you calculated and apportioned your interest expense incurred for the like goods;
- How you estimated your percentage of market share for the like goods;
- How you calculated your capacity and capacity utilisation for the like goods, and the cause of any significant variations;
- How you set your wages, and the causes of any significant variations; and,



- How your total employees involved in the UK manufacture of like goods are split across different sites.

Not provided

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

6. Please explain whether any of the indicators listed in **Annex 11 – Injury** would be affected if the existing anti-dumping measure on the goods subject to review were to no longer apply. Please substantiate your claims with evidence. Where possible, please add additional rows in **Annex – 11 Injury** to provide estimates for future years (e.g. projections of forecasts). Please use the text box below to explain the methods used to calculate your estimates.

Answer provided removed from the non-confidential version

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

7. For your like goods only, please state what level of profit, before tax and as a percentage of turnover, your company would usually expect to achieve (i.e. if there was no injury to your business) and explain how you arrived at this figure.

Not provided

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

8. Would your level of profit, before tax, as a percentage of turnover for the like goods be affected 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.



Not provided

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

9. Explain how you set your current sales price for your like goods. Is this the same as your target sales price? If not, please explain the reasons for this.

Answer provided removed from the non-confidential version

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

10. Would your sales price for your like goods be affected 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.

Answer provided removed from the non-confidential version

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

11. Complete **Annex 12 – Investments**.

- Please note that in the first table you should include information relating to all company-wide investments, which includes investments that relate to the like goods.
- The second table in the annex is for investments that relate to like goods only.
- For both tables, the first column should show aggregate investment totals per year.
- Under each category of investment in the annex, explain what the investment is for and indicate the amount of investment apportioned.



Where necessary, add additional rows in **Annex – 12 Investments** to provide estimates (e.g. projections or forecasts) for future years assuming the measure is retained.

12. Please provide details of your typical source(s) of finance (e.g. loans, debt, share issues, bond issues etc.) for each category of investment relating to your company-wide investments.

Answer provided removed from the non-confidential version

Appendix reference:

13. Please explain what has affected your company's level and trends of returns on investment, ability to make investments and/or ability to raise capital in the period, 1 January 2016 to 31 December 2019. Please describe the nature and cause of this change and substantiate with supporting evidence e.g. funding proposals, loan approvals or other relevant financial documents.

Answer provided removed from the non-confidential version

Appendix reference:

14. Please explain whether your company's ability to make investments and/or ability to raise capital would be affected in future years if the existing anti-dumping measure on the goods subject to review were to no longer apply. Please substantiate your claims with evidence and if you have provided estimates explain how you calculated them.

Answer provided removed from the non-confidential version

Appendix reference:

15. Explain any variances between your actual and forecasted budgets over the past period, 1 January 2016 to 31 December 2019, with reference to your cash flow statements.

Not provided

Appendix reference:

16. Would your actual and forecasted budgets be affected 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.

Not provided



Appendix reference:

17. Please complete **Annex 13 – Forward contracts**. Describe and attach copies of all forward contracts/ongoing supply agreements for like goods. Comment on these forward contracts. Are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward contracts over time? If so, what has caused this variation?

N/A
Appendix reference:

PC Strand is no longer produced by our company in the UK.
Appendix reference:

18. Would your forward contracts be affected 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.

N/A
Appendix reference:

PC Strand is no longer produced by our company in the UK.
Appendix reference:

19. If your business is suffering from injury, please explain and indicate the degree to which this has been caused by the alleged dumping of the goods concerned. Please also explain and indicate the degree to which any other factors might have caused the injury, 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. Please substantiate your claim(s) with evidence.

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.



Answer provided removed from the non-confidential version

Appendix reference:
Appendix 8 & Appendix 9

PC Strand is no longer produced by our company in the UK.

Appendix reference:

20. Is your business under threat of injury? If so, please describe the threat, its cause and how the injury is clearly foreseen and imminent. Would injury be likely to reoccur if the existing anti-dumping measure on the goods subject to review were to no longer apply? Please describe the nature and immanency of any threat and substantiate your claims with evidence.

Answer provided removed from the non-confidential version

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

21. Is your industry suffering material retardation (definition can be found in the link at the beginning of this section), either as a whole or with regard to certain products? If so, please describe the products affected and the factors causing the retardation. Please substantiate your claims with evidence.

Answer provided removed from the non-confidential version

Appendix reference:

22. Would there be any indirect effects on your industry and/or business if the existing anti-dumping measure on the goods subject to review were to no longer apply? Please substantiate your claims with evidence.

Not provided

Appendix reference:



SECTION E: Dumping

E1 Dumping

1. Do you have any information about the normal value of the goods subject to review in the People's Republic of China? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes, market intelligence or sales correspondence, or any other documentation relating to the domestic price of the goods concerned.

Answer provided removed from the non-confidential version

Appendix reference:

2. Do you have any information about the export price to the UK of the goods subject to review from the People's Republic of China? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes or sales correspondence, or any other relevant documentation relating to the export price to the UK of the goods concerned.

Answer provided removed from the non-confidential version

Appendix reference:

E2 Adjustments

1. If you are aware of any factors that could mean costs or profits of the goods subject to review are not substantially determined by market forces, please provide details and any supporting evidence.

Answer provided removed from the non-confidential version

Appendix reference:

E3 Particular market situation



1. Are you aware of any distortions in the People's Republic of China (PRC) related to any of the raw materials or other inputs used in the production of the goods subject to review or like goods?

Please, be specific, describe such distortions in detail and provide evidence.

Answer provided removed from the non-confidential version

Appendix reference:

2. If you are aware of distortions in the market for raw materials or other inputs in the production of the good subject to review, do you think that the distortions are likely to represent a significant cost of production of the goods subject to review or like goods?

Please be specific and detailed in your response, providing evidence to support your claims.

Answer provided removed from the non-confidential version

Appendix reference:

3. In your opinion, were the prices of raw materials or other inputs in the production of the good concerned, by the distortions during the POI. Please be specific and detailed in your response, providing evidence to support your claims.

Answer provided removed from the non-confidential version

Appendix reference:

4. What do you believe, would be representative international markets for any raw material or other input affected by a distortion? Provide prices of such raw material or other input in these markets for the period of investigation.

Please provide a specific, detailed explanation of your choice, supported by evidence.

Answer provided removed from the non-confidential version

Appendix reference:



5. If you believe that there are any market distortions in the People's Republic of China, please provide any other information, which you think would be useful to help our investigation in assessing these market distortions, including but not limited to:
- situations/distortions in the domestic market of the PRC 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.

Answer provided removed from the non-confidential version

Appendix reference:

SECTION F: Economic interest

The economic interest test helps TRID assess the economic impact of a measure compared to what would happen if it were to no longer apply. There are six factors which TRID must consider as part of the economic interest test:

- i) The injury caused by the dumped goods to UK industry and the benefits to that industry in removing the injury.
- ii) The economic significance of affected industries and consumers in the UK.
- iii) The likely impact on affected industries and consumers in the UK.
- iv) The likely impact on particular geographic areas, or particular groups, in the UK.
- v) The likely consequences for the competitive environment and for the structure of markets for goods in the UK.
- vi) Other matters that TRID consider relevant.

The questions in this section will contribute to this assessment. For questions in this section please provide information broken down by each of your company's UK sites/facilities, where relevant and possible.

1. Please provide the names, legal addresses and telephone numbers of all known domestic companies that produce the like goods or that are involved in the importation, distribution or sale of the goods subject to review.



Answer provided removed from the non-confidential version

Appendix reference:

2. Please provide an overview of your supply chain for the like goods, from raw materials through to final customers. Where possible, please describe the number, location and size of UK producers at each stage.

Answer provided removed from the non-confidential version

Appendix reference:

3. Where possible, please provide a breakdown by location for the employment figures provided in Annex 11 - Injury. Would these employment figures be affected if the existing anti-dumping measure were to no longer apply?

Please substantiate your claims with evidence. Where possible, please provide estimates (e.g. projections or forecasts) for future years and explain the method used to calculate them.

. Answer provided removed from the non-confidential version

Appendix reference:

4. Where possible, please provide a breakdown by location for the wages provided in Annex 11 - Injury. If you are unable to provide median wages, please provide mean wages. Would these wages be affected if the existing anti-dumping measure on the goods subject to review were to no longer apply? Please substantiate your claims with evidence. Where possible, please provide estimates for future years (e.g. projections or forecasts) and explain the method used to calculate them.

Not provided

Appendix reference:

5. If known, what fraction of domestic demand for the goods subject to review (by volume) does your company supply? Would your market share be affected if the existing anti-dumping measure were to no longer apply? Please substantiate your claims with evidence. Where possible, please provide estimates (e.g. projections or forecasts) for future years and explain the method used to calculate them.

Answer provided removed from the non-confidential version

Appendix reference:

PC Strand is no longer produced by our company in the UK.



Appendix reference:

6. Please comment on how significant production of the like goods is in relation to your company's entire UK production. Within your response, please state the share of total production value represented by the like goods during 01 January 2019 to 31 December 2019.

Answer provided removed from the non-confidential version

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

7. What share of total sales of the like goods do exports represent, by value for your company? Please provide figures for the period 01 January 2019 to 31 December 2019 if possible.

Answer provided removed from the non-confidential version

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

8. Who consumes the like goods? Do you regard the like goods to be an intermediate and/or final good? Who buys the like goods: other companies or individual consumers?

Answer provided removed from the non-confidential version

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

9. Please comment on how any other industries, markets or products would be affected if the existing anti-dumping measure on the goods subject to review were to no longer apply? Please consider in particular:



- upstream industries – those who produce inputs needed for the like goods or goods subject to review
- downstream industries – those who purchase the like goods or goods subject to review

Answer provided removed from the non-confidential version

Appendix reference:

PC Strand is no longer produced by our company in the UK.

Appendix reference:

10. Please describe how you would expect the following to be affected if the existing anti-dumping measure on the goods subject to review were to no longer apply:

- market price of the like goods in the UK;
- total UK output of the like goods;
- total imports of the goods subject to review to the UK; and
- total exports from the UK.

Where possible, please provide estimates for future years (e.g. projections or forecasts) to support your claims.

Answer provided removed from the non-confidential version

Appendix reference: Appendix 10

PC Strand is no longer produced by our company in the UK.

Appendix reference:

11. To what extent would you expect any increase in prices for the goods subject to review to be passed onto final consumers?

Answer provided removed from the non-confidential version

Appendix reference:



12. Would plans for future UK investment or expansion be affected if the existing anti-dumping measure were to no longer apply? If so, please provide detail, including the location, with supporting evidence.

Answer provided removed from the non-confidential version

Appendix reference:

PC Strand is no longer produced by our company in the UK .

Appendix reference:

13. The *Equality Act 2010* protects the characteristics listed below. Do you have any evidence to suggest that any of these groups could be disproportionately affected by the continuation of an anti-dumping measure? Please provide evidence to support your answer.

- age,
- disability,
- gender reassignment,
- marriage or civil partnership,
- pregnancy and maternity,
- race,
- religion or belief,
- sex, and
- sexual orientation

Not provided

Appendix reference:

14. In terms of the competitive environment and structure of markets for goods in the UK, please comment on the following in relation to how the continuation of a trade remedy measure could impact:

- the range of suppliers of PSC wire and strand,
- the ability of suppliers of PSC wire and strand to compete,
- the incentives for suppliers of PSC wire and strand to compete vigorously,
- the choices and information available to consumers

Please provide evidence to support your answer.

Answer provided removed from the non-confidential version

Appendix reference:



PC Strand is no longer produced by our company in the UK.

Appendix reference:

15. Please describe the nature and degree of any regional impacts that you would expect if the existing anti-dumping measure on the goods subject to review were to no longer apply.

Answer provided removed from the non-confidential version

Appendix reference:

16. If there are any additional economic factors that you consider to be relevant for the economic interest test in this review, please provide details here and any supporting evidence.

None known

Appendix reference:



SECTION G: 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, spreadsheet annex 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 F of this questionnaire may help ensure your submission is complete.

A confidential and non-confidential version of the questionnaire and the spreadsheet annexes 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.



Declaration

By signing this declaration, you agree that all information supplied in this questionnaire 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:

21st December 2020

Date


Signature of authorised official

Company Stamp (if possible)

Gareth Cook Finance Director EMEIA

Name and title of authorised official



SECTION H: 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 – About your goods	✓
Section C – Costs, production and sales	✓
Section D – Injury to your business	✓
Section E – Dumping	
Section F – Economic interest	✓
Section G – Next steps and declaration	✓

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	Document title
Appendix 1	Structure Chart (redacted)
Appendix 2	Articles of association (redacted)
Appendix 3	Certificate of Good Legall Standing (redacted)
Appendix 4	Bridon Construction Products Catalogue
Appendix 5	2016 – 2019 Statutory Accounts (withheld from non-confidential version as confidential)
Appendix 6	2019 Consolidated Bekaert accounts (withheld from non-confidential version as confidential)
Appendix 7	Basic Production Model (withheld from non-confidential version as confidential)
Appendix 8	Not for public viewing
Appendix 9	Not for public viewing
Appendix 10	Not for public viewing

+Add additional rows as required