



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:	<i>Silvery Dragon Prestressed Materials Co.,ltd</i> <i>Tianjin</i>

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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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.

Please comment here



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:	Silvery Dragon Prestressed Materials Co.,LTD Tianjin
Legal structure (e.g. Representative Office, Sales Office, Sino-Foreign Joint Venture etc):	Joint-stock Limited Company
Year of establishment:	March 17, 1998
Other operating names:	N/A
Name (point of contact):	[REDACTED]
Position:	[REDACTED]
Address:	No. 62 Shuangjiang Road, Shuangyuan Industrial Zone, Beichen District, Tianjin
Telephone No:	[confidential]
Email:	[REDACTED]
Website:	http://www.yinlong.com

Legal name of company:	Silvery Dragon Prestressed Materials Co.,LTD Tianjin,Hejian Branch
Legal structure (e.g. Representative Office, Sales Office, Sino-Foreign Joint Venture etc):	Branch
Year of establishment:	September 25, 2010
Other operating names:	N/A
Name (point of contact):	[REDACTED]
Position:	[REDACTED]
Address:	West Side of Beishicao Township Government, Hejian City
Telephone No:	[confidential]
Email:	[REDACTED]
Website:	N/A



Legal name of company:	Baozelong Metal Material Co., Ltd Hejian
Legal structure (e.g. Representative Office, Sales Office, Sino-Foreign Joint Venture etc):	Limited liability Company
Year of establishment:	February 28, 2012
Other operating names:	N/A
Name (point of contact):	[REDACTED]
Position:	[REDACTED]
Address:	Economic and Technological Development Zone, Hejian, China
Telephone No:	[confidential]
Email:	[REDACTED]
Website:	N/A

Legal name of company:	Silvery Dragon Prestressed Materials Co.,LTD Xinjiang
Legal structure (e.g. Representative Office, Sales Office, Sino-Foreign Joint Venture etc):	Limited liability Company
Year of establishment:	November 03, 2015
Other operating names:	N/A
Name (point of contact):	[REDACTED]
Position:	[REDACTED]
Address:	No.1 Workshop, No.42 Jinshi Road, Toutunhe District, Urumqi, Xinjiang,China
Telephone No:	[confidential] [REDACTED]
Email:	[REDACTED]
Website:	N/A

Legal name of company:	Silvery Dragon Prestressed Materials Co.,Ltd Benxi
Legal structure (e.g. Representative Office, Sales Office, Sino-Foreign Joint Venture etc):	Limited liability Company
Year of establishment:	November 03, 2015
Other operating names:	N/A



Name (point of contact):	[REDACTED]
Position:	[REDACTED]
Address:	Jinja Village, Qiaotou Town, Pingshan District, Benxi City, China
Telephone No:	[confidential]
Email:	[REDACTED]
Website:	N/A

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:	Dentons Europe LLP
Address:	Rue de la Régence 58, 1000 Brussels Belgium
Telephone No.:	[REDACTED]
Email:	[REDACTED] [REDACTED] [REDACTED]
Confirm they have signed authority to act (Yes/No):	YES
Appendix reference:	

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.

Answer:

Silvery Dragon Prestressed Materials Co., Ltd Tianjin (hereinafter referred to as "Silvery Dragon" or "the company") is a producer of the goods subject to review, which exports by itself or exports through its subsidiary Tianjin Silvery Dragon Group Tech.& Trade Co., Ltd (hereinafter referred to as "Tech.&Trade").

And there are four additional subsidiaries or associated companies of Silvery Dragon which produce the subject goods. Name of these companies are listed as below:

No.	Company Name	Association
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1	Hejian Branch of Silvery Dragon Prestressed Materials Co., Ltd Tianjin (hereinafter referred to as "Hejian Branch")	Branch of Silvery Dragon
2	Xinjiang Silvery Dragon Prestressed Materials Co., Ltd. (hereinafter referred to as "Xinjiang Silvery")	Subsidiary of Silvery Dragon
3	Hejian Baozelong Metal Material Co., Ltd.(hereinafter referred to as "Hejian Baozelong")	Subsidiary of Silvery Dragon
4	Benxi Silvery Dragon Prestressed Materials Co., Ltd.(hereinafter referred to as "Benxi Silvery")	Subsidiary of Silvery Dragon
With regard to contact information of above subsidiaries and associated companies of Silvery Dragon, please kindly refer to the response in A1 .		
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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not experience any changes in the legal form, i.e. mergers, acquisition, etc., during the past 5 years.

Date	Legal form	Explanation of change
N/A	N/A	N/A
N/A	N/A	N/A
N/A	N/A	N/A

+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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:



Not applicable. The company does not need to obtain any authorisation other than the business license to produce and sell the goods subject to review in the country of origin or to export. And the company is not subject to any direct or indirect quantitative or other restrictions on any of these activities.

Appendix reference: [N/A](#)

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

Answer:

Silvery Dragon:

Silvery Dragon is a member of China Steel Construction Society.

Silvery Dragon provides a copy of member certification in [Appendix 1 – Member Certification](#).

Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company is not any members of any representative organisations.

Appendix reference: [Appendix 1](#)

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.

Answer:

Silvery Dragon, Hejian Branch:

Silvery Dragon and Hejian Branch provide their internal organization structure in [Appendix 2 – Internal organization diagram](#).



Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Internal organization of Benxi Silvery, Xinjiang Silvery and Hejian Baozelong are the same as the Silvery Dragon, please see internal organization of Silvery Dragon in Appendix 2.

Appendix reference: [Appendix 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.

Answer:

Silvery Dragon, Hejian Branch, Xinjiang Silvery, Benxi Silvery and Hejian Baozelong:

Please kindly refer to A3 – Organisational structure.

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.



Answer:

Silvery Dragon, Hejian Branch, Xinjiang Silvery, Benxi Silvery and Hejian Baozelong:

Please kindly refer to A4 – Owners and shareholders.

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

Answer:

Silvery Dragon:

According to the Article 96 of the Articles of Association of Silvery Dragon, Members of the Board of Directors are appointed or revised by general meetings of shareholders, and term of the appointment is three years.

Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable. Hejian Baozelong, Xinjiang Silvery and Benxi Silvery have no board of directors.

Hejian Branch:

Hejian Brach is a branch of Silvery Dragon, which does not have board of 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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Please kindly refer to [Appendix 3 – Business documents](#) for documents required by Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery.

The company annually submits the Business License via the enterprise credit information publicity system to Authorities for annual review. Authorities will evaluate the Business License of each company online and no longer issue any certification of yearly evaluation, so the yearly evaluation of the business license of the company is not applicable. Website of enterprise credit information publicity system is: <http://www.gsxt.gov.cn/index.html>.

As Hejian Branch is only a branch of Silvery Dragon, except for business license, there is no requirement on other document.

Hejian Baozelong, Xinjiang Silvery and Benxi Silvery have no shareholder's meeting, board of directors meeting or board of supervisors meeting, so minutes of shareholder's meeting, board of directors meeting and board of supervisors meeting for those companies are not applicable.

Appendix reference: [Appendix 3](#)

A5 Operational links with other companies or persons

1. 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
N/A	N/A
N/A	N/A
N/A	N/A
Appendix reference: N/A	

+Add additional rows as required.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company did not establish 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.

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.

Company Name	Records address	What records are held?
Silvery Dragon	No. 62 Shuangjiang Road, Shuangyuan Industrial Zone, Beichen District, Tianjin, China	All of the company's accounting records
Hejian Branch	West Side of Beishicao Township Government, Hejian City, China	All of the company's accounting records
Hejian Baozelong	Hejian Economic and Technological Development Zone, Hejian City, China	All of the company's accounting records
Xinjiang Silvery	No.1 Workshop, No.42 Jinshi Road, Toutunhe District, Urumqi, Xinjiang, China	All of the company's accounting records
Benxi Silvery	Jinjia Village, Qiaotou Town, Pingshan District, Benxi City, China	All of the company's accounting records

+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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Financial year of the company is from 1 January to 31 December of each calendar year, which has not changed during the last four financial years.

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.

Answer:

Silvery Dragon, Hejian Baozelong, and Benxi Silvery:

The company provides the audit reports in [Appendix 4 - Audit reports \(2018 and 2019\)](#).

Appendix reference: [Appendix 4](#)

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

Answer:

Hejian Branch, Xinjiang Silvery:

The company provides the financial statements for the period 01 January 2016 – 31 December 2019 in [Appendix 5 – Financial statements](#).

Appendix reference: [Appendix 5](#)

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company has provided the Trial balance required under this question in [Appendix 6 – Financial documents](#).

Management accounts are not applicable since the company has no management accounts.

Appendix reference: [Appendix 6](#)

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable. The company did not prepare such statements or reports.

Appendix reference: [N/A](#)

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.

Answer:

Not applicable. The company's accounts are not consolidated at the company group level.

Appendix reference: [N/A](#)



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)

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company has provided its chart of accounts in [Appendix 7 – Chart of Accounts](#).

Appendix reference: [Appendix 7](#)

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).

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company uses [confidential] as its financial 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 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, 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.

Answer:

Silvery Dragon, Hejian Branch, Xinjiang Silvery:

1. The company adopts the accruals basis of accounting.

2. The company achieves the sales revenue in light of the following principles:

- (1) The significant risks and rewards of ownership of the goods have been transferred to the buyer by the Company;
- (2) The company retains neither continuous management right that keeps relation with the ownership nor effective control over the sold goods;
- (3) The amount of revenue can be measured in a reliable way;
- (4) The relevant economic benefits are likely to flow into the Company;
- (5) The revenue from selling goods shall be recognized when the relevant costs incurred or to be incurred can be measured in a reliable way.

3. Inventories are valued by the weighted average method at the time of delivery.

4. The company's depreciation method and average useful life of fixed assets are listed as below:

Item	Depreciation method	Average useful life
House and building	Average useful life	20-35
Machine, equipment	Average useful life	5-10
Transport equipment	Average useful life	4-10
Electronic and other equipment	Average useful life	3-5



5. Provisions for bad or doubtful debts

For receivables with obvious single risk characteristics, the possible losses are expected according to the similar credit risk characteristics of receivables, the historical amount loss and the debtor's economic situation; the expected credit losses are calculated at exposure at default (EAD) and expected credit loss rate for the entire duration.

If there is no sufficient evidence to assess expected credit losses with reasonable cost at a single instrument level, the Company will, based on its experience from historical credit losses, the current situation and the judgment of the future economic situation, divide notes receivable into several combinations according to credit risk characteristics and calculate expected credit losses on the basis of the combinations. The combinations are determined as follows:

- (1) Calculate the bad-debt provision based on historical credit loss experience, current situation and expectation about future economic conditions;
- (2) Calculate the expected credit losses according to the aging of accounts and the expected credit loss rate of the whole duration.

6. The company adopts category costing method, production cost will be allocated based on the production of different products.

7. Scraps will be sold by the company and recorded into other business revenue.

Hejian Baozelong:

1. The company adopts the accruals basis of accounting.

2. The company achieves the sales revenue in light of the following principles:

- (1) The significant risks and rewards of ownership of the goods have been transferred to the buyer by the Company;
- (2) The company retains neither continuous management right that keeps relation with the ownership nor effective control over the sold goods;
- (3) The amount of revenue can be measured in a reliable way;
- (4) The relevant economic benefits are likely to flow into the Company;
- (5) The revenue from selling goods shall be recognized when the relevant costs incurred or to be incurred can be measured in a reliable way.

3. Inventory valuation methods for the company is weighted average method.

4. The company's depreciation method and average useful life of fixed assets are listed as below:

Item	Depreciation method	Average useful life
House and building	Average useful life	20-35



Machine, equipment	Average useful life	5-10
Transport equipment	Average useful life	4-10
Electronic and other equipment	Average useful life	3-5

5. Provisions for bad or doubtful debts

For receivables with obvious single risk characteristics, the possible losses are expected according to the similar credit risk characteristics of receivables, the historical amount loss and the debtor's economic situation; the expected credit losses are calculated at exposure at default (EAD) and expected credit loss rate for the entire duration.

If there is no sufficient evidence to assess expected credit losses with reasonable cost at a single instrument level, the Company will, based on its experience from historical credit losses, the current situation and the judgment of the future economic situation, divide notes receivable into several combinations according to credit risk characteristics and calculate expected credit losses on the basis of the combinations. The combinations are determined as follows:

- (1) Calculate the bad-debt provision based on historical credit loss experience, current situation and expectation about future economic conditions;
- (2) Calculate the expected credit losses according to the aging of accounts and the expected credit loss rate of the whole duration.

6. The company adopts category costing method, production cost will be allocated based on the production of different products.

7. Scraps will be sold by the company and recorded into other business revenue.

Benxi Silvery:

1. The company adopts the accruals basis of accounting.

2. The company achieves the sales revenue in light of the following principles to:

- (1) The significant risks and rewards of ownership of the goods have been transferred to the buyer by the Company;
- (2) The company retains neither continuous management right that keeps relation with the ownership nor effective control over the sold goods;
- (3) The amount of revenue can be measured in a reliable way;
- (4) The relevant economic benefits are likely to flow into the Company;
- (5) The revenue from selling goods shall be recognized when the relevant costs incurred or to be incurred can be measured in a reliable way.

3. Inventories are valued by the weighted average method at the time of delivery.



4. The company's depreciation method and average useful life of fixed assets are listed as below:

Item	Depreciation method	Average useful life
House and building	Average useful life	20-35
Machine, equipment	Average useful life	5-10
Transport equipment	Average useful life	4-10

5. Provisions for bad or doubtful debts

For receivables with obvious single risk characteristics, the possible losses are expected according to the similar credit risk characteristics of receivables, the historical amount loss and the debtor's economic situation; the expected credit losses are calculated at exposure at default (EAD) and expected credit loss rate for the entire duration.

If there is no sufficient evidence to assess expected credit losses with reasonable cost at a single instrument level, the Company will, based on its experience from historical credit losses, the current situation and the judgment of the future economic situation, divide notes receivable into several combinations according to credit risk characteristics and calculate expected credit losses on the basis of the combinations. The combinations are determined as follows:

- (1) Calculate the bad-debt provision based on historical credit loss experience, current situation and expectation about future economic conditions;
- (2) Calculate the expected credit losses according to the aging of accounts and the expected credit loss rate of the whole duration.

6. The company adopts category costing method, production cost will be allocated based on the production of different products.

7. Scraps will be sold by the company and recorded into other business revenue.

Appendix reference: N/A

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

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company did not change its accounting methods during POI.

Appendix reference: N/A



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](#).

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery, Benxi Silvery:

The company has no internal codes, and adopts product name and diameter as their product codes.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company did not export (or export through Tech &Trade) the goods subject to review to the UK during the POI. In order to fully cooperate with authority's investigation, we provide the documents to illustrate the technical and physical characteristics of the goods sold by the company for authority's information. Please see [Appendix 8 - product description](#).

Appendix reference: [Appendix 8](#)



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.**

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company did not export any other goods in the UK during the POI. A7.2 – Other goods, Annex II is not applicable.

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?

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

As stated above, the company did not export (or export through Tech & Trade) the goods subject to review to the UK during the POI.

In order to fully cooperate with this investigation, we provide the follow information for authority's information:

1. Goods subject to review belongs to the category of industrial product, which has no much difference between countries about the technical and physical characteristic. And the company will produce according to the client's requirements if the specific technological standard was required.

2. There is no difference between the products made and sold by the company for Export and domestic sales. .

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

First of all, the company's sales price for the goods subject to review is higher than other Chinese producers', both in the domestic and export markets, and is not lower than the sales price of the producers in the UK.

Secondly, the company cannot lower its sales price for the goods subject to review because it sets sales price based on the cost.

Thirdly, if the existing anti-dumping measure on the goods subject to review is no longer applied, the company may receive some orders from the UK customer, However this will not affect the sales volume of the company because it depends on the capacity of the company, and the company has no plans to increase its capacity. Future sales volume and value of the company would not be affected if the existing anti-dumping measure on the goods subject to review is no longer applied.

Appendix reference: N/A



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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

EU have imposed anti-dumping measures on the Chinese PSC Wires and Strands since May 2009 till now. This investigation is at the stage of the second sunset review.

A web link to the findings published by the EU: <https://eur-lex.europa.eu/oj/direct-access.html>.

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**.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company did not have sales that are made between associated companies for further processing, transformation, or assembly, subsection **B2 – Captive sales** is not applicable.

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).

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not export the subject goods to the UK during the POI.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not export the subject goods to the UK during the POI.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not export the subject goods to the UK during the POI.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not export the subject goods to the UK during the POI.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not export the subject goods to the UK during the POI.

Appendix reference: [N/A](#)

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

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not export the subject goods to the UK during the POI.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not export the subject goods to the UK during the POI.

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?

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

If the existing measure is no longer applied, the Company will restart sales to the UK.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not export the subject goods to the UK during the POI.

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**.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not export the subject goods to the UK during the POI.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not export the subject goods to the UK during the POI.

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?

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not export the subject goods to the UK during the POI.

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).

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable. The company did not category the customer and treated all customers as purchaser.

Appendix reference: [N/A](#)



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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The customer send specifications, quantity and other requirements of the product and ask for the company's quotation. Then, the company quotes base on the customer's order and the customer may then bargain with the company. Once both parties agree on the price, the customer sends purchase order to the company for confirmation.

Appendix reference: [N/A](#)

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Production of the company begins after the customers establish their order and the sale has been made.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the price is agreed per order.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Sales prices of the company are set per order based on the cost and the negotiation results with the client.

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?

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

First of all, the company's sales price for the goods subject to review is higher than other Chinese producers' on both domestic and export markets, and which is not lower than the sales price of the producers in the UK.

Secondly, the company cannot lower its sales price for the goods subject to review because it sets sales price based on the cost.

Thirdly, if the existing anti-dumping measure on the goods subject to review is no longer applied, the company may receive some orders from the UK customers, but this will not be affect the sales volume of the company because it depend on the capacity of the company, and the company has no plans to increase its capacity.

Therefore, future sales volume and value of the company will not be affected if the existing anti-dumping measure on the goods subject to review is no longer applied.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Please kindly refer [Appendix 9 – Domestic sales documents](#).

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Please kindly refer to [Appendix 10 – Exchange rate \(2018-2019\)](#) for the central bank exchange rates in China for the past two years.

Appendix reference: [Appendix 10](#)

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company adopts the central bank exchange rate as its actual exchange rate.

Appendix reference: [N/A](#)

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

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable, since there is no sale of foreign currency on forward markets directly linked to the company's export sales.

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?

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Benxi Silvery and Xinjiang Silvery:

Within the Group, only Silvery Dragon had some direct export sales made by itself, all the other companies export via an associated company: Tech & Trade, which is a trading company and responsible for the export sales. The rest companies only had domestic sales during the POI.

So Tech & Trade reported its top two export destinations in **B6 – other countries** and Silvery Dragon also reported its export sales during the POI as required in **B6 – Other countries**.

Silvery Dragon and Tech & Trade did not category trade levels and treated all customers as purchaser.

Appendix reference: **N/A**

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'.

Answer:

Silvery Dragon:

Silvery Dragon export or through Tech & Trade export the subject merchandise to other countries during the POI.

For export by Silvery Dragon, sales are made on CIF basis.

Tech & Trade:

As stated above, Tech & Trade is responsible for the export business. In order to cooperate in the investigation and reported all of the export sales required by the authority, Tech & Trade reported the B6 – Other countries as required.



Sales of Tech & Trade are made on a CIF or CFR basis, if the sale is not on CIF basis, the company will add the marine insurance to calculated the CIF values included in the Excel column labelled 'CIF value'.

For marine insurance, Tech & Trade adopted the marine insurance rate used for the sales made on CIF value to calculate. Calculation method for marine insurance rate, please kindly refer to [Appendix 11 – Marine Insurance rate](#).

Hejian Branch, Hejian Baozelong, Benxi Silvery and Xinjiang Silvery:

Not applicable since the company only had domestic sales during the POI.

Appendix reference: [Appendix 11](#)

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.

Answer:

Silvery Dragon, Tech & Trade:

Please kindly refer to [Appendix 12 – Export documents](#) as requested.

Hejian Branch, Hejian Baozelong, Benxi Silvery and Xinjiang Silvery:

Not applicable since the company only had domestic sales during the POI.

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.

Answer:

Silvery Dragon, Tech & Trade:

Please kindly refer to **B6 – Sales to other countries**.

Hejian Branch, Hejian Baozelong, Benxi Silvery and Xinjiang Silvery:

Not applicable since the company only had domestic sales during the POI.



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.

Answer:

Silvery Dragon, Tech &Trade:

The company reported actual expenses.

Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable since the company did not export the goods during the POI.

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.

Answer:

Silvery Dragon, Tech &Trade:

Not applicable since the company did not grant the discounts or rebates to customers in other countries and did not export the goods subject to review to the UK during the POI.

Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable since the company did not export the goods subject to review during the POI

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.

Answer:

Silvery Dragon, Tech &Trade:

Not applicable since the company did not grant the discounts or rebates to customers in other countries and did not export the goods subject to review to the UK during the POI.

Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable since the company did not export the goods subject to review during the POI

Appendix reference: [N/A](#)



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

Answer:

Silvery Dragon, Tech &Trade:

Not applicable since the company did not grant the discounts or rebates to customers in other countries and did not export the goods subject to review to the UK during the POI.

Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable since the company did not export the goods subject to review during the POI

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.

Answer:

Silvery Dragon, Tech &Trade:

Not applicable since the company did not grant discounts or rebates to customers in other countries and did not export the goods subject to review to the UK during the POI.

Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable since the company did not export the goods subject to review during the POI

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.

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

Answer:

Silvery Dragon, Tech &Trade:

The company allocated the domestic freight which are allocated based on the product quantity. Allocation method is as follows:

Domestic freight for each sale = Total domestic freight (POI)/ total quantity of the goods sold (POI) * each sales quantity

Total domestic freight(POI) is recorded under Sales expenses/transport expenses, and total quantity of the goods sold (POI) is recorded under Main business revenue.

Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable since the company did not export the goods subject to review during the POI

Appendix reference: [N/A](#)

C1.3 Differences in packing expenses

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

Answer:

Silvery Dragon, Tech &Trade:

Not applicable.

Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:



Not applicable since the company did not export the goods subject to review during the POI

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.

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

Answer:

Silvery Dragon, Tech &Trade:

The company reported the credit cost based on the payment terms of each sales. Calculation method adopted by the company is as follows:

Credit cost = Invoice value * interest rate/360 * payment terms

The company adopted interest rate of short-term loans published by The People's Bank of China as the interest rate to calculate the credit cost. Please see [Appendix 24 – Interest rate](#).

Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable since the company did not export the goods subject to review during the POI

Appendix reference: [Appendix 24](#)



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.

Answer:

Silvery Dragon, Tech &Trade:

Not applicable.

Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable since the company did not export the goods subject to review during the POI

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.

Answer:

Silvery Dragon, Tech &Trade:

Not applicable.

Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable since the company did not export the goods subject to review during the POI

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:

Answer:

Silvery Dragon, Tech &Trade:

Not applicable.

Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable since the company did not export the goods subject to review during the POI

Appendix reference: [N/A](#)

C1.8 Future adjustment

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?

Answer:

Silvery Dragon, Tech &Trade:

Not applicable.

Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable since the company did not export the goods subject to review during the POI

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company reports the actual expenses.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not grant discounts and rebates to customer in domestic market.

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.

Answer:



Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not grant discounts and rebates to customer in domestic market.

Appendix reference: [N/A](#)

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

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not grant discounts and rebates to customer in domestic market.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not grant discounts and rebates to customer in domestic market.

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.

Answer:



Silvery Dragon:

The company reported the domestic freight which are allocated based on the sales revenue. Allocation method is as follows:

Domestic freight for each sale = ([confidential formula])

Hejian Branch:

The company reported the domestic freight which are allocated based on the sales revenue. Allocation method is as follows:

Domestic freight for each sale = [confidential formula]

Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company reported the domestic freight which are allocated based on the product quantity. Allocation method is as follows:

Domestic freight for each sale = [confidential formular]

Total domestic freight(POI) is recorded under Sales expenses/transport expenses, and total quantity of the goods sold(POI) is recorded under Main business revenue.

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.



Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

There is no physical characteristics adjustment, this question is not applicable.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

There is no level of trade adjustment, 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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable.

Appendix reference: [N/A](#)

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

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable.

Appendix reference: [N/A](#)

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

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

During January to March of 2019, the company paid 16% VAT when the products sold on the domestic market, and received 10% VAT refund based on the FOB value of the products upon exportation.

During April to December of 2019, the company paid 13% VAT when the products sold on the domestic market, and received 10% VAT refund based on the FOB value of the product upon exportation.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Please see Appendix 25 – Supporting documents for VAT rate and VAT refund.

Appendix reference: [Appendix 25](#)

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:



The company reported the Invoice value excluding VAT amount in **B4 – Domestic sales, Annex II**.

Appendix reference: **N/A**

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company adopts one month as a taxable period, according to the article 23 of the *Interim Regulation of the People's Republic of China on Value Added Tax (2017 Revision)*, which shall file tax returns within 15 days after the expiration of such period.

The company uses account of taxes payable to record these taxes.

Appendix reference: **N/A**

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company reported the credit cost based on the payment terms of each sale. Calculation method adopted by the company is as follows:

Credit cost = [confidential formula]

VAT rate for January to March of 2019 is 16% and for April to December of 2019 is 13%.



The company adopted interest rate of short-term loans published by The People's Bank of China as the interest rate to calculate the credit cost. Please see [Appendix 24 – Interest rate](#).

Appendix reference: [Appendix 24](#)

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

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

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

First of all, the company's sales price for the goods subject to review is higher than other Chinese producers'. both in the domestic and export markets, and is not lower than the sales price of the producers in the UK.

Secondly, the company cannot lower its sales price for the goods subject to review because it sets sales price based on the cost.

Thirdly, if the existing anti-dumping measure on the goods subject to review is no longer applied, the company may receive some orders from the UK customer, but this will not be affect the sales volume of the company because it depend on the capacity of the company, and the company has no plans to increase its capacity.

Future sales volume and value of the company will not be affected if the existing anti-dumping measure on the goods subject to review 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.

Answer:

Silvery Dragon, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company provides [Appendix 13 – Income tax return \(2016 – 2019\)](#).

Hejian Branch:

Not applicable as the company is a branch of Silvery Dragon,

Appendix reference: [Appendix 13](#)

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

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong:

The company exported the goods subject to review through an associated company Tech & Trade during POI. Please see [Appendix 14 – Chart of Accounts of Tech & Trade](#).

Benxi Silvery:

The company sold the goods subject to review to Silvery Dragon, and Silvery Dragon exported the subject merchandise to other countries through Tech & Trade during the POI. Please see chart of accounts of Silvery Dragon in [Appendix 7](#) and the chart of accounts of Tech & Trade in [Appendix 14](#).

Xinjiang Silvery:

The company did not export the goods subject to review through an associated company during the POI, so this question is not applicable.

Appendix reference: [Appendix 7 and 14](#)

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company did not incur any extraordinary costs during POI.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Production facilities are located at the same address as the administrative office of the company, as reported in the Section A 1.1. The company only has one facility to produce the goods subject to review and did not subcontracted any stages.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The above companies use the same production process to produce the goods subject to review, so we provide the production process description of Silvery Dragon to illustrate.

Please see [Appendix 15 – Production process](#) for the goods subject to review with description.



Appendix reference: [Appendix 15](#)

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).

Answer:

Silvery Dragon:

The company did not import raw materials, main inputs to the production process are wire rod and purchased from associated or un-associated supplier.

Hejian Branch:

Main inputs to the production process are wire rod and purchased from associated or un-associated supplier.

Hejian Branch did not import input materials or parts to produce the goods subject to review.

Hejian Baozelong:

Main inputs to the production process are wire rod and purchased from associated or un-associated supplier.

Hejian Branch did not import input materials or parts to produce the goods subject to review.

Xinjiang Silvery:

Main inputs to the production process are wire rod and purchased from associated or un-associated supplier.

Xinjiang Silvery did not import input materials or parts to produce the goods subject to review.

Benxi Silvery:

Main inputs to the production process are wire rod and purchased from un-associated supplier.



Benxi Silvery did not import input materials or parts to produce the goods subject to review.

Appendix reference: [N/A](#)

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

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Production line used for manufacturing the goods subject to review does not produce other products. So this question is not applicable.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Source documentation for the data has been provided in **D4.1 – Upwards cost reconciliation**. Please see Appendix 16 – Cost reconciliation for the reconciliation documents for data filled in D4.1.

Appendix reference: [Appendix 16](#)

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.)

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Capacity is the theoretical capacity. The company calculated the capacity based on the [confidential] working days per year and under the condition that the machine is running at full load.

Capacity utilisation = Actual production/Capacity.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company has no plans to begin new product chains or increase current production capacity of goods in the UK market, domestic market or any other third country markets.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:



Plant production capacity cannot be used to produce other goods as the production line used to manufacture the goods subject to review will not be used to produce other products.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

There is no difference between the product produced by the company and purchased from other suppliers.

Appendix reference: [N/A](#)

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

There is no situation that the level of stocks abnormally high in any of the years/period covered by this investigation.

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?

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:



Stocks of the company will not be affected because the company arranges production in light of the client's order.

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.

Answer:

Silvery Dragon:

Average waste/scrap ratio resulting from the production process of the like goods is [confidential] %.

Hejian Branch:

Average waste/scrap ratio resulting from the production process of the like goods is [confidential] %.

Hejian Baozelong:

Average waste/scrap ratio resulting from the production process of the like goods is [confidential] %.

Xinjiang Silvery:

Average waste/scrap ratio resulting from the production process of the like goods is [confidential] %.

Benxi Silvery:

Average waste/scrap ratio resulting from the production process of the like goods is [confidential] %.

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.

Answer:



Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Waste wires are generated during the production process of the goods of subject to review, which are sold as scrap by the company and related sales income is recorded in the other business revenue.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Steel cuttings are generated during the production process, which is the scrap. So 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?

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company calculated figures of the labour based on the 2019 payroll.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company has no investment plans for the future.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as the company has no investment plans for future.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Please kindly refer to D10 – Purchases, Annex II.



Appendix reference: N/A

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

As the anti-dumping measure on the goods subject to review is affecting the export from China to UK, rather than affecting purchase of subject goods from UK. So, the company's purchasing patterns will not change if the existing anti-dumping measure on the goods subject to review no longer applied.

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**.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Calculation method for profit margin filled in D11 is listed as below:

Profit margin = Business profit/Business revenue

For business profit, please see Profit statement of the company.

For business revenue, please see main business revenue and other business revenue in the Profit statement of the company.

Please see Appendix 17 – Breakdown of the profitability calculation.

Appendix reference: [Appendix 17](#)

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Calculation method for AG&S costs filled in **D2** is listed as below:

[confidential formula]

Appendix reference: [N/A](#)

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

There is no differences in costs for the same PCN between D12.1 – CTM (the People’s Republic of China), D12.2 – CTM (3rd country). And the company did not export the goods subject to review to UK during POI, so D12.2 – CTM(UK) 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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Cost allocation method for each PCN for the POI is listed as below:

Each PCN’s cost = [confidential formula]

Appendix reference: *N/A*

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.



Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

The company did not finance the production of like goods. This question is not applicable.

Appendix reference: [N/A](#)

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

1. Please provide AS&G costs for:

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

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

- Provide details for each PCN of your goods during the POI, produced by your company or an associated party.
- If several internal company production or sales codes correspond to the same PCN, report each production or sales code separately.
- 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 AS&G, for each PCN for the POI, including an explanation of that allocation and apportion method under each cost type.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Allocation method for AS&G is listed as below:

AS&G for each PCN = [confidential formula]

Appendix reference: [N/A](#)



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

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

There are no differences in costs for the same PCN between D13.1 – AS&G for domestic market, D13.2 – AS&G for third countries. And the company did not export the goods subject to review to UK during POI, so D12.2 – AS&G for UK is not applicable.

Appendix reference: [N/A](#)

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

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

R&D expenses for the goods subject to review = [confidential formula]

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable, interest expenses are on individual company basis.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable, depreciation charges are on individual company basis.

Appendix reference: [N/A](#)

D14 Raw material (RM) and major input purchases

1. 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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Please kindly refer [Appendix 18 – Raw materials purchase documents](#).

Appendix reference: [Appendix 18](#)

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong and Xinjiang Silvery:



The company purchased the raw materials from associated and un-associated suppliers. For associated purchase, purchase prices are set based on the market price.

Benxi Silvery:

Benxi Silvery purchased raw materials from un-associated suppliers, so this question is not applicable.

Appendix reference: [N/A](#)

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.

Answer:

Silvery Dragon, Hejian Branch:

For purchased materials from independent companies, the company signs purchase contract with independent suppliers. And if freight is undertaken by supplier, then the material costs include transportation charges. If freight is undertaken by purchaser, then the material cost does not include the transportation.

Hejian Baozelong, Xinjiang Silvery:

For purchased materials from independent companies, the company signs purchase contract with independent suppliers. And material costs include the transportation charges.

Benxi Silvery:

For purchased materials from independent companies, the company signs purchase contract with independent suppliers. And material cost does not include the transportation charges.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Benxi Silvery and Xinjiang Silvery:

The company is not aware of any distortions in the domestic market related to any of the raw materials or other inputs used in the production of the goods subject to review or like goods. So 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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Benxi Silvery and Xinjiang Silvery:

Not applicable as there are not market distortions in the raw materials or other inputs used in the manufacture of the goods subject to review or the like goods.

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.



Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Benxi Silvery and Xinjiang Silvery:

Not applicable as there are not market distortions in the raw materials or other inputs used in the manufacture of the goods subject to review or the like goods.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Benxi Silvery and Xinjiang Silvery:

Not applicable as there are not market distortions in the raw materials or other inputs used in the manufacture of the goods subject to review or the like goods.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

Not applicable as there are not market distortions in the raw materials or other inputs used in the manufacture of the goods subject to review or the like goods.

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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

There are no other 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.

Answer:

Silvery Dragon, Hejian Branch, Hejian Baozelong, Xinjiang Silvery and Benxi Silvery:

First of all, the company's sales price for the goods subject to review is higher than other Chinese producers', both in the domestic and export markets, and is not lower than the sales price of the producers in the UK.

Secondly, the company cannot lower its sales price for the goods subject to review because it sets sales price based on the cost.



Thirdly, if the existing anti-dumping measure on the goods subject to review is no longer applied, the company may receive some orders from the UK customer, but this will not affect the sales volume of the company because it depend on the capacity of the company, and the company has no plans to increase its capacity.

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	<input checked="" type="checkbox"/>
Section B – Sales	<input checked="" type="checkbox"/>
Section C – Fair comparison	<input checked="" type="checkbox"/>
Section D – Costing information	<input checked="" type="checkbox"/>
Section E – Other questions	<input checked="" type="checkbox"/>
Section F – Declaration	<input checked="" type="checkbox"/>

Electronic data	Please tick if you have provided spreadsheets
INCOME STATEMENT	<input checked="" type="checkbox"/>
TURNOVER – Sales summary	<input checked="" type="checkbox"/>
UK SALES – List of sales to the UK	<input checked="" type="checkbox"/>
DOMESTIC SALES – List of all domestic sales of like goods	<input checked="" type="checkbox"/>
THIRD COUNTRY – Third country sales	<input checked="" type="checkbox"/>
PRODUCTION – Production figures	<input checked="" type="checkbox"/>
DOMESTIC COSTS – Costs of goods sold domestically	<input checked="" type="checkbox"/>
UK COSTS – Costs of goods sold to the UK	<input checked="" type="checkbox"/>

+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
Please refer to the attachments	

+Add additional rows as required



Annex I: Questionnaire for companies associated with the exporting producer involved in sales or marketing

Guidance

The questionnaire in this annex is an essential part of the questionnaire and is intended for companies associated with the exporters that are **not involved in production** of the goods subject to review but **are involved in the sale or marketing** of the goods in the UK. All general instructions, deadlines and so on stated above are directly applicable. Each associated company involved has to complete the questionnaire in this annex separately.

It is essential that the Product Control Numbers used are totally consistent with those used by your associated company.

The questionnaire is divided into three parts:

Section I – Associated company information

Section II – Information relating to purchase prices and stocks

Section III – Information relating to resale prices

Related persons

As a reminder, please refer to the definition of related persons under **A3 – Organisational structure**.



Section I of Annex I: Associated company information

S1.1 – Identity and contact details

1. Please complete the table below.

Legal name of company:	Tianjin Silvery Dragon Group Tech.& Trade Co., Ltd.	
Legal structure (e.g. Representative Office, Sales Office, Sino-Foreign Joint Venture etc):	Limited Liability Company	
Year of establishment:	June 23, 2009	
Other operating names:	N/A	
Name (point of contact):	[REDACTED]	
Position:	[REDACTED]	
Address:	Jingjin Road East, Beichen District, Tianjin	
Telephone No:	[REDACTED]	
Email:	[REDACTED]	
Website:	N/A	

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:	Dentons Europe LLP
Address:	Rue de la Régence 58, 1000 Brussels Belgium
Telephone No.:	[REDACTED]
Email:	[REDACTED]
Confirm they have signed authority to act (Yes/No):	YES
	Appendix reference:

S1.2 – About your business

1. Please provide the details of any other business name you use to sell or market the goods subject to review.



Answer:

Not applicable as Tianjin Silvery Dragon Group Tech.& Trade Co., Ltd. ("Tech.&Trade") did not use any other business name to sell or market the goods subject to review.

Appendix reference: [N/A](#)

2. Please provide a list of all your company's shareholders that owned more than 5% of its shares during the period of investigation (POI) in **S1.2.1 – Shareholders in Annex I (Associated companies – Exporter)**. Where known, please give details of their activities in the table.

Answer:

Please kindly refer to [S1.2.1 – Shareholders in Annex I](#).

3. Describe all other goods sold, marketed or otherwise concerned by your company, in the UK. Please complete **S1.2.2 – Other Goods, Annex I (Associated companies – Exporter)** showing the volume and value of these goods.

Answer:

Not applicable as the company did not sell other goods in the UK during POI.

4. Please explain, or demonstrate in a diagram, the overall internal hierarchical and organisational structure of your company. This diagram should show all units involved in the sale and distribution of the goods subject to review in the UK and the original market of imports. Clearly state the role of your company.

Answer:

Please kindly refer to [Appendix 19 – Internal organization diagram \(Tech.&Trade\)](#).

Appendix reference: [Appendix 19](#)

5. Provide an explanation and diagram outlining your company's worldwide corporate structure and affiliations, including parent companies, subsidiaries or other associated companies.

Answer:

Please kindly refer [Appendix 20 – Worldwide corporate structure \(Tech.&Trade\)](#).

Appendix reference: [Appendix 20](#)



S1.3 – 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?
Jingjin Road East, Beichen District	All of the company's accounting records
N/A	N/A

+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.

Answer:

Financial year of the company is from 1 January to 31 December of each calendar year, which has not changed during the last four financial years.

Appendix reference: N/A

3. 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.

Answer:

Please kindly refer to [Appendix 21 – Audit report of Tech & Trade \(2018-2019\)](#).

Appendix reference: Appendix 21

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

Answer:

The company has provided the audit report therefore this question is not applicable.

Appendix reference: N/A



5. If internal financial statements, management reports, etc. are prepared and maintained for the goods subject to review, please provide copies for your most recent financial year and the POI.

Answer:

Not applicable as the company has no internal financial statements, management reports, etc. prepared and maintained for the goods subject to review.

Appendix reference: [N/A](#)

S1.4 – Employment and turnover

1. Please complete **S1.4.1 – Employment, Annex I (Associated companies – Exporter)**.
2. Please complete **S1.4.2 – Turnover, Annex I (Associated companies – Exporter)**.

Answer:

Please kindly refer to [S1.4.1 – Employment](#) and [S1.4.2 – Turnover](#) in Annex I.



Section II of Annex I: Information relating to purchase prices and stocks

S2.1 – Purchases and stocks

Please complete **S2.1.1 – Purchases** in **Annex I (Associated companies – Exporter)**.

1. Please give a detailed description of how purchases of the goods subject to review are made. Take into consideration:
 - the terms of your contract with the supplier (provide a copy);
 - the administrative arrangements involved from the ordering of the goods until their arrival, including customs clearance (if applicable);
 - the terms of payment;
 - transport, insurance, handling, loading and ancillary costs;
 - warranties;
 - guarantees;
 - technical assistance;
 - after sales service, etc.

Answer:

The company purchase the goods subject to review from the associated company – Silvery Dragon. As they are associated, Tech. & Trade did not sign contract with Silvery Dragon, the company will issue VAT invoice to Silvery Dragon after it completed the payment.

Appendix reference: [N/A](#)

2. From the manufacturing of the goods subject to review to the point at which your exports reach the UK, please describe the physical movement of the goods throughout the whole process. In your explanation, please include all customs offices involved in the customs clearance of the goods.

Answer:

Not applicable as the company did not export the goods subject to review to UK during POI.

Appendix reference: [N/A](#)

3. Please list all locations where your company keeps stocks of the goods subject to review.

Answer:



Not applicable as the company has no warehouse to keeps stocks of the goods subject to review.

Appendix reference: [N/A](#)

4. For the goods subject to review, report all your company's purchases made during the 12 months before the POI but exported during the POI. Add this to **S2.1.2 – Purchases before POI** in the Excel document in **Annex I (Associated companies – Exporter)** provided.

Answer:

Please kindly refer to [S2.1.2 – Purchases before POI](#) in **Annex I**.

5. Report additional information relating to your purchases of the goods subject to review during the POI. Add this to **S2.1.3 – Purchase information** in the Excel document in **Annex I (Associated companies – Exporter)** provided.

Answer:

Please kindly refer to [S2.1.3 – Purchase information](#) in **Annex I**.

6. Report all of the stock purchased by your company. Add this to **S2.1.4 – Stocks** in the Excel document in **Annex I (Associated companies – Exporter)** provided.

Answer:

Not applicable as the company has no stock.



Section III of Annex I: Information relating to resale prices

This information should be provided **only** for the POI, thus please provide all invoices falling within the POI.

S3.1 – General information

1. Describe the physical flows (e.g. inputs and products) and the financial flows (e.g. invoices and payments) involved.

Answer:

Please kindly refer to [Appendix 22 - Sales flowchart](#) and [Appendix 23 – Financial flowchart](#) of Tech &Trade.

Appendix reference: [Appendix 22](#),
[Appendix 23](#)

2. Include a detailed flow chart demonstrating terms of sale and pricing to each customer category (e.g. traders, distributors, wholesalers, industrial users, end users, etc.) including associated companies.

Answer:

The company did not category the customer and treated all customers as purchaser. This question is not applicable.

Appendix reference: [N/A](#)

3. If the goods subject to review are changed in any way between purchase and resale, please provide details.

Answer:

Not applicable as the goods subject to review will not be changed between purchase and resale.

Appendix reference: [N/A](#)

4. Describe each step in the sales negotiation process, from the first point of contact with the purchaser through to any after sales price adjustments.

Answer:



The customer sends the specification, quantity and other requirements of the product to the company and asks for the company's quotation. Then, the company will quote base on the customer's order and the customer may then bargain with the company. After the price is agreed by both parties, the customer will send purchase order to the company for confirmation.

Appendix reference: N/A

5. Explain how sales prices are set 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.

Answer:

Sales prices of the company are set based on the cost of the goods subject to review.

Appendix reference: N/A

6. Please provide copies of all price lists issued or in use during the POI.

Answer:

Not applicable as the company has no price list.

Appendix reference: N/A

S3.2 – Sales to independent customers in the UK

In this part of Section III, you need to provide information on the sales of the goods under consideration made by your company directly to independent customers.

1. Please complete **S3.2 – Sales to ind. customers** in the Excel document in **Annex I (Associated companies – Exporter)** provided. Show all sales of the goods subject to review made by your company to independent customers for consumption in the UK on a transaction-by-transaction basis.

Answer:

Not applicable as the company did not export the goods subject to review to UK during POI.

2. Please explain how you have calculated the CIF values as stated in the CIF value column in the table.

Answer:



Not applicable as the company did not export the goods subject to review to UK during POI.

Appendix reference: N/A

This listing should use the same Product Control Numbers as reported in the table of PCN codes included in the instruction section. Each product sale on a given invoice with a different PCN should be recorded as a separate transaction.

S3.3 – Sales to associated parties

Please communicate with your associated parties for the responses to each of the questions within this section.

Please ensure that the information provided by the associated company in **Section II** above is easily and fully reconcilable with the information given below.

1. Please complete **S3.3 – Sales to associated parties** in the Excel document in **Annex I (Associated companies – Exporter)** provided. Show all sales of the goods subject to review made by your company to associated customers for consumption in the UK on a transaction-by-transaction basis.
2. Please explain how you have calculated the CIF values as stated in the CIF value column in the table.

Answer:

Not applicable as the company did not export the goods subject to review to UK during POI.

Appendix reference: N/A



Signature (Annex I)

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