AD/EXP/2026/01
NON-CONFIDENTIAL

QUESTIONNAIRE FOR FOREIGN PRODUCERS AND EXPORTERS ON THE PETITION OF ANTI-DUMPING DUTIES INVESTIGATION

Foreign producers and exporters submitting must ensure that:

- **submissions are to be filed on the Trade Remedies Investigation Management (TRIMA) system (https://traderemedies.miti.gov.my);**
- **each page is to be labelled either "Confidential" or "Non-Confidential";**
- **Non-Confidential summaries are provided in sufficient detail to permit a reasonable understanding of the substance of the confidential information;**
- **if such information is not susceptible of summary, a statement of reasons why summarisation is not possible shall be provided; and**
- **the Foreign producers and exporters 's declaration is to be completed.**

FOREIGN PRODUCER/EXPORTER:
NAM KIM STEEL JOINT STOCK COMPANY

SUBJECT MERCHANDISE:
FLAT ROLLED PRODUCT OF OTHER ALLOY AND NON-ALLOY STEEL, PLATED OR COATED WITH ALUMINIUM AND ZINC

MINISTRY OF INVESTMENT, TRADE AND INDUSTRY
MALAYSIA

INTRODUCTION

FOREIGN PRODUCER/EXPORTER	: **NAM KIM STEEL JOINT STOCK COMPANY**
SUBJECT MERCHANDISE	: **FLAT ROLLED PRODUCT OF OTHER ALLOY AND NON-ALLOY STEEL, PLATED OR COATED WITH ALUMINIUM AND ZINC**
H.S. CODES / AHTN	: **7210.61.11 00, 7210.61.12 00, 7210.61.91 00, 7210.61.92 00, 7210.61.99 00, 7212.50.23 00, 7212.50.24 00, 7212.50.29 00, 7225.92.90 00, 7225.99.90 00, 7226.99.19 00 and 7226.99.99 00.**

Note: The H.S. Codes and AHTN are given for information only and these classifications of the subject merchandise have no binding effect.

ORIGINATING IN	: **PEOPLE'S REPUBLIC OF CHINA, CHINESE TAIPEI AND SOCIALIST REPUBLIC OF VIET NAM**
EXPORTED FROM	: **PEOPLE'S REPUBLIC OF CHINA, CHINESE TAIPEI AND SOCIALIST REPUBLIC OF VIET NAM**

For the purpose of this submission:

Year 1	**: 1 JANUARY 2023 – 31 DECEMBER 2023**
Year 2	**: 1 JANUARY 2024 – 31 DECEMBER 2024**
Period of Investigation (POI)	**: 1 JANUARY 2025 – 31 DECEMBER 2025**

STATUTORY REFERENCE:

Countervailing and Anti-Dumping Duties Act 1993 [Act 504]
Countervailing and Anti-Dumping Duties Regulations 1994 [Regulations 1994]
Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994

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PREAMBLE

Please read this section before you proceed to answer the questions.

1. Ministry of Investment, Trade and Industry (MITI) has received a petition for the imposition of anti-dumping duties against a subject merchandise that your company export to Malaysia.

2. The World Trade Organization (WTO), to which Malaysia is signatory, provides remedies by way of duties where imported products are found to be dumped and causing or threatening to cause material injury to the domestic industry producing the like product.

3. The purpose of countervailing and anti-dumping legislation is to empower the Government of Malaysia (the Government) to take remedial measures against unfair trading by foreign producers/exporters and to provide a framework for investigating allegations of injury caused by dumped or subsidised imports.

4. The Petitioner alleged that the subject merchandise was imported at dumped prices and has materially injured the domestic industry. As required by the Countervailing and Anti-Dumping Duties Act 1993 (Act 504) and the Countervailing and Anti-Dumping Duties Regulations 1994 (Regulations 1994), the Petitioner provided a detailed petition substantiating the allegations. A copy of non-confidential version of the petition is attached in the Trade Remedies Investigation Management (TRIMA) system.

5. MITI has accepted the petition and has initiated an investigation. MITI is not an advocate for any party in these inquiries, but analyses the information produced by the interested parties to reach an impartial decision based on all the facts presented. MITI urges producers/exporters to complete this questionnaire and submit the response in the TRIMA system within the time frame specified in the attached Notice of Initiation.

GENERAL INSTRUCTIONS

A. Guidelines to Complete the Questionnaire

1. Please refer to the notice of initiation and non-confidential version of the petition and read the instructions carefully before completing the questionnaire.

2. Any related companies which are involved the production and/or sales of subject merchandise to Malaysia is to complete and submit their own separate questionnaire response in TRIMA system.

3. Please answer all questions in the order presented. Ensure that all information and tables conform strictly to the prescribed format and are clearly labelled.

4. The respondent shall not alter the existing set of questions by inserting, deleting, modifying or any other means that may impinge upon the information requested by the Government of Malaysia (Government). Any unauthorised alteration may result in the rejection of the submission.

5. Please ensure the questionnaire is accurate, complete and includes all necessary supporting documentation. Additional data may be provided if it strengthens the case for the allegation of dumping or injury. If a question is not applicable to your company, clearly state "**Not Applicable**" and **state the reason / justification**.

6. All information required in the Tables of this questionnaire must be completed in the respective Sections, and cannot be answered solely by referring to attachments. Exceptional is made for **Tables B-3, C-5, C-8.1, C-8.2, D-3.1, D-3.2, E-3.1, E-3.2, E-3.3, F-2.1, F-3.1, F-3.2, F-3.3 and F-3.4.**which must be submitted using the official Excel templates provided.

7. All documents, supporting evidence, and source materials submitted in a language other than *Bahasa Melayu* or English must be accompanied by an official English translation from an **accredited translator or institution**. Failure to provide a certified English translation may result in the submitted information being disregarded.

8. For the purpose of submitting this questionnaire, all data and information provided must be extracted from the respondent's official accounting records.

9. The respondent must **explicitly identify** all units of measurement and currencies used in every table and calculation. These units and measurements must be **applied consistently** throughout the entire questionnaire to ensure data integrity. Furthermore, the respondent must clearly cite the source(s) for all statistical figures and external data provided.

10. Information submitted in this questionnaire may be subject to verification by the Investigating Authority (IA). Accordingly, the respondent must identify and retain all worksheets, supporting evidence and source documents used to compile the

response and be prepared to substantiate all submitted information during the verification process.

11. The verification process is limited to validating the accuracy and completeness of the information already submitted in the questionnaire. Failure to provide source documents that reconcile with the questionnaire data may lead to the information being disregarded.

12. If you intend to have another party act on your behalf, you must ensure that the Government receives a properly documented **Letter of Authorisation**. This applies to any legal representative, consultant, or any third party representing the company. The Government must be notified of such appointments expeditiously to ensure all communications are legally recognised.

13. In case your company does **not export** the subject merchandise, submit a properly documented statutory declaration signed before a Notary Public/Commissioner for Oaths (refer to page **x** of the questionnaire).

B. Time Limits and Non-Cooperation

1. You should be aware that your responses to the questionnaire will constitute the body of information on the basis of which preliminary and final findings will be determined. In this respect, it is essential that your responses to the questionnaire and any material corrections be submitted within the time limits provided for this purpose.

2. Failure to answer all applicable questions accurately may compel MITI to use facts available from other sources. If MITI finds that any interested party has supplied false or misleading information, MITI shall disregard any such information in accordance with Section 36 of Act 504 and make use of facts available in accordance with Section 41 of Act 504.

3. You should also be aware that if all relevant information requested is not received by the IA within the specified time limits, or the submission of incomplete, false or misleading information is the case, the preliminary and final determination may be made on the basis of facts available in accordance with Section 41 of Act 504, based on Article 6.8 and Annex II of the Agreement on Implementation of Article VI of The General Agreement on Tariffs and Trade 1994.

4. The IA may disregard any late response, or any responses, which are significantly incomplete, false or misleading to an extent that they would be likely to impede the investigation process and may establish preliminary or final findings on the basis of facts available, which may include the information set out in the petition.

C. Submission of questionnaire responses via TRIMA system

1. In accordance with Regulation 37(4) and 37(6) of Regulations 1994, the respondent is required to submit **both** confidential and non-confidential versions of the submission via the **Trade Remedies Investigation Management (TRIMA) system (https://traderemedies.miti.gov.my)**. Every page must be clearly labelled or marked as either "**CONFIDENTIAL**" or "**NON-CONFIDENTIAL**".

2. All information designated as confidential will be treated as such by the Government. The non-confidential version will be placed in the public record and made accessible for public viewing through the **TRIMA system**.

3. Due to the sensitive nature of the information, all documents shall be properly labelled and uploaded to their respective sections within TRIMA. The Government shall not be held liable for the disclosure of confidential data that is improperly labelled or uploaded to incorrect, non-confidential sections by the respondent.

4. Files must be compatible and submitted in PDF, Excel or Word formats. Please ensure that the file names do not contain special characters [e.g., ! @ # $ % ^ & * ( ) + = { } [ ] ; : " ' <> ? , \ / | ` ~].

5. Data files must maintain the structure and column headings as proposed in the respective sections. The original order of data, field names and all formulas used within the spreadsheets must be preserved.

6. The TRIMA User Manual is available for reference within the TRIMA system.

D. How to Complete the Non-Confidential Version

1. Interested parties providing confidential response to the questionnaire are required to furnish non-confidential summaries thereof. In this regard, the following conditions apply:

   a. the non-confidential summaries shall be provided in sufficient detail to permit a reasonable understanding of the substance of the information submitted in confidence. In exceptional circumstances, a party may indicate that such information is not susceptible to summarisation; in such cases, a formal statement of reasons explaining why summarisation is not possible shall be provided;

   b. if it is considered that a request for confidentiality is not warranted and if the supplier of the information is either unwilling to make the information available or to authorise its disclosure in generalised or summary form, such information may be disregarded; and

   c. this is only exceptional for **Tables B-3, C-5, C-8.1, C-8.2, D-3.1, D-3.2, E-3.1, E-3.2, E-3.3, F-2.1, F-3.1, F-3.2, F-3.3 and F-3.4.** The Government acknowledges that the disclosure of raw data in these tables would provide a significant competitive advantage to a competitor or result in a significantly adverse effect upon the person supplying the information or from whom that person acquired the information.

2. When completing the non-confidential submission, the respondent should bear in mind that all exporters, importers, Malaysian domestic producers and other interested parties will have access to it. The non-confidential submission should be sufficiently details to permit a reasonable understanding of the substance of the information submitted in confidence.

3. To assist in completing the non-confidential submission, the respondent is advised to use your completed confidential response as a basis. All information in the confidential version that is not considered confidential should be copied directly to the non-confidential version. In exceptional circumstances, where non-confidential summary cannot be provided, a formal statement of reasons must be included.

4. The Government may disregard submitted information under the following circumstances:

   a. If the Government finds that a request for confidentiality is not warranted, and the respondent is either unwilling to make the information public or to authorise its disclosure in generalised or summary form. In such cases, the information may be excluded unless its accuracy can be demonstrated to the satisfaction of the Government through appropriate sources; or

   b. If the non-confidential summaries, or the reasons provided for the inability to summarise (as outlined in Paragraph 1(a)), are deemed inadequate or fail to provide a reasonable understanding of the substance of the confidential data.

5. The respondent may use the following examples to summarise confidential information:

   a. When the information concerns numerical data across multiple years, the respondent should use indices to show the trend.

   Formula:

$$\text{Index} = \frac{\text{Current period value}}{\text{Base period value}} \times 100$$

   Example of confidential information:

Description	Q1	Q2	Q3	Q4	Year 1
Volume (MT)	14,250 (Quarterly Base)	16,890	19,410	22,115	72,665 (Yearly Base)
Value (RM)	84,200 (Quarterly Base)	81,050	78,520	76,000	319,770 (Yearly Base)

Description	Q1	Q2	Q3	Q4	Year 2
Volume (MT)	15,000	14,500	12,300	14,000	55,800
Value (RM)	81,200	83,000	77,700	82,000	323,900

Description	Q1	Q2	Q3	Q4	POI
Volume (MT)	18,200	19,500	20,300	21,200	79,200
Value (RM)	82,500	81,550	79,500	85,050	328,600

   The non-confidential summary (indexed):

Description	Q1	Q2	Q3	Q4	Year 1
Volume (MT)	100 (Quarterly Base)	118	136	155	100 (Yearly Base)
Value (RM)	100 (Quarterly Base)	96	93	90	100 (Yearly Base)

Description	Q1	Q2	Q3	Q4	Year 2
Volume (MT)	105	102	86	98	77
Value (RM)	96	99	92	97	101

Description	Q1	Q2	Q3	Q4	POI
Volume (MT)	128	137	142	149	109
Value (RM)	98	97	94	101	103

b. When confidential information concerns a single sensitive commercial detail or figure, redaction may be applied by using **[xxx]**. If a value is redacted, the unit of measurement or currency should remain visible where possible to provide context.

Example of confidential version:

"Cost of production is RM 3,000 per tonne which consist 70% of raw materials cost."

The non-confidential summary (redacted):

"Cost of production is RM [xxx] per tonne which consist [xxx]% of raw materials cost."

c. When confidential information involves specific names of parties or sensitive commercial terms, the respondent should summarise the text by replacing identifying details with their functional roles or using [xxx] placeholders.

Example of confidential version:

"TRADING COMPANY LTD stated that they acquired a ZRM Machine from JITU MACHINERY LTD on 20 September 2019. The product produced from the machine was sold to JIWA TRADING LTD. The product price was negotiated with a profit margin of 5% prior signing of the contract between the commercial and procurement department."

The non-confidential summary (functional redaction):

"TRADING COMPANY LTD stated that they acquired a [Machine] from [Supplier] on [Date]. The product produced from the machine was sold to [Customer]. [xxx] – Commercially sensitive details relating to price negotiations and margins]."

CHECKLIST

The purpose of the following checklist is to ensure that all questions from Section A to Section F have been answered and to permit a quick survey of any potentially missing information. Tick the relevant boxes to confirm where complete information has been submitted.

Section	***Tick if complete information has been provided***
Declaration Form (signed and stamped)	✓
Section A: Company Structure & Operations	✓
Section B: Product Description	✓
Section C: Operation	✓
Section D: Domestic Sales of the Like Product	✓
Section E: Export Sales of the Subject Merchandise	✓
Section F: Costs	✓

TÔN NAM KIM

THƯƠNG HIỆU QUỐC GIA Vietnam Value

MINISTRY OF INVESTMENT, TRADE AND INDUSTRY MALAYSIA

DECLARATION

FOREIGN PRODUCER'S / EXPORTER'S SUBMISSION IN RELATION TO A PETITION FOR ANTI-DUMPING DUTIES INVESTIGATION

I hereby declare that **NAM KIM STEEL JOINT STOCK COMPANY** does manufacture/export the subject merchandise and have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

I affirm that the information contained in this questionnaire is complete and correct.

I understand that the information submitted may be subject to verification by the Government of Malaysia (Government) and any information submitted to the Government after the due date shall not be considered by the Government.

I agree should I refuse access to, or otherwise do not provide, necessary information within a reasonable period or significantly impede an investigation, including refuse to allow verification of its information; preliminary and final determinations in investigations under this Act may be made on the basis of the facts available, including the facts contained in this questionnaire response in accordance with regulation 9 of the Countervailing and Anti-Dumping Duties Regulation 1994 (Regulations 1994), as the case may be.

I agree that should the Government find any part of this questionnaire response is incomplete or incorrect, where the Government determines that it would impede or disrupt the investigation, or would adversely affect the rights of interested parties, the information shall be rejected without prejudice to whatever penalties that may be applicable under the Countervailing and Anti-Dumping Duties Act 1993 or any other written law.

Signature : _____

M.S.D.N:3700477019-C.T.C.P
CÔNG TY CỔ PHẦN THÉP NAM KIM
P.BÌNH DƯƠNG-TP.HỒ CHÍ MINH

Name : Nguyen Thi Ngoc Lien

Designation : Deputy General Director

Date : 21st September, 2026

SECTION A: COMPANY STRUCTURE AND OPERATIONS

A-1 Contact Information

Company

Name:

Address:

Telephone:

Email:

Web page:

Factory

Name:

Address:

Telephone:

Email:

Contact person

Name:

Position/Designation:

Address:

Telephone:

Email:

RESPONSE:

Company

Name: **Nam Kim Steel Joint Stock Company**
("**NKG**" or "**Nam Kim Steel**" or "**Company**")
Address: Lot A1, D2 Street, Dong An 2 Industrial Park, Binh Duong Ward, Ho Chi Minh City.
Telephone: N/A
Email: info@namkimgroup.vn
Web page: https://tonnamkim.com/

Factory

Name: **Factory Nam Kim 1**

Address: Lot B2.2 - B2.3, D3 Street, Dong An 2 Industrial Park, Binh Duong Ward, Ho Chi Minh City.
Telephone: N/A
Email: info@namkimgroup.vn

and/or

Name: **Factory Nam Kim 2**
Address: Lot A1, D2 Street, Dong An 2 Industrial Park, Binh Duong Ward, Ho Chi Minh City.
Telephone: N/A
Email: info@namkimgroup.vn

Contact person

Name: **[Confidential information on contact person]**
Position/Designation: [Confidential information on contact person]
Address: Lot A1, D2 Street, Dong An 2 Industrial Park, Binh Duong Ward, Ho Chi Minh City.
Telephone: [Confidential information on contact person]
Email: [Confidential information on contact person]

and/or

Name: **[Confidential information on contact person]**
Position/Designation: [Confidential information on contact person]
Address: Lot A1, D2 Street, Dong An 2 Industrial Park, Binh Duong Ward, Ho Chi Minh City.
Telephone: [Confidential information on contact person]
Email: [Confidential information on contact person]

A-2 Legal Representative/Consultant

If you have appointed a legal representative or consultant to assist you in this proceeding as notified in the **Letter of Authorisation** submitted to the Government, please provide the following details:

Name of firm :
Name of legal representative/consultant :
Name of contact person :
Address :
Telephone :
Email :

RESPONSE:

Name of firm: **Skrine Advocates & Solicitors**
Name of legal representative/consultant: Mr. Manshan Singh / Ms. Ho Pui Yan / Ms. Lim Shu Yi
Name of contact person: Mr. Manshan Singh / Ms. Ho Pui Yan
Address: Skrine, Level 8, Wisma UOA Damansara, 50 Jalan Dungun, Damansara Heights 50490 Kuala Lumpur.
Telephone: + (603) 2081 3999
Email: manshan.singh@skrine.com
ho.pui.yan@skrine.com

A-3 Corporate Information (including related parties)

1. Indicate your company registered name and form of business organisation (e.g., company, partnership or sole proprietorship). If you trade in a name other than this registered name, indicate the name(s) used.

RESPONSE:

Legal name: **Nam Kim Steel Joint Stock Company** (NKG)
Form: Joint Stock Company listed on the stock exchange with stock code NKG
Date of incorporation: [date]

NKG only uses its registered business brand name (Ton Nam Kim) to sell the Product Under Investigation ("**PUI**").

2. List the principal shareholders of your company and indicate the percentage of shareholding and the activities of these shareholders. For this purpose, use Table A-3.1. Structural diagrams may also be provided to illustrate and support your explanation.

Table A-3.1: Shareholdings

Name of shareholder	Activity of shareholder	Percentage of shareholding

RESPONSE:

Table A-3.1: Shareholdings

Name of shareholder	Activity of shareholder	Percentage of shareholding
[***]	[***]	[***]

The above shareholding information is updated as of 20 March 2025.

According to Law on Securities in Vietnam No. 54/2019/QH14: *A major shareholder means a shareholder that holds at least 5% of the voting shares of an issuer*. During the POI, [***].

Please refer to **Exhibit A-3.2 – Shareholding List _CONF** for official shareholding list of Nam Kim during the POI.

[Note: The above information in asterisk and **Exhibit A-3.2** are provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

3. Please provide:

   a. A comprehensive diagram outlining the global hierarchy, including all parent companies, subsidiaries, and related entities in all countries.

RESPONSE:

Nam Kim Steel is [***].

Nam Kim Steel has [xxx] affiliated companies:

[Names of affiliated companies]

All of these companies are registered with a business license in Vietnam only.

However, [xxx] of these affiliates — [names of affiliated companies] — do not produce the PUI.

Only [name of affiliated company] aims to produce and sell the subject merchandise/like product. However, during the POI, [***].

Therefore, during the POI (2025), [name of affiliated company] did not conduct any sales transactions with customers.

In 2025, Nam Kim Steel established a subsidiary to provide [***].

The service provider is [name of affiliated company], which was established in [date] with a charter capital of VND [xxx] billion. Nam Kim Steel contributed approximately VND [xxx] billion, representing [xxx]% of the charter capital. The company commenced [***] in [date].

The ownership of Nam Kim Steel in these companies is detailed in **Exhibit A-3.3.a – Subsidiaries Diagram _CONF**.

[Note: The above information in asterisk and **Exhibit A-3.3.a** are provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

   b. A detailed diagram of the company(ies)'s all internal departments and reporting lines.

RESPONSE:

Nam Kim Steel is a publicly listed company with stock code "NKG". There are [xxx] departments in our organisation. Each department has its particular function and is controlled by the Board of Management:

[***]

Please refer to **Exhibit A-3.3.b – Organisation Structure_CONF** for a diagram on the Company's internal organisational structure.

[Note: The above information in asterisk and **Exhibit A-3.3.b** are provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

c. A detailed diagram identifying all units involved in the production, R&D, sales, distribution, and supply of the like product and subject merchandise for both the domestic and export markets during the period of investigation.

RESPONSE:

Please refer to **Exhibit A-3.3.b – Organisation Structure_CONF** for a diagram on the Company's internal organisational structure.

d. Copies of legal documents (e.g., memorandum of association, article of association, business registration, business operation license, etc.)

RESPONSE:

Please refer to **Exhibit A-3.3.d.1 – Charter_CONF** for Nam Kim Steel's Company Charter and **Exhibit A-3.3.d.2 – Business Certificate_CONF** for Nam Kim Steel's business registration certificate (both in Vietnamese and English).

[Note: **Exhibit A-3.3.d.1** and **Exhibit A-3.3.d.2** are provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

e. A copy of relevant brochures or pamphlets on your business activities.

RESPONSE:

Please refer to **Exhibit A-3.3.e – Product Brochure_CONF** for Nam Kim Steel's general company brochure / catalogue.

[Note: **Exhibit A-3.3.e** is provided in the Confidential Submission. A summary is not possible as it contains confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

f. If the subject merchandise exported into Malaysia were manufactured in another country, explain whether such products exported to the exporting country or is merely transhipped through it. In the latter case, please identify the foreign producer of the products. In all cases, please describe the nature of your relationship. State whether you share any board members or senior executive with any of those entities. If so, identify these persons and the nature of their mutual affiliations. Attach copies of any arrangements between the parties.

RESPONSE:

Not applicable. Nam Kim Steel operates solely in Vietnam, where it produces both the like product and the subject merchandise. We do not manufacture in any other country or export products to Malaysia through transshipment via another country.

g. Please indicate Tax Identification Number (TIN) and VAT/GST or any related indirect tax registration number with a supporting official document. Provide a copy of the most recent company's Transfer Pricing Documentation (TPD) that was submitted to the relevant authority, the most recent TPD audit findings and respective summary by the respective authority. If your company do not maintain a TPD, please provide evidence to support your claim (i.e., National Tax Legislation on TPD).

RESPONSE:

The Tax Identification Number (TIN), VAT / GST of Nam Kim Steel is the Business Registration Number, which is **[xxx]**. Please refer to **Exhibit A-3.3.d.2** for Nam Kim Steel's business registration certificate (in Vietnamese and English).

Nam Kim Steel does not maintain Transfer Pricing Documentation (TPD) because it is not required under Vietnamese law. Specifically, **Clause 1, Article 19 of Decree 132/2020/ND-CP** on tax administration for enterprises engaging in related-party transactions exempts certain taxpayers from the obligation to declare and prepare dossiers for the determination of related-party transaction prices:

"Article 19. Cases of exemption from declaration and preparation of dossiers for determination of related-party transaction prices

1. A taxpayer shall be exempted from making declaration for determination of related-party transaction prices referred to in Sections III and IV in the Appendix I to this Decree, and from preparing dossiers for determination of related-party transaction prices only if it has transactions with related parties that are liable to pay enterprise income tax in Vietnam, subject to the same enterprise income tax rate as applied to the taxpayer, and neither of them is entitled to enterprise income tax incentives in a tax period, but shall provide bases for such exemption in Sections I and II in the Appendix I to this Decree.

Accordingly, a taxpayer shall be exempt from making a declaration for determination of related-party transaction prices and from preparing dossiers for determination of related-party transaction prices if it only engages in related-party transactions with entities that are

liable to pay enterprise income tax in Vietnam, subject to the same enterprise income tax rate as applied to the taxpayer, and neither of them is entitled to enterprise income tax incentives in a tax period."

Please refer to **Exhibit A-3.3.g – Vietnamese Law on TPD_PUBLIC** for a copy of **Decree 132/2020/ND-CP** (in Vietnamese and English).

Nam Kim Steel and all of its affiliate companies are:

[***]

Therefore, Nam Kim Steel is exempted from the requirement to prepare / maintain a TPD under Vietnamese law.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

4. List the names, addresses, email and telephone numbers of all subsidiaries or other related companies in all countries that are involved with the production, sale, R&D, distribution and supply of the subject merchandise in Malaysian market and export market during the investigation period. Specify the activities of each related company and percentage of shares owned. For this purpose, use Table A-3.2.

Table A-3.2: Listing of Related Companies

Name, address, email and telephone of related company in all countries	**List of activities**	**Tick if manufacturer of the subject merchandise** √	**Tick if supplier of input used in the manufacturing of the subject merchandise** √	**Tick if importer of the subject merchandise** √	**Percentage of your company's shareholding in related company**	**Percentage of related company's shareholding in your company**

RESPONSE:

As stated in **Answer A-3.3.a** above, Nam Kim Steel and its related companies only operate in Vietnam. Out of Nam Kim Steel's [xxx] related companies, only [name of affiliated company] aims to produce and sell the product under investigation. However, during the POI, [name of affiliated company] has not yet commenced operations. As such, **Table A-3.2** is not applicable to Nam Kim Steel. This is because, during the investigation period, Nam Kim Steel did not have any related companies involved with the production, sale, R&D, distribution and supply of the subject merchandise.

5. If your company has contractual links/agreement with other company(ies) in Malaysia or other countries (in particular, alleged country(ies) in this

proceeding), for the production (e.g., subcontracting), supply and sale of the product or other licensing, technical patent or compensatory agreements, explain the nature of the agreement and indicate clearly the country where the company is located.

RESPONSE:

Not applicable. Nam Kim Steel does not have any contractual links or agreements with other companies in Malaysia or other countries (particularly the alleged countries in this proceeding) for activities related to the production (such as subcontracting or tolling), supply, and sale of the product, or for any licensing, technical patent, or compensatory agreements.

6. Provide details of any other area of activity where your company has other commercial relationships with the alleged country(ies) under this investigation (e.g., production facilities, joint ventures).

RESPONSE:

Not applicable. Nam Kim Steel does not have any other commercial relationships with the alleged countries in this proceeding, such as production facilities or joint ventures.

SECTION B: PRODUCT DESCRIPTION

This section requests a detailed description of the Like Product and Subject Merchandise produced by your company and related company(ies).

Like Product

The product produced by the producers/exporters sold for consumption in the domestic market of the exporting country. "Like product" means a product which is identical or alike in all respects to the subject merchandise, and may include any other product which has physical, technical or chemical characteristics, application or uses that resemble those of the subject merchandise as the Government deems appropriate.

Subject Merchandise

"Subject merchandise" means the class or kind of merchandise exported or sold for exportation from the exporting country to Malaysia that is the subject of any countervailing or anti-dumping action under Act 504 as determined by the Government to be appropriate for establishing the scope of the action.

B-1 Product Specifications

1. Briefly describe the range of products produced by your company in Table B-1.1

Table B-1.1: Product Range Produced (Actual Production)

Description	**Like Product** *(specify type of product & unit of measurement)*	**Other Products** *(specify type of product & unit of measurement)*
POI Quarter 1		
POI Quarter 2		
POI Quarter 3		
POI Quarter 4		
Total Actual Production		

Note:

i. State unit of measurements e.g., MT, kg, litre, etc.

RESPONSE:

Please refer to **Table B-1.1** below.

Description	Like Product/ Subject Merchandise (GL) Unit: MT (Index)	Other Products (Index)						
		[Name of Other Product] Unit: MT	[Name of Other Product] Unit: MT	[Name of Other Product] Unit: MT	[Name of Other Product] Unit: MT	[Name of Other Product] Unit: MT	[Name of Other Product] Unit: MT	[Name of Other Product] Unit: MT, Piece
POI Quarter 1	100	100	100	100	100	100	100	100
POI Quarter 2	101	110	183	90	123	111	111	109
POI Quarter 3	97	76	266	83	125	91	91	88
POI Quarter 4	82	63	249	68	110	81	82	74
Total Actual Production	**380**	**349**	**799**	**341**	**457**	**383**	**384**	**372**

2. For the production of like product and subject merchandise, provide a detailed narrative and flow chart of the production process, identifying each manufacturing stage. This must be supported by illustrative materials, such as technical brochures and catalogues. Additionally, identify any by-products, co-products, or significant scrap generated.

RESPONSE:

Nam Kim Steel's business model is typical for a flat-rolled coated steel coil manufacturer. The manufacturing process for the PUI exported to Malaysia is exactly the same as that for products sold domestically and exported to other third countries.

[Confidential diagram on production process]

Production process of the PUI is carried out in [xxx] stages:

[***]

Please also refer to **Exhibit B-1.2 – Generation of Scrap During Production_CONF** and **Exhibit A-3.3.e** for Nam Kim Steel's product brochure / catalogue, specifically pages 28-29 for the specifications of the PUI.

[Note: The above information in asterisk and **Exhibit B-1.2** are provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

3. Fully describe the like product and subject merchandise produced by your company as per Table B-1.2.

Table B-1.2: Product Range Produced

Product grade	Physical, technical and chemical characteristics	Brand names	Product specification	International / Industrial standard	End usage

RESPONSE:

Please refer to **Table B-1.2** below.

Product Grade	Physical, technical and chemical characteristics	Brand names	Manufacturer specification	International/ Industrial standard	End usage
[***]	[***]	[***]	[***]	[***]	[***]
[***]	[***]	[***]	[***]	[***]	[***]

[***]	[***]	[***]	[***]	[***]	[***]
[***]	[***]	[***]	[***]	[***]	[***]

Nam Kim Steel does not differentiate the selling price based on [specification]. In other words, the [specification] does not have any impact on the price of the PUI sold. Please refer to **Exhibit B-1.3_International Standard_CONF** for the different standards on physical, technical and chemical characteristics based on countries.

[Note: The above information in asterisk and **Exhibit B-1.3** are provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

4. Supply technical documentation where appropriate. If the products involve a number of models and/or types, the details must cover all models or types produced and/or exported.

RESPONSE:

Please refer to **Exhibit A-3.3.e** for Nam Kim Steel's product brochure / catalogue, specifically pages 28 – 29 for the specifications of the PUI. Please also refer to **Exhibit B-1.3** for the different standards on physical, technical and chemical characteristics based on countries.

5. Describe in detail your company's own product coding system. Provide a key to your product codes, including all prefixes, suffixes, or other notations, which identify special specifications.

RESPONSE:

Nam Kim Steel uses an internal coding system called "[code]" to manage products manufactured and sold in Malaysia, other export markets and the domestic market. This code is also integrated into the company's accounting system (i.e. SAP). The same [code] system is consistently used across the Company's production and purchasing data, allowing the relevant information to be identified and tracked consistently throughout the Company's operations.

The **[code] does not [***]**.

The [code] consists of [xxx] characters and is [***]. The first [xxx] digits of the code represent [***]. In general, Nam Kim's products are classified as follows:

[***]

The [code] for the product under investigation specifically starts from **[xxx]** for **[***]** and from **[xxx]** for **[***]**. In addition, Nam Kim Steel also classifies [***].

As for the remaining [xxx] digits, they are [***].

Please refer to **Exhibit B-1.5.1 – [Code] Description_CONF** for examples on the [code] description and **Exhibit B-1.5.2 – Set Up Rules for [Code]_CONF** to understand the basic setup for the [code].

For details on the process of creating [code] in the SAP system, please refer to **Exhibit B-1.5.3** – **[Code] Management Process_CONF**, which describes the process of creating [code] in SAP, including: [***].

[Note: The above information in asterisk, **Exhibit B-1.5.1, Exhibit B-1.5.2** and **Exhibit B-1.5.3** are provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

6. Briefly explain the comparability of the like product produced by your company with the subject merchandise exported to Malaysia in this proceeding. For this purpose, use Table B-1.3.

Table B-1.3: Product Comparability

Types of Like Product produced by your company *(Include description)*	**Product sales code of Like Product**	**Subject Merchandise** *(Include description)*	**Product sales code of Subject Merchandise**	**Identical Characteristics** *(Specify)*	**Differences** *(Specify)*

RESPONSE:

From the outset, it must be stated that comparing the like product and subject merchandise based solely on the [code] would not be sufficient to ensure a fair, "apple-to-apple" comparison.

Key Product Specifications Impacting Pricing

There are [xxx] main product specifications that impact the pricing of the Product Under Investigation: [***].

Why the [Code] is Insufficient for Fair Product Comparison

In summary, the [code] alone does not allow for a fair "apple-to-apple" comparison of the like product and subject merchandise because:

[***]

Since the [code] does not [***], it cannot be used alone to determine whether the like product and subject merchandise are identical or comparable.

Establishment of the Product Code Number (PCN) System for Fair Comparison of the Like Product and Subject Merchandise

In light of the above, to assist MITI in identifying identical or comparable types / models in both Malaysian and domestic market sales, Nam Kim Steel has established a Product Code Number (PCN) system. This PCN system classifies the like product and subject merchandise based on the following [xxx] main specifications that impact pricing, thus allowing for a fair and commercially meaningful comparison:

[***]

Below is the table for converting the [code] into the Product Code Number (PCN) based on the [xxx] main specifications:

[***]

Nam Kim Steel respectfully invites MITI to compare the like product and subject merchandise based on the PCNs established above, and not based on the [code]. To assist MITI in this regard, Nam Kim Steel has added an additional column, where relevant, in the sales and costing tables to specify the applicable PCN.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information.]

Please refer to **Table B-1.2** below, which sets out the comparability of the like product and subject merchandise manufactured by Nam Kim based on both [code] and PCN.

As MITI will note, [***]. For this reason, Nam Kim Steel respectfully invites MITI to base its comparison of the like product and subject merchandise on the PCN rather than the [code], as this would ensure a fair and commercially meaningful analysis.

Table B-1.2: Product Comparability (Year 1)

Product Code Number (PCN)	**Types of Like Product produced by your company** *(Include description)*	**Product sales code of Like Product**	**Subject Merchandise** *(Include description)*	**Product sales code of Subject Merchandise**	**Identical Characteristics** *(Specify)*	**Differences** *(Specify)*
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Table B-1.2: Product Comparability (Year 2)

Product Code Number (PCN)	Types of Like Product produced by your company *(Include description)*	Product sales code of Like Product	Subject Merchandise *(Include description)*	Product sales code of Subject Merchandise	Identical Characteristics *(Specify)*	Differences *(Specify)*
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Table B-1.2: Product Comparability (POI)

Product Code Number (PCN)	Types of Like Product produced by your company *(Include description)*	Product sales code of Like Product	Subject Merchandise *(Include description)*	Product sales code of Subject Merchandise	Identical Characteristics *(Specify)*	Differences *(Specify)*
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[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information.]

B-2 Comparison of Export and Domestic Products

1. Indicate in Table B-2 all types/grades of the like product sold by your company in the domestic market and the subject merchandise exported into Malaysia in Year 1, Year 2 and POI.

2. Define and distinguish between all different types/grades of the like product and subject merchandise sold by your company to the domestic market and Malaysian market.

Table B-2: Products Comparison

Year	Product sales code	Commercial name of like product in your domestic market	Quantity of like product sold domestically *(specify the unit of measurement)* **(A)**	Commercial name of subject merchandise sold in Malaysia	Quantity of subject merchandise sold in Malaysia *(specify the unit of measurement)* **(B)**	Indicate the quantity of like product sold domestically as % of quantity subject merchandise sold in Malaysia (A/B) x 100%
Year 1						
Year 2						
POI						

Note:

i. State unit of measurements e.g., MT, kg, litre, etc.

RESPONSE:

Please refer to **Table B-2** below for comparison of the PUI sold domestically and exported to Malaysia. As stated in **Answer B-1.6** above, the [code] alone does not allow for fair comparison of the like product and subject merchandise because:

[***]

As such, **Table B-2** is reported using the PCN, which would allow Nam Kim Steel to accurately identify like product and subject merchandise sold which share the [xxx] main product specifications that affect pricing, namely [specifications].

Nam Kim Steel respectfully invites MITI to compare the like product and subject merchandise based on PCN, and not based on the [code]. As the [specification] of the product does not affect pricing, Nam Kim Steel did not consider [specification] in the established PCN.

Table B-2: Products Comparison (Year 1)

Year	Product sales code (PCN)	Commercial name of like product in your domestic market	Quantity of like product sold domestically *(MT)* (A)	Commercial name of subject merchandise sold in Malaysia	Quantity of subject merchandise sold in Malaysia *(MT)* (B)	Quantity of like product sold domestically as % of quantity subject merchandise sold in Malaysia (A/B) x 100%
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GRAND TOTAL			[***]	[***]	[***]	[***]

Table B-2: Products Comparison (Year 2)

Year	Product sales code (PCN)	Commercial name of like product in your domestic market	Quantity of like product sold domestically *(MT)* **(A)**	Commercial name of subject merchandise sold in Malaysia	Quantity of subject merchandise sold in Malaysia *(MT)* **(B)**	Quantity of like product sold domestically as % of quantity subject merchandise sold in Malaysia (A/B) x 100%
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YEAR 2	[***]	[***]	[***]	[***]	[***]	[***]
YEAR 2	[***]	[***]	[***]	[***]	[***]	[***]
YEAR 2	[***]	[***]	[***]	[***]	[***]	[***]

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YEAR 2	[***]	[***]	[***]	[***]	[***]	[***]
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YEAR 2	[***]	[***]	[***]	[***]	[***]	[***]
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YEAR 2	[***]	[***]	[***]	[***]	[***]	[***]
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YEAR 2	[***]	[***]	[***]	[***]	[***]	[***]
YEAR 2	[***]	[***]	[***]	[***]	[***]	[***]
YEAR 2	[***]	[***]	[***]	[***]	[***]	[***]
GRAND TOTAL			[***]	[***]	[***]	[***]

Table B-2: Products Comparison (POI)

Year	Product sales code (PCN)	Commercial name of like product in your domestic market	Quantity of like product sold domestically *(MT)* **(A)**	Commercial name of subject merchandise sold in Malaysia	Quantity of subject merchandise sold in Malaysia *(MT)* **(B)**	Quantity of like product sold domestically as % of quantity subject merchandise sold in Malaysia (A/B) x 100%
POI	[***]	[***]	[***]	[***]	[***]	[***]
POI	[***]	[***]	[***]	[***]	[***]	[***]
POI	[***]	[***]	[***]	[***]	[***]	[***]
POI	[***]	[***]	[***]	[***]	[***]	[***]
POI	[***]	[***]	[***]	[***]	[***]	[***]
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POI	[***]	[***]	[***]	[***]	[***]	[***]
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POI	[***]	[***]	[***]	[***]	[***]	[***]
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POI	[***]	[***]	[***]	[***]	[***]	[***]
POI	[***]	[***]	[***]	[***]	[***]	[***]
POI	[***]	[***]	[***]	[***]	[***]	[***]
POI	[***]	[***]	[***]	[***]	[***]	[***]
GRAND TOTAL			[***]	[***]	[***]	[***]

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

B-3 Format of Submission

1. Complete Table B-3 showing information that will allow establishing a relationship between the types of the like product and subject merchandise which were sold in the domestic market and/or the Malaysian market for Year 1, Year 2 and POI. For this purpose, use Excel format as per Table B-3.

   a. Products sold in domestic and export market which have no difference (physical or other) are classified as "identical". Establishing a relationship between these products is straightforward and requires no information in field PDT-DIFF.

   b. If a product sold in one of the markets is not "identical" to a product sold in the other market, but closely resembles and can be compared with another product, then it is classified as "comparable". In this case, provide a short description of these differences in field PDT-DIFF. Be aware that detailed explanation of these differences (as well as their market value) will be necessary when answering the section regarding "allowances".

   c. In case a certain product type was only sold in one of the markets (domestic or Malaysian), provide details of "product description" in field PDT-DES.

Table B-3: Product Specification (PDT-SPEC)

Field name	Field description	Explanation
DM-PDCOD	DM production code	Production code of the like product, as used for production purposes for products produced for the domestic market
DM-SLCOD	DM product sales code	Product sales code of the like product, as used in your records for products produced for the domestic market
DM-IS	DM International/ Industrial Standard	International or industrial standard of the like product produced for the domestic market
DM-QTY	DM net quantity sold	Net quantity of domestic sales after all credit/debit notes adjustments, including the sales return and all other applicable adjustments as recorded in your accounting records (specify the unit of measurement used).
DM-VAL	DM net sales value	Net value of domestic sales after all credit/debit notes adjustments, including the sales discounts, sales returns, sales tax/VAT and all other applicable

Field name	Field description	Explanation
		adjustments as recorded in your accounting records (specify the currency used)
MY-PDCOD	MY production code	Production code of the subject merchandise, as used for production purposes for products produced for the Malaysian market
MY-SLCOD	MY product sales code	Product sales code of the subject merchandise, as used in your records for products produced for the Malaysian market
MY-IS	MY International/ Industrial Standard	International or industrial standard of the subject merchandise produced for the Malaysia market
MY-QTY	MY net quantity sold	Net quantity of export sales to Malaysia after all credit/debit notes adjustments, including the sales return and all other applicable adjustments as recorded in your accounting records of the product type. (specify the unit of measurement used).
MY-VAL	MT net sales value	Net value of export sales to Malaysia after all credit/debit notes adjustments, including the sales discounts, sales returns, sales tax/VAT and all other applicable adjustments as recorded in your accounting records (specify currency used)
PDT-DES	Product description	Product description of the like product/subject merchandise
PDT-CLASS	Product classification	Product classification (Prime or Non-Prime) according to producer/exporter
PDT-GRADE	Product grade	Product grade of the like product/subject merchandise
PDT-SPEC	Product specification	Product specification of the like product/subject merchandise
H.S.	H.S. codes	Indicate the Harmonized System Codes of this particular product type
PDT-COMP	Product comparison	“I” for identical product, and “C” for comparable product

Field name	Field description	Explanation
PDT-DIFF	Product differences	Short description of the differences (physical or other) between the “comparable” type/model

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RESPONSE:

To compare the subject merchandise and like product between the two markets, as mentioned in **Answer B-1.6** above, we have established the Product Code Number (**PCN**) system. Therefore, we have added a column in **Table B-3** to report the applicable PCN for each [code]. The specific [code] are reported in the columns for product sales code in **Table B-3**.

Please refer to **Table B-3 (PDT-SPEC)**.

SECTION C: OPERATION

C-1 Production and Capacity

1. Complete Table C-1 and provide and explain information concerning the production capacity, actual production and capacity utilisation of the like product and subject merchandise produced by your company.

Table C-1: Production and Capacity Utilisation

Year		Description		
		Production capacity in volume *(specify the unit of measurement)* **(A)**	**Actual production in volume** *(specify the unit of measurement)* **(B)**	**Capacity Utilisation (%) (B/A) x 100**
Year 1	**Q1**			
	Q2			
	Q3			
	Q4			
Total				
Year 2	**Q1**			
	Q2			
	Q3			
	Q4			
Total				
POI	**Q1**			
	Q2			
	Q3			
	Q4			
Total				

RESPONSE:

Please refer to **Table C-1** below for the production capacity, actual production and capacity utilisation of the like product and subject merchandise produced by Nam Kim Steel in Year 1, Year 2 and POI.

Year		Description (Index)		
		Production capacity in volume *(MT)* (A)	Actual production in volume *(MT)* (B)	Capacity Utilisation (%) (B/A) x 100
Year 1	Q1	100	100	100
	Q2	100	100	98
	Q3	100	95	94
	Q4	100	85	85
Total		**100**	**100**	**100**
Year 2	Q1	100	100	98
	Q2	100	121	119
	Q3	100	107	106
	Q4	100	125	124
Total		**100**	**119**	**121**
POI	Q1	100	76	76
	Q2	100	76	76
	Q3	100	73	73
	Q4	100	62	61
Total		**100**	**76**	**76**

2. State the basis of determining the company's installed and effective production capacity. (i.e., number of shifts, working days per year, idle time of machinery for maintenance, changes in the production process, etc.). Additionally, the company should explain any significant changes in the production process or facility upgrades during the period of investigation that have impacted the overall capacity levels.

RESPONSE:

The production capacity is calculated based on technical materials from suppliers of the production line, which is mainly proposed based on [***]. The appropriate idle time for machinery maintenance is [***].

Thus, Nam Kim Steel will arrange working shifts and production schedules based on the above-mentioned production capacity, taking into account actual demand from the sales department, availability of material and existing labour force.

Please refer to **Exhibit C-1.2 – Production Capacity_CONF** for documents on production capacity calculation.

During the POI, there were no significant changes in the production process or facility upgrades that have impacted the overall capacity levels.

[Note: The above information in asterisk and **Exhibit C-1.2** are provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business

information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

3. If your company produces other products on the same production equipment and machinery used for the production of product, provide a comprehensive list of these products. For each shared asset, explain the **basis for allocation** (e.g., machine hours, production volume, or labour hours) used to distinguish the costs and capacities associated specifically with the like product and subject merchandise.

RESPONSE:

There is [xxx] coating line of Nam Kim Steel which is designed for mixed production, capable of producing [xxx] finished products: [products]. Therefore, in addition to the subject merchandise and like product, we can also produce [products] in this production line.

The production capacity is designed for coated steel coils in general, without specifying any particular type. This is switchable based on customer's production orders, by changing the [***] in the coating line.

Please note that the production capacity in **Table C-1** is reported based on overall capacity of the lines because the production capacity is designed for coated steel coils in general.

Specifically, if we produce the subject merchandise and like product, we use [***]. However, if we produce [products], we use [***] instead.

For production costs incurred during the manufacturing process, such as [costs] and other related costs, Nam Kim allocates these costs based on the [***] of each of these [xxx] products.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

4. Provide full details of future plans to commence production or increase capacity in the exporting country, in Malaysia or in third countries (countries other than Malaysia).

RESPONSE:

Nam Kim Steel itself does not have any plans to commence production or increase production capacity in the exporting country, Malaysia, or any third country.

For one of our affiliated companies – [name of affiliated company], we plan to [***].

However, during the POI, this plant had not yet commenced operations. Accordingly, no orders had been produced or sold by [name of affiliated company] to the domestic market, Malaysia, or any other markets during the POI.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

5. Please indicate the average scrap/waste ratio resulting from the production process of the like product and subject merchandise.

RESPONSE:

Nam Kim aims to produce prime quality products to optimize production costs. However, production incidents may occur during the manufacturing process, which may result in the generation of scrap. Accordingly, the scrap rate is determined based on [***]. Nam Kim [***].

Please refer **Exhibit C-1.5 – Scrap Calculation_CONF** for our detailed response.

[Note: The above information in asterisk and **Exhibit C-1.5** are provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

C-2 Inventories

1. Complete Table C-2 showing the volumes and values of finished goods inventories of the like product and subject merchandise.

Table C-2: Inventories

Year / Quarter	Quantity *(Specify unit of measurement)* / Value *(Specify currency)*	Description						
		Opening inventories	(+) Purchases	(+) Production	(-) Sales /COGS	Captive use*	Other movements	Closing inventories
Year 1 /Q1	Quantity							
	Value							
Year 1 /Q2	Quantity							
	Value							
Year 1 /Q3	Quantity							
	Value							
Year 1 /Q4	Quantity							
	Value							
Year 1	Quantity							
	Value							
Year 2 /Q1	Quantity							
	Value							
Year 2 /Q2	Quantity							
	Value							
Year 2 /Q3	Quantity							
	Value							
Year 2 /Q4	Quantity							

Year / Quarter	Quantity *(Specify unit of measurement)* / Value *(Specify currency)*	Description						
		Opening inventories	(+) Purchases	(+) Production	(-) Sales /COGS	Captive use*	Other movements	Closing inventories
	Value							
Year 2	Quantity							
	Value							
POI /Q1	Quantity							
	Value							
POI /Q2	Quantity							
	Value							
POI /Q3	Quantity							
	Value							
POI /Q4	Quantity							
	Value							
POI	Quantity							
	Value							

** Captive use = internal consumption*

Note: Purchases mean all purchases of the like product and subject merchandise in a finished state. Minor alterations to the purchased product (e.g., repacking) before resale do not normally affect the consideration of such purchases as a finished product.

RESPONSE:

Please refer to **Table C-2** below.

Year / Quarter	Quantity / Value	Description (Index)							
		Opening Inventories	(+) Purchases	(+) Production	(+) Other Input	(-) Sales /COGS	Captive Use*	Other Movements	Closing Inventories
Year 1 /Q1	Quantity (MT)	100	-	100	100	100	100	100	100
	Value (VND)	100	-	100	100	100	100	100	100
Year 1 /Q2	Quantity (MT)	135	-	100	112	115	354	113	97
	Value (VND)	125	-	101	113	118	355	112	96
Year 1 /Q3	Quantity (MT)	131	-	95	136	110	585	130	85
	Value (VND)	120	-	91	133	108	567	123	81
Year 1 /Q4	Quantity (MT)	115	-	85	92	121	307	90	69
	Value (VND)	101	-	82	90	116	291	86	65
Year 1	**Quantity (MT)**	**100**	**-**	**100**	**100**	**100**	**100**	**100**	**100**
	Value (VND)	**100**	**-**	**100**	**100**	**100**	**100**	**100**	**100**
Year 2 /Q1	Quantity (MT)	93	-	100	125	126	683	116	64
	Value (VND)	81	-	95	122	122	659	108	60
Year 2 /Q2	Quantity (MT)	87	-	121	155	144	686	137	77
	Value (VND)	75	-	118	151	141	653	130	72
Year 2 /Q3	Quantity (MT)	104	-	107	143	128	682	129	79
	Value (VND)	89	-	103	141	128	627	123	71
Year 2 /Q4	Quantity (MT)	107	-	125	174	130	509	153	106
	Value (VND)	88	-	114	160	120	450	137	92

Year 2	**Quantity (MT)**	**93**	-	**119**	**136**	**118**	**190**	**123**	**154**
	Value (VND)	**81**	-	**115**	**131**	**115**	**182**	**118**	**141**
POI /Q1	**Quantity (MT)**	143	-	76	114	87	439	117	78
	Value (VND)	115	-	70	106	81	380	105	69
POI /Q2	**Quantity (MT)**	106	-	76	90	73	419	102	67
	Value (VND)	85	-	69	82	67	375	90	59
POI /Q3	**Quantity (MT)**	91	-	73	99	68	211	104	63
	Value (VND)	74	-	69	92	64	186	94	56
POI /Q4	**Quantity (MT)**	84	-	62	96	65	244	94	53
	Value (VND)	69	-	60	91	62	210	87	49
POI	**Quantity (MT)**	**143**	-	**76**	**91**	**66**	**98**	**96**	**78**
	Value (VND)	**115**	-	**72**	**85**	**62**	**88**	**89**	**74**

2. Please explain the captive use and any other movements (if any) of the like product and subject merchandise produced by your company, including the quantities involve and values (e.g., transfers, internal consumption, samples, write-offs, or other disposals).

RESPONSE:

Table C-2 is prepared based on our inventory report. In this table, we report "Captive Use" for [***]. We have also added the "Other Input" column, which is calculated using the formula: [***].

Since [***], "Other Input" refers to [***].

Meanwhile, "Other Movements" column can be understood as "Other Output", which partly consist of [***] and partly of [***]. The formula is expressed as: [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

C-3 Employment

1. Complete Table C-3 and provide information relating to the number of people employed in your company.

Table C-3: Employment

Year / Quarter		Description				
		Total personnel employed	Personnel employed in the production process of like product/ subject merchandise (A)	Personnel employed in sales, general and administration of like product/ subject merchandise (B)	Total personnel employed in the production of like product/ subject merchandise (C = A+B)	% of personnel relative to total personnel employed in Year 1 (e.g.: (C/C in Year 1 x 100)
Year 1	Q1					
	Q2					
	Q3					
	Q4					
End of Year 1						
Year 2	Q1					
	Q2					
	Q3					
	Q4					
End of Year 2						
POI	Q1					

Year / Quarter		Description				
		Total personnel employed	Personnel employed in the production process of like product/ subject merchandise (A)	Personnel employed in sales, general and administration of like product/ subject merchandise (B)	Total personnel employed in the production of like product/ subject merchandise (C = A+B)	% of personnel relative to total personnel employed in Year 1 (e.g.: (C/C in Year 1 x 100)
	Q2					[redacted]
	Q3					
	Q4					
End of POI						

RESPONSE:

Please refer to **Table C-3** below:

Year / Quarter		Description (Index)				
		Total personnel employed	Personnel employed in the production process of like product/ subject merchandise (A)	Personnel employed in sales, general and administration of like product/ subject merchandise (B)	Total personnel employed in the production of like product/ subject merchandise (C = A+B)	% of personnel relative to total personnel employed in Year 1 (e.g.: (C/C in Year 1 x 100)
Year 1	Q1	100	100	100	100	[redacted]
	Q2	101	101	96	99	
	Q3	102	94	111	102	
	Q4	101	89	121	103	
End of Year 1		100	100	100	100	**100**
Year 2	Q1	101	90	114	101	[redacted]
	Q2	108	94	132	111	
	Q3	108	104	125	113	
	Q4	109	106	136	119	
End of Year 2		**106**	**103**	**118**	**110**	**100**
POI	Q1	110	89	105	96	[redacted]
	Q2	107	86	89	87	
	Q3	103	103	82	94	
	Q4	95	106	95	101	
End of POI		**103**	**100**	**87**	**94**	**90**

2. If it is not possible to attribute the number of personnel employed directly to the like product, allocation should be made. Clearly explain the basis of the allocation.

RESPONSE:

For personnel involved in production activities, [***].

For personnel involved in sales activities, [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

3. Explain if:

   a. workers have been temporarily out of work; or

   b. your company had to introduce reduced working hours.

RESPONSE:

Not applicable. During the POI, Nam Kim did not have any workers who were temporarily out of work, nor did the Company implement any reduced working hours.

C-4 Investments

1. Complete Table C-4 showing investments made by your company. Figures should be provided for the net investment made each year and an estimate of the allocation to the like product.

2. Please indicate whether the investments are replacement or new investments.

Table C-4: Investment for the Like Product and Subject Merchandise

Description	**Year 1** *(specify currency)*				
	Quarter 1	**Quarter 2**	**Quarter 3**	**Quarter 4**	**Total**
Total Company Investments (All products)					
Total investments for the like product and subject merchandise (if any) of which:					
Capital:					
• Buildings					
• Machinery & Equipment					
• Other *(specify)*					

Non-Capital:					
• R&D					
• Other *(specify)*					

Description	Year 2 *(specify currency)*				
	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Total Company Investments (All products)					
Total investments for the like product and subject merchandise (if any) of which:					
Capital: • Buildings • Machinery & Equipment • Other *(specify)*					
Non-Capital: • R&D • Other *(specify)*					

Description	POI *(specify currency)*				
	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Total Company Investments (All products)					
Total investments for the like product and subject merchandise (if any) of which:					
Capital: • Buildings • Machinery & Equipment • Other *(specify)*					
Non-Capital: • R&D • Other *(specify)*					

RESPONSE:

Please refer to **Table C-4** below:

Description	Year 1 (VND) (Index)				
	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Total Company Investments (All products)	100	13	77	107	100

Total investments for the like product and subject merchandise (if any) of which:	-	100	31	-	100
Capital: • Buildings • Machinery & Equipment • Other *(specify)*	[***] [***] [***]	[***] [***] [***]	[***] [***] [***]	[***] [***] [***]	[***] [***] [***]
Non-Capital: • R&D • Other *(specify)*	[***] [***]	[***] [***]	[***] [***]	[***] [***]	[***] [***]

Description	**Year 2** (VND) (Index)				
	Quarter 1	**Quarter 2**	**Quarter 3**	**Quarter 4**	**Total**
Total Company Investments (All products)	101	9	125	12	83
Total investments for the like product and subject merchandise (if any) of which:	2,670	38	4,284	119	5,434
Capital: • Buildings • Machinery & Equipment • Other *(specify)*	[***] [***] [***]	[***] [***] [***]	[***] [***] [***]	[***] [***] [***]	[***] [***] [***]
Non-Capital: • R&D • Other *(specify)*	[***] [***]	[***] [***]	[***] [***]	[***] [***]	[***] [***]

Description	**POI** (VND) (Index)				
	Quarter 1	**Quarter 2**	**Quarter 3**	**Quarter 4**	**Total**
Total Company Investments (All products)	16	24	10	22	24
Total investments for the like product and subject merchandise (if any) of which:	180	-	583	191	729
Capital: • Buildings • Machinery & Equipment • Other *(specify)*	[***] [***] [***]	[***] [***] [***]	[***] [***] [***]	[***] [***] [***]	[***] [***] [***]
Non-Capital: • R&D • Other *(specify)*	[***] [***]	[***] [***]	[***] [***]	[***] [***]	[***] [***]

[Note: The exact categorisation of investment is confidential, legal and proprietary information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's corporate and business information.]

C-5 Sales Reconciliation

1. Complete Table C-5 on the sales reconciliation for like product, subject merchandise and all products. For this purpose, use Excel format as per Table C-5.

2. Your reconciliation must provide relevant supporting documentation (e.g., financial statements, trial balance, relevant excerpts from general ledger, sub-ledger, etc.) for each step in the reconciliation.

Table C-5: Sales Reconciliation for the All Products

Year 1 / Year 2 / POI			
Description	**Quantity** *(specify unit of measurement)*	**Value** *(specify currency)*	**Source documents**
Revenue in Income Statement (as per audited report)			
Variance			Please provide an explanation of the variance
Total sales of all products during accounting period			
Difference between sales during Year 1 / Year 2 / POI and accounting periods as per your management accounts			Please provide the reconciliation evidence for the difference as an appendix
Total sales of all products during Year 1 / Year 2 / POI as stated in your management accounts			
Variance			Please provide an explanation of the variance
Summary of all products sold			
• Like product / Subject merchandise			
• Other product A			
• Other product B			
• Other product C (add new lines as required)			

Year 1 / Year 2 / POI			
Description	**Quantity** *(specify unit of measurement)*	**Value** *(specify currency)*	**Source documents**
Like product and subject merchandise (purchased and produced)			
• Sales in domestic market			
• Sales in Malaysia			
• Sales in other countries			
Sales of own production of like product and subject merchandise			
• Sales in domestic market			
• Sales in Malaysia			
• Sales in other countries			
Resales (purchased) of like product and subject merchandise			
• Sales in domestic market			
• Sales in Malaysia			
• Sales in other countries			

Please refer to **Table C-5 (SALES RECON)**. Please also refer to **Exhibit F-1.1 – AFS_CONF** for Nam Kim Steel's audited separate financial statements from Year 1 to POI.

[Note: **Exhibit F-1.1** is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

C-6 Sales Turnover

1. In Table C-6, provide the details of total sales turnover of your company (after deducting all credit/debit notes adjustments, including the sales discounts, sales returns, sales tax/VAT and all other applicable adjustments).

Table C-6: Turnover

Year / Quarter		Description			
		Total turnover *(all products) (specify currency)* **(A+B+C)**	**Turnover of the like product and subject merchandise** *(produced) (specify currency)* **(A)**	**Turnover of the like product and subject merchandise** *(purchased) (specify currency)* **(B)**	**Turnover of other product** *(specify currency and type of products)* **(C)**
Year 1	**Q1**				
	Q2				
	Q3				
	Q4				
Total					
Year 2	**Q1**				
	Q2				
	Q3				
	Q4				
Total					
POI	**Q1**				
	Q2				
	Q3				
	Q4				
Total					

RESPONSE:

Please refer to **Table C-6** below.

Year / Quarter		Description (Index)			
		Total turnover (all products) (VND) **(A+B+C)**	**Turnover of the like product and subject merchandise** (produced) (VND) **(A)**	**Turnover of the like product and subject merchandise (purchased)** (VND) **(B)**	**Turnover of other product** (VND) **(C)**
Year 1	**Q1**	100	100	-	100
	Q2	127	124	-	128
	Q3	99	109	-	96
	Q4	100	119	-	95
Total		**100**	**100**	**-**	**100**
Year 2	**Q1**	122	131	-	119
	Q2	131	150	-	126
	Q3	121	132	-	118
	Q4	103	122	-	98
Total		**112**	**118**	**-**	**110**
POI	**Q1**	93	82	-	96
	Q2	89	66	-	95
	Q3	87	61	-	95
	Q4	72	59	-	75
Total		**80**	**59**	**-**	**86**

C-7 Sales Volume and Value

1. By using format in Table C-7.1 and C-7.2, provide separate tables of information on net sales (in volumes and value) (after deducting all credit/debit notes adjustments, including the sales discounts, sales returns, sales tax/VAT and all other applicable adjustments:

   a. Sales of the like product and subject merchandise **produced** by your company and resale of **purchased** of the like product and subject merchandise to **unrelated** parties.

   b. Sales of the like product and subject merchandise **produced** by your company and resale of **purchased** of the like product and subject merchandise to **related** parties.

Table C-7.1: Sales of the Like Product and Subject Merchandise (Unrelated)

Year / Quarter	**Quantity** *(Specify unit of measurement)* **/ Value** *(Specify currency)*	**Description**							
		Sales in domestic market		**Sales in Malaysia**		**Sales in other countries**		**Total sales**	
		Purchased	**Produced**	**Purchased**	**Produced**	**Purchased**	**Produced**	**Purchased**	**Produced**
Year 1 / Q1	Quantity								
	Value								
Year 1 / Q2	Quantity								
	Value								
Year 1 / Q3	Quantity								
	Value								
Year 1 / Q4	Quantity								
	Value								
Total	Quantity								
	Value								

Year / Quarter	**Quantity** *(Specify unit of measurement)* **/ Value** *(Specify currency)*	**Description**							
		Sales in domestic market		**Sales in Malaysia**		**Sales in other countries**		**Total sales**	
		Purchased	**Produced**	**Purchased**	**Produced**	**Purchased**	**Produced**	**Purchased**	**Produced**
Year 2 / Q1	Quantity								
	Value								
Year 2 / Q2	Quantity								
	Value								
Year 2 / Q3	Quantity								
	Value								
Year 2 / Q4	Quantity								
	Value								
Total	Quantity								
	Value								
POI / Q1	Quantity								
	Value								
POI / Q2	Quantity								
	Value								
POI / Q3	Quantity								
	Value								
POI / Q4	Quantity								
	Value								
Total	Quantity								
	Value								

Table C-7.2: Sales of the Like Product and Subject Merchandise (Related)

Year / Quarter	**Quantity** *(Specify unit of measurement)* **/ Value** *(Specify currency)*	**Description**							
		Sales in domestic market		**Sales in Malaysia**		**Sales in other countries**		**Total sales**	
		Purchased	**Produced**	**Purchased**	**Produced**	**Purchased**	**Produced**	**Purchased**	**Produced**
Year 1 / Q1	Quantity								
	Value								
Year 1 / Q2	Quantity								
	Value								
Year 1 / Q3	Quantity								
	Value								
Year 1 / Q4	Quantity								
	Value								
Total	Quantity								
	Value								
Year 2 / Q1	Quantity								
	Value								
Year 2 / Q2	Quantity								
	Value								
Year 2 / Q3	Quantity								
	Value								
Year 2 / Q4	Quantity								
	Value								
Total	Quantity								
	Value								

Year / Quarter	**Quantity** *(Specify unit of measurement)* **/ Value** *(Specify currency)*	**Description**							
		Sales in domestic market		**Sales in Malaysia**		**Sales in other countries**		**Total sales**	
		Purchased	**Produced**	**Purchased**	**Produced**	**Purchased**	**Produced**	**Purchased**	**Produced**
POI / Q1	Quantity								
	Value								
POI / Q2	Quantity								
	Value								
POI / Q3	Quantity								
	Value								
POI / Q4	Quantity								
	Value								
Total	Quantity								
	Value								

RESPONSE:

Please refer to **Table C-7.1** below for sales of the like product and subject merchandise to unrelated parties.

Year / Quarter	Quantity (MT) / Value (VND)	Description (Index)							
		Sales in domestic market		Sales in Malaysia		Sales in other countries		Total sales	
		Purchased	Produced	Purchased	Produced	Purchased	Produced	Purchased	Produced
Year 1 / Q1	Quantity (MT)	-	100	-	100	-	100	-	100
	Value (VND)	-	100	-	100	-	100	-	100
Year 1 / Q2	Quantity (MT)	-	80	-	142	-	154	-	115
	Value (VND)	-	79	-	160	-	178	-	124
Year 1 / Q3	Quantity (MT)	-	81	-	105	-	143	-	110
	Value (VND)	-	72	-	114	-	154	-	109
Year 1 / Q4	Quantity (MT)	-	93	-	122	-	152	-	121
	Value (VND)	-	80	-	127	-	166	-	119
Total	**Quantity (MT)**	**-**	**100**	**-**	**100**	**-**	**100**	**-**	**100**
	Value (VND)	**-**	**100**	**-**	**100**	**-**	**100**	**-**	**100**
Year 2 / Q1	Quantity (MT)	-	90	-	5	-	173	-	126
	Value (VND)	-	82	-	5	-	196	-	131
Year 2 / Q2	Quantity (MT)	-	106	-	86	-	189	-	144
	Value (VND)	-	97	-	94	-	217	-	150

Year 2 / Q3	Quantity (MT)	-	82	-	24	-	185	-	128
	Value (VND)	-	74	-	23	-	207	-	132
Year 2 / Q4	Quantity (MT)	-	117	-	7	-	151	-	130
	Value (VND)	-	100	-	8	-	153	-	122
Total	**Quantity (MT)**	**-**	**112**	**-**	**26**	**-**	**127**	**-**	**118**
	Value (VND)	**-**	**106**	**-**	**26**	**-**	**129**	**-**	**118**
POI / Q1	Quantity (MT)	-	79	-	26	-	100	-	87
	Value (VND)	-	70	-	28	-	99	-	82
POI / Q2	Quantity (MT)	-	84	-	25	-	62	-	73
	Value (VND)	-	73	-	23	-	59	-	66
POI / Q3	Quantity (MT)	-	71	-	42	-	65	-	68
	Value (VND)	-	60	-	41	-	63	-	61
POI / Q4	Quantity (MT)	-	61	-	35	-	71	-	65
	Value (VND)	-	51	-	33	-	70	-	59
Total	**Quantity (MT)**	**-**	**84**	**-**	**27**	**-**	**54**	**-**	**66**
	Value (VND)	**-**	**76**	**-**	**25**	**-**	**49**	**-**	**59**

Please refer to **Table C-7.2** below for sales of the like product and subject merchandise to related parties.

Year / Quarter	Quantity (MT) / Value (VND)	Description (Index)							
		Sales in domestic market		Sales in Malaysia		Sales in other countries		Total sales	
		Purchased	Produced	Purchased	Produced	Purchased	Produced	Purchased	Produced
Year 1 / Q1	Quantity (MT)	-	-	-	-	-	-	-	-
	Value (VND)	-	-	-	-	-	-	-	-
Year 1 / Q2	Quantity (MT)	-	-	-	-	-	-	-	-
	Value (VND)	-	-	-	-	-	-	-	-
Year 1 / Q3	Quantity (MT)	-	-	-	-	-	-	-	-
	Value (VND)	-	-	-	-	-	-	-	-
Year 1 / Q4	Quantity (MT)	-	-	-	-	-	-	-	-
	Value (VND)	-	-	-	-	-	-	-	-
Total	**Quantity (MT)**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
	Value (VND)	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Year 2 / Q1	Quantity (MT)	-	-	-	-	-	-	-	-
	Value (VND)	-	-	-	-	-	-	-	-
Year 2 / Q2	Quantity (MT)	-	-	-	-	-	-	-	-
	Value (VND)	-	-	-	-	-	-	-	-
Year 2 / Q3	Quantity (MT)	-	-	-	-	-	-	-	-
	Value (VND)	-	-	-	-	-	-	-	-
Year 2 / Q4	Quantity (MT)	-	-	-	-	-	-	-	-
	Value (VND)	-	-	-	-	-	-	-	-
Total	**Quantity (MT)**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
	Value (VND)	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
POI / Q1	Quantity (MT)	-	-	-	-	-	-	-	-
	Value (VND)	-	-	-	-	-	-	-	-
POI / Q2	Quantity (MT)	-	-	-	-	-	-	-	-
	Value (VND)	-	-	-	-	-	-	-	-

POI / Q3	Quantity (MT)	-	-	-	-	-	-	-	-
	Value (VND)	-	-	-	-	-	-	-	-
POI / Q4	Quantity (MT)	-	100	-	-	-	-	-	100
	Value (VND)	-	100	-	-	-	-	-	100
Total	**Quantity (MT)**	**-**	**100**	**-**	**-**	**-**	**-**	**-**	**100**
	Value (VND)	**-**	**100**	**-**	**-**	**-**	**-**	**-**	**100**

C-8 Profitability

1. Complete Table C-8.1 and C-8.2 on your sales transactions for like product, subject merchandise and all products. For this purpose, use Excel format as per Table C-8.1 and C-8.2.

Table C-8.1: Profitability (Like Product and Subject Merchandise)

Description	Year 1 / Year 2 / POI *(specify currency)*														
	Quarter 1			Quarter 2			Quarter 3			Quarter 4			Total		
	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries
Gross Sales															
Less:															
Sales return															
Sales discount															
Net Sales															
Less:															
Cost of Goods Sold															
Gross Profit															
Add:															
Other Income															
Less:															
Selling, General and Administrative Expenses															
Financial Expenses															
Other Expense (specify)															
Profit Before Tax															
Tax Expense															
Profit After Tax															

Description	Year 1 / Year 2 / POI *(specify currency)*														
	Quarter 1			Quarter 2			Quarter 3			Quarter 4			Total		
	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries
Net Profit Margin (%)															

Table C-8.2: Profitability (All Products)

Description	Year 1 / Year 2 / POI *(specify currency)*														
	Quarter 1			Quarter 2			Quarter 3			Quarter 4			Total		
	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries
Gross Sales															
Less:															
Sales return															
Sales discount															
Net Sales															
Less:															
Cost of Goods Sold															
Gross Profit															
Add:															
Other Income															
Less:															
Selling, General and Administrative Expenses															
Financial Expenses															
Other Expense (specify)															

Description	Year 1 / Year 2 / POI *(specify currency)*														
	Quarter 1			Quarter 2			Quarter 3			Quarter 4			Total		
	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries	Domestic	Export to Malaysia	Export to Other Countries
Profit Before Tax															
Tax Expense															
Profit After Tax															
Net Profit Margin (%)															

RESPONSE:

Please refer to **Table C-8.1 (SM_LP_PROF)** and **Table C-8.2 (ALL PROF)**.

SECTION D: DOMESTIC SALES OF THE LIKE PRODUCT

This section requests the details of all your sales of the like product in your domestic market for Year 1, Year 2 and POI. In particular, provide your prices and pricing methods for these sales.

Please note that every invoice line of the like product should be reported as a separate transaction. In order to determine which sales fall within the Year 1, Year 2 and POI, ***the invoice date should be used as the date of sale****.*

D-1 General Information

1. Explain your company's **channels of distribution** in the domestic market starting from the factory gate up to sales transaction to each class of customers (e.g., producers, distributors, wholesales, retailers), including related companies. Include a detailed **flow chart** indicating terms of sale and pricing. Explain the basis of your **categorisation of customers**.

RESPONSE:

We offer various sales terms for specific customers, which include [***].

The basic sale terms used in domestic transaction are classified as follows: [***].

Nam Kim Steel does not differentiate the terms of sale and pricing based on customer categorization.

Nam Kim Steel categorizes customers based on their business function, essentially dividing them into [xxx] main groups:

[***]

Below is the customer categorization flowchart for Nam Kim Steel regarding the sale of like products in the domestic market:

[Confidential flowchart on customer categorisation]

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

2. Provide **detailed description of how sales are made**, indicating the procedure followed between time of order and delivery to the first customer. A **full explanation** of how the **invoicing** and **payment** is made should be given. Provide a separate sample **chronological flowchart** detailing every

step in this process. Indicate the **average time frame** within which each step takes place. Please **differentiate** the sales process made through between **related** and **unrelated** companies.

RESPONSE:

For unrelated customers, a sale will start with information provided by the customer for a fresh demand. The appointed salesperson will continue discussing with the customer, and after several rounds of negotiation, will conclude the details on [***]; which will then be indicated in the [***]. Sales to unrelated customers is made [***] terms.

After the [***], the [***] will be requested to proceed within [xxx] working days; and production order will be finished right afterward.

The gap between time of order and delivery to the customer will depend on the required specifications of the like product, combined with appointed production line; but it is often [***]. If customer's demand is for available goods at Nam Kim's warehouse, a production order is not required.

The [***] will be issued to the customer once the material is picked up from Nam Kim Steel's factory yard, and the payment must be made in full by [***].

[Confidential domestic sales flowchart]

For related customers, there is only one related customer – [name of related customer], who will purchase the like product under [***] terms during the POI.

Please refer to **Exhibit D-1.2 – Internal Sales Process_CONF** for a detailed flowchart of the sales process between Nam Kim Steel and its related customer.

[Note: The above information in asterisk and **Exhibit D-1.2** are provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

3. Describe each step in the sales negotiation process, from the first point of contact with the purchaser up to any aftersales price adjustments. If this sales process differs between classes of customers, describe each variation separately.

RESPONSE:

All local customers of Nam Kim Steel are [***]. Thus, a sale begins with information provided by the customer for a fresh demand. A salesman will make a price offer and continue negotiating with customers based on detailed specifications of [***].

The selling prices of Nam Kim Steel's steel products are determined not only by [***]. The final price shall be approved by [***].

The sales negotiation process does not differ between customer categories.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

4. Explain whether production begins after the customers have established their product specifications (contract) and the sale has been made, or pursuant to normal company production schedules.

RESPONSE:

Nam Kim Steel produces like products to [***].

Production begins after [***].

Nam Kim Steel also [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

5. If your sales are made pursuant to contract (either long-term or short-term), describe in detail the process by which the contract, the prices and quantities are agreed to. Describe each of the types of contracts applicable to the like product, including the terms the requirements for a price charge or re-negotiation by either side, etc. Explain any commitments on either party, should the contract be terminated prematurely.

RESPONSE:

For the domestic market, Nam Kim enters into [***] with certain customers, which set out [***]. Based on these [***], the parties will enter into [***].

For other domestic customers, Nam Kim [***]. Sales are made based on [***], under which the parties agree on [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

6. Provide copies of all price lists issued or in use for Year 1, 2 and POI for all domestic market customers, including those used by related companies. Explain how these price lists are used to establish the final sales price to the individual customers and whether sales prices differ between customers, regions or time periods.

RESPONSE:

This question is not applicable because Nam Kim did not issue any price lists for its domestic market sales of the like product. Prices were determined on a case-by-case basis based on the specific market situation.

7. If price lists are not used as a basis, explain how and on which basis prices are fixed during sales negotiations. If your salesmen use a standard contract, provide a copy.

RESPONSE:

Nam Kim Steel does not maintain a standard price list for its steel products. Selling prices are determined on a transaction-by-transaction basis during negotiations with customers in response to specific customer inquiries.

In determining the quoted price, the Company considers a number of commercial factors, including: [***].

The final selling price for each order is subject to the approval of [***].

Additionally, Nam Kim does not use a standard contract for its sales transactions.

8. List any cost incurred by customers that have been paid or reimbursed by your company (directly or indirectly) and vice versa. Explain in detail the nature of the cost and whether it was related to the like product.

RESPONSE:

Not applicable. Nam Kim Steel did not pay or reimburse any cost to its customers.

D-2 Allowances on Domestic Sales

Where normal value and export price of the like product and subject merchandise as established are not at a comparable basis, due allowance in the form of adjustments can be made, ***on its merits****, for differences that affect price comparability. You may claim adjustments where it can be demonstrated that the factor concerned is one that has resulted in a different price being charged to your customers in order to carry out a fair comparison between export price and normal*

value. ***An adjustment can only be made for expenses that are directly related to the sales of the like product****.*

You are requested to provide in detail all adjustments listed in this section, on a transaction-by-transaction basis. Please use the ***"DOM-SALE"*** *Excel format provided. Report actual expenses incurred. Where actual figures are unavailable, average or proportionate costs may be used, provided the allocation methodology is clearly explained. Any such allocations must be explicitly indicated and supported by relevant details, including the specific amounts, the rationale for allocation, and the methodology applied.*

You are to report all expenses incurred by your company relating to domestic sales that could affect price comparisons, even if there is no claim adjustment on sales.

1. Complete Table D-3.1 and Table D-3.2 in Excel format provided "DOM-SALE" of all adjustments you claim (refer paragraph D-2.2 to D-2.11) for all sales to customers in the domestic market, on a transaction-by-transaction basis. All allowances should be reported in the currency in which your accounts are kept.

RESPONSE:

Please refer to **Table D-3.1 (DOM-CUST)** and **Table D-3.2 (DOM-SALE).**

2. Differences in physical characteristics:

   In comparing the type of product exported to Malaysia with the most similar product sold by your company in the domestic market, adjustments can be made to take account of physical differences between the types. The amount of the adjustments shall correspond to a reasonable estimate of the market value of the difference.

   a. Identify separately the physical differences between each type of the product and provide a detailed list of all physical differences with a full explanation of each item listed.

   b. For each difference claimed, provide detailed information of the market value of such difference. Identify the source of your data.

RESPONSE:

Not applicable. Nam Kim Steel is not claiming any adjustment for any physical differences between the type of products sold domestically and in the Malaysian market.

3. Indirect taxes:

An adjustment concerning indirect taxes can be made where it can be demonstrated that the price comparability is affected.

RESPONSE:

Only value-added tax (VAT) was applied to products sold in the domestic market. This tax is applicable to domestic consumers and is not collected for products exported to Malaysia or any other foreign market.

a. List all indirect taxes imposed on the domestic market products that were either rebated upon exportation or not collected on the products exported to Malaysia.

RESPONSE:

Value-added tax (VAT) applicable to products sold in the domestic market is subject to the standard VAT rate of 10%. For products exported to Malaysia, the VAT rate is 0%, and the related input VAT is eligible for a refund in accordance with applicable regulations.

Other than VAT, Nam Kim does not incur any other indirect taxes on products sold in the domestic market that are exempted, reduced, refunded, or not collected upon exportation to Malaysia.

b. For each tax listed, provide English translations (as described in the General Instructions) of statutes and regulations authorising the collection of the tax, including documents which explain the method of calculation, assessment, and payment of the tax.

RESPONSE:

The legal documents governing value-added tax (VAT) obligations are as follows:

For the period before July 1, 2025:

- **Law on Value-Added Tax No. 13/2008/QH12**, dated June 3, 2008: provides for taxable subjects, taxpayers, the basis and methods for calculating VAT, and VAT credit and refund mechanisms.
- **Law on Tax Administration No. 38/2019/QH14**, dated June 13, 2019: provides for the declaration and payment of VAT.
- **Decree No. 209/2013/ND-CP**, dated December 18, 2013: provides guidance on the implementation of the Law on Value-Added Tax.
- **Circular No. 219/2013/TT-BTC**: provides guidance on the implementation of Decree No. 209/2013/ND-CP.
- **Circular No. 25/2018/TT-BTC**, dated March 16, 2018: provides detailed regulations on VAT credit.

For the period from July 1, 2025 to present:

- **Law on Value-Added Tax No. 48/2024/QH15**, dated November 26, 2024: provides for taxable subjects, the basis and methods for calculating VAT, and VAT credit and refund mechanisms.
- **Decree No. 181/2025/ND-CP**, dated July 1, 2025: provides guidance on the implementation of the 2024 Law on Value-Added Tax, including regulations on VAT refunds.
- **Decree No. 252/2026/ND-CP**, dated June 30, 2026: provides for the declaration and payment of VAT.
- **Circular No. 69/2025/TT-BTC**, dated July 1, 2025: provides guidance on the implementation of the Law on Value-Added Tax.

Please refer to **Exhibit D-2.3.b – VAT** for the relevant legal documents governing VAT.

Although the VAT legal framework was updated effective July 1, 2025 under Law on Value-Added Tax No. 48/2024/QH15, the basic principles concerning taxable subjects, the basis for calculating VAT, tax rates, methods of tax calculation, and VAT credit and refund mechanisms have remained generally consistent.

c. For each tax listed, provide separately 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.

RESPONSE:

(i) Tax Base

Pursuant to Article 3 and Point a, Clause 1, Article 7 of Law on Value-Added Tax No. 13/2008/QH12 (for the period before July 1, 2025), and Article 3 and Point a, Clause 1, Article 7 of Law on Value-Added Tax No. 48/2024/QH15 (for the period from July 1, 2025), the VAT taxable price for products sold in the domestic market is the selling price exclusive of VAT (Net Value).

(ii) Tax Rate

Pursuant to Clause 3, Article 8 of Law on Value-Added Tax No. 13/2008/QH12 and Clause 3, Article 9 of Law on Value-Added Tax No. 48/2024/QH15, the VAT rate applicable to like products sold in the domestic market is **10%**.

(iii) Tax Calculation

Point a, Clause 4, Article 7 of Decree No. 209/2013/ND-CP and Clause 1, Article 21 of Decree No. 181/2025/ND-CP, Nam Kim is a company with annual revenue from the sale

of goods exceeding VND [xxx] billion and is subject to the VAT credit method. Accordingly, Nam Kim declares and pays VAT under the **credit method**.

For each domestic sales transaction:

VAT = Net Value × 10%
Gross Value = Net Value + VAT

For example, if the selling price exclusive of VAT is **VND 100**:

VAT = 100 × 10% = VND 10;
Gross Value = Net Value + VAT amount = 100 + 10 = **VND 110**.

(iv) Taxes Assessed

The VAT amount for each domestic sales transaction is determined and reflected in **Table D-3.2**, including:

- **NET-VAL:** Selling price exclusive of VAT;
- **SALES-TAX:** VAT collected from customers;
- **GR-VAL:** Selling price inclusive of VAT;
- **GOV-VAT:** VAT declared and paid by Nam Kim to the Government.

The VAT amount in the **SALES-TAX** column is calculated as 10% of the NET-VAL and corresponds exactly to the VAT amount stated on the VAT invoice for each transaction.

VAT is a tax collected by Nam Kim on behalf of the Government from domestic customers and is neither revenue nor an expense of the Company. Therefore, such VAT should be excluded from the VAT-inclusive selling price when making the indirect tax adjustment to ensure price comparability pursuant to Article 2.4 of the Anti-Dumping Agreement.

(v) Tax Deductions

Pursuant to Clause 1, Article 7 of Decree No. 209/2013/ND-CP and Clause 1, Article 20 of Decree No. 181/2025/ND-CP, Nam Kim applies the VAT credit method in accordance with Vietnamese law. Accordingly:

VAT payable = Output VAT − Creditable Input VAT

- If output VAT is greater than creditable input VAT, Nam Kim pays the difference to the Government.
- If output VAT is less than creditable input VAT, the difference is carried forward to the following tax period.

d. Indicate when you are legally obligated or liable for tax payment. Explain when you actually paid taxes and whether you maintain separate accounts for these taxes.

RESPONSE:

Under Vietnamese law, VAT liability arises at the time Nam Kim issues the VAT invoice for the sales transaction.

Pursuant to Point a, Clause 1, Article 44 of Law on Tax Administration No. 38/2019/QH14 and Clause 2, Article 10 of Decree No. 25/2026/ND-CP, Nam Kim declares and pays VAT on a monthly basis. The deadline for submitting the VAT return and paying the tax is the 20th day of the month following the month in which the tax liability arises.

The Company monitors and records VAT in accordance with the prevailing accounting regulations, specifically as follows: [***].

The issuance of invoices is carried out through an electronic invoicing system connected to the tax authorities in accordance with Vietnamese law, ensuring that each invoice is duly authenticated in accordance with applicable regulations.

However, the Company [***] where such taxes arise from the Company's ordinary production and business activities. Such VAT is recorded in the Company's general accounting system and can be traced through the SAP system and detailed reports.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

e. Report the amount of any such taxes imposed in the domestic market on the transaction-by-transaction basis. Explain how you calculated this amount.

RESPONSE:

For each domestic sales transaction, the VAT amount is calculated using the following formula:

VAT amount = Net Value (column "NET-VAL") × 10%

The VAT amount for each transaction is reflected in the SALES-TAX column of **Table D-3.2** and is also recorded in the GOV-VAT column as the amount of VAT declared by Nam Kim.

This VAT amount is calculated directly based on the selling price exclusive of VAT (NET-VAL) for each transaction and corresponds exactly to the VAT amount stated on the VAT invoice issued to the customer.

4. Differences in discounts, rebates and quantities:

The term "rebate" includes provision of either currency, credit on current or future purchases, promissory notes, extension of credit, or free goods or services. Any claim should be properly quantified and directly linked to the sales listed in "DOM-SALE".

a. Describe in detail your policy for granting discounts and rebates to domestic customers.

RESPONSE:

Nam Kim applies only one type of discount policy, namely a [discount]. Nam Kim [***]. Any discounts and rebates have been reported in the **OTH-DISC** and **REB** columns of **Table D-3.2** as required.

b. List all kinds of discounts or rebates you granted, e.g., cash discounts quantity discounts, loyalty discounts, year-end rebates, deferred discounts etc. and describe their terms. Include deferred discounts.

RESPONSE:

For discounts: The Company only provides [discount]. [Discount] are recorded by the Company in accordance with [***]. The discount amount is determined based on [***].

For rebates: The Company only grants [***].

c. If discounts or rebates vary by class of customer (e.g., distributors and retailers), explain separately the discounts and rebates given to each class.

RESPONSE:

Regarding Nam Kim's sales discount policy, as explained above, Nam Kim applies only one type of discount, namely a [discount]. However, the discount level is determined based on [***].

d. List all of your customers and the customer numbers (as in the Table D-3.1) who were eligible for each discount or rebate program and describe the criteria you used to determine their eligibility.

RESPONSE:

Please refer to our response above and **Table D-3.2**.

e. Provide discount schedules, and be prepared to furnish on request contracts or agreements that reflect all discounts and rebates that were given. Identify the source of your data.

RESPONSE:

There is no fixed discount schedule for [discount]. Nam Kim Steel will issue the discount policy at the beginning of the applicable period based on market conditions. The [discount] amount is determined according to [***].

We are prepared to provide the relevant contracts and agreements upon request.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

4. Differences in the level of trade:

*An adjustment may be granted, **on its merits**, where you can show that your domestic sales of the like product are being made at level of trade, which is different to the level of trade of your export sales and such difference has affected price comparability.*

a. Clearly identify the domestic and export level of trade by demonstrating that functions and prices for the sales in question are appropriate to the alleged level of trade in both markets.

b. For export sales to a related importer, identify level of trade of the sales between your company and the related importer.

c. Report the market value of the differences on the transaction-by-transaction basis.

RESPONSE:

Nam Kim Steel does not differentiate sales based on the level of trade for either domestic or export sales. Therefore, this adjustment is not applicable to Nam Kim Steel's sales transactions.

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

An adjustment can only be made for transportation costs, which were incurred subsequent to the sale being made, for moving the products from the production premises to customer.

a. List all charges that are included in the domestic prices and explain how you have quantified each of these charges.

RESPONSE:

Nam Kim Steel incurred [charge] expenses for different customers, with the amount varying depending on the market situation at specific times. All [charge] expenses were recorded and allocated based on the actual sold goods in the corresponding Year 1, Year 2 and POI.

6. Differences in packing costs:

   a. Specify the per-unit packing cost incurred for each type of the like product.

RESPONSE:

Nam Kim Steel reports domestic packing costs for domestic sales based on [***].

These costs are recorded as [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

   b. List material and labour costs separately. Be specific in describing packing materials and any special or extraordinary procedures used in preparing the like product.

RESPONSE:

The costs of packaging materials and labor are recorded as [***], as reported in our response above.

The packaging materials used for domestic sales of like products are as follows: [***].

Nam Kim does not use any special or extraordinary procedures in preparing like products for sale in the domestic market.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

7. Differences in the cost of any credit granted for the sales:

   Cost of credit refers to the "costs" of granting credit for a specific sales transaction and the parties involved agreed to terms of payment.

   a. Describe the method you have used to calculate the credit costs.

b. Indicate the interest rate you used to compute expenses associated with granting credit on sales.

c. Explain your calculation of credit costs in the transaction-by-transaction basis.

RESPONSE:

The credit expense is calculated using the following formula: [formula].

8. Provide information on interest rates you paid for short-term borrowings for the currencies concerned.

RESPONSE:

The currency for domestic transactions is VND.

Nam Kim Steel would like to submit the interest rates for short-term borrowings during Year 1 as per the table below:

[***]

Nam Kim Steel would like to submit the interest rates for short-term borrowings during Year 2 as per the table below:

[***]

Nam Kim Steel would like to submit the interest rates for short-term borrowings during the POI as per the table below:

[***]

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

9. Differences in the direct costs of providing warranties and guarantees as provided by law and/or in the sales contract:

a. List all direct costs incurred and specified in the domestic sales contracts, or were required by the law of the countries concerned, e.g., the cost of material concerned.

b. For each model/type, provide a separate record of warranty/guarantee expenses for sales of the like product.

c. State how you calculated these expenses. Identify your source of data.

d. If the expenses were incurred only for certain customers provide customer specific information.

e. If the expenses were only incurred on some of the like product, or if expenses vary among product types, identify the product types and explain any allocation method you have used.

f. Explain your calculation of warranty/guarantee costs in the transaction-by-transaction basis.

RESPONSE:

Nam Kim Steel did not provide any warranties, guarantees, technical assistance or services as required by law or stipulated in the sales contract for the domestic market.

10. Differences in commissions paid in respect of the sales of the like product within
Year 1, Year 2 and POI:

a. Provide the amount of commission expenses paid to unrelated or related sellers and explain the terms under which commissions are given.

RESPONSE:

Not applicable. Nam Kim Steel did not pay any commission.

11. Identify the general ledger accounts where the expense is recorded.

RESPONSE:

Nam Kim Steel reports the listed charges that are included in the domestic price as follows:

[***]

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

12. Other factors:

Adjustments may also be made for differences in other factors not provided for under paragraph D-2.2 to D-2.11, if can be demonstrated that such adjustments affect price comparability and have historically been utilised. In particular, customers consistently pay different prices in the domestic market because of the differences in such factors.

RESPONSE:

Not applicable. Nam Kim Steel is not claiming for any other adjustment other than those mentioned above.

D-3 Format of Submission

1. Provide information on **all customers** (unrelated and related customer) **in domestic market**. For this purpose, use Excel format as per Table D-3.1.

Table D-3.1: Domestic Market Sales – Customer Listing (DOM-CUST)

Field name	Field description	Explanation
Y/Q	Year/quarter	Sales transaction of Year 1, Year 2 and POI.
TRCOMP-NAME	Trading company name	Names of your trading/intermediary company
TRCOMP-NO	Trading company code number	Trading/Intermediary company's code number used for each of your customers
TRCOMP-REL	Trading company relation	"U" for unrelated trading/intermediary company; and "R" for related trading/intermediary company
CUST-NAME	Customer name	Customer name
CUST-NO	Customer code number	Customer code number
CUST-ADD	Customer address	Complete address of your customers
CUST-REL	Customer relation	"U" for unrelated customer and "R" for related customer

Field name	Field description	Explanation
CUST-LEV	Customer level of trade	Code "1" for original equipment manufacturer (OEM); code "2" for distributor; code "3" for retailer; code "4" for end-user; and "5" for others (specify the customer type)
PDT-DES	Product description	Product description of the like product i.e., product name
PDT-CODE	Product sales code	Product sales code used for the like product
PDT-GRADE	Product grade	Product grade of the like product
PDT-CLASS	Product classification	Product classification (Prime or Non-Prime) according to producer/exporter
PDT-SPEC	Product specification	Product specification of the like product i.e., technical characteristic or any other relevant specification
PDT-USAGE	Product usage	Product usage of the like product
QTY	Quantity	Quantity of the like product sold (specify the unit of measurement used)
LP-TURNOVER	Like product's turnover	Total turnover of the like product sold per customer (specify currency used)
TOT-TURNOVER	Total turnover of all product sold	Total turnover per customer for all products sold by your company (specify currency used)
SALES-DISC	Sales discounts	Total discounts granted to the customers of the like product (specify currency used)
REB	Rebates	Total rebates granted to the customers of the like product (specify currency used)
PAY-TERM	Payment terms	Agreed payment terms (e.g., 30, 60, 90 days, etc.)
DEL-TERM	Delivery terms	Agreed terms of delivery (e.g., FOB, C&F, CIF, etc.)

RESPONSE:

Please refer to **Table D-3.1 (DOM-CUST)**.

2. Provide information on transaction-by-transaction basis relating to **sales of like product** to **all customers** (unrelated and related customer) **in domestic market** during the period of **Year 1, Year 2** and **POI**. For this purpose, use Excel format as per Table D-3.2.

Table D-3.2: Domestic Market Sales Listing (DOM-SALE)

Field name	Field description	Explanation
SEQ-NO	Sequential number	Sequential number for each transaction, or line item, in the sales listing (i.e., the first transaction is "1", the second is "2", and so on)
ACC-NO	Accounting ID number	Accounting ID or document number as recorded in accounting system
CODE	Company internal coding system	Code used for the product
TRCOMP-NAME	Trading company name	Names of your trading/intermediary company
TRCOMP-NO	Trading company number	Trading/Intermediary company's code number used for each of your customers
TRCOMP-REL	Trading company relation	"U" for unrelated trading/intermediary company; and "R" for related trading/intermediary company
INV-NO	Invoice number	Actual invoice number
INV-DATE	Invoice date	Actual invoice date of the transaction
CUST-NAME	Customer name	Customer name
CUST-NO	Customer code number	Customer code number as defined in file "DOM-CUST"

Field name	Field description	Explanation
CUST-REL	Customer relation	"U" for unrelated customer; and "R" for related customer
CUST-LEV	Customer level of trade	Code "1" for original equipment manufacturer (OEM); code "2" for distributor; code "3" for retailer; code "4" for end-user; and "5" for others (specify the customer type)
PDT-DES	Product description	Product description of the like product i.e., product name
PDT-CODE	Product sales code	Product sales code used for the like product
PDT-GRADE	Product grade	Product grades of the like product
PDT-CLASS	Product classification	Product classification (Prime or Non-Prime) according to producer/exporter
PDT-SPEC	Product specification	Product specification of the like product i.e., technical characteristic or any other relevant specification
PDT-USAGE	Product usage	Product usage of the like products
H.S.	H.S. Codes	Harmonized System Codes of the like product
PHY-DIF	Physical difference	Market value of the physical differences
ORD-NO	Sales order/ contract number	Sales order or contract number of the transaction concerned
ORD-DATE	Date of sales order /contract	Date on which the sales order/contract was issued
SHIP-DATE	Shipment Date	The date of the like product was shipped out
LAD-NO	Bill of lading number	Reference number of the bill of lading or other transport document
DEL-TERM	Delivery terms	Agreed terms of delivery (e.g., FOB, C&F, CIF, etc.)

Field name	Field description	Explanation
PAY-TERM	Payment terms	Agreed payment terms (e.g., 30, 60, 90 days, etc.)
DATE-PAY	Date of payment received	Date on which the company received payment
MODE-PAY	Mode of payment	Mode of payment made by customer (e.g., cash, bank draft, telegraphic transfer (TT), letter of credit (LC), etc.)
QTY	Quantity	Quantity of the like product for the transaction (specify the unit of measurement used)
GR-VAL	Gross invoice value	Gross invoice value inclusive of sales tax/VAT (specify currency used)
SALE-DISC	Sales discount	Sales discount deducted on the invoice referred for the transaction (specify currency used)
SALES-TAX	Sales tax/VAT	Actual amount of sales tax/VAT charged to customer (specify currency used)
GOV-VAT	Government VAT	Actual amount of VAT paid to the Government (specify currency used)
NET-VAL	Net invoice value	Net invoice value of the transaction after sales discount and sales tax/VAT on the invoices, in the currency of sale (specify currency used)
DOC-TYPE	Type of document	Type of document: “CN” for credit note; and “DN” for debit note (if applicable for each transaction or line item)
CN/DN-NO	Credit/debit note number	Credit/debit note number issued for the transaction concerned
CN/DN DATE	Credit/debit note date	Date of credit/debit note issued for the transaction concerned
CN/DN-CAT	Credit/debit note category	Credit/debit category (i.e., discount, rebate, sales return, price adjustment, quantity adjustment)

Field name	Field description	Explanation
REMARK	Credit/debit note remark	Reason for issuing the credit/debit notes (e.g., cash discount, loyalty discount, bulk purchase, rebate, sales return, quality issue and other)
CN/DN-QTY	Quantity credited/debited	Quantity credited/debited as appropriate (specify the unit of measurement used)
SALES-RETURN	Sales return value	Sales return value in the currency of sales (specify currency used)
OTH-DISC	Other discounts	Actual amount of discount that was not deducted from the invoice. If more than one type of other discount, insert additional column of data at this point for the additional types of other discounts (specify the types and currency used). Do not aggregate the discounts
REB	Rebate	Actual amount of rebate granted to the customer. If more than one type of rebate, insert additional column of data at this point for the additional types of rebates (specify the types and currency used). Do not aggregate the rebates
NET-QTY	Net quantity	Net quantity after credit/debit adjustment (specify the unit of measurement used)
NET-VAL CN/DN	Net sales value after credit/debit adjustments	Net sales value after all credit/debit notes adjustments, including the sales discounts, sales returns, sales tax/VAT and all other applicable adjustments as recorded in your accounting records (specify currency used)
DRAW	Import charges and indirect taxes	Amount of import charges and indirect taxes paid (specify currency used)
LEV-ADJ	Level of trade adjustment	Market value of the differences in level of trade
INL-FRE	Inland freight cost	Amount of inland freight cost in the domestic market (specify currency used)

Field name	Field description	Explanation
PACK	Packing expenses	Amount of packing expenses (specify currency used)
BANK	Bank charges	Bank charges related to the transaction, e.g., document fee, bank commission, currency exchange, etc. (specify currency used)
CREDIT	Credit cost	Amount of cost of providing credit to your customer (specify currency used)
WARR	Warranty/ guarantee	Amount of warranty and guarantee expenses (specify currency used)
AFT-SALE	Expenses for technical assistance	Amount of expenses for technical assistance and services (specify currency used)
COMM	Commission	Amount of commission paid related to the sales of the like product. If more than one type of commission is paid, insert additional column of data at this point for the additional types of commission paid (specify the types and currency used). Do not aggregate the commission.
OTHER	Other adjustments	Any other amount of adjustment (please specify)

RESPONSE:

Please refer to **Table D-3.2 (DOM-SALE)**.

SECTION E: EXPORT SALES OF THE SUBJECT MERCHANDISE

This section requests the details of all the export sales of the subject merchandise to Malaysia for Year 1, Year 2 and POI. In particular this section requires you to provide sales prices and pricing methods for these sales.

Please note that every invoice line of the subject merchandise should be reported as a separate transaction. In order to determine which sales fall within the Year 1, Year 2 and POI, ***the invoice date should be used as the date of sale****.*

E-1 General Information

1. Explain your company's **channels of distribution** in the export market starting from the factory gate up to sales transaction to each class of customers (e.g., producers, distributors, wholesales, retailers), including related companies. Include a detailed **flow chart** indicating terms of sale and pricing. Explain the basis of your **categorisation of customers.**

RESPONSE:

Nam Kim Steel does not have any related customers overseas; all foreign customers are unrelated parties. The classification of customers is based on their multifunctional roles as [***]. However, Nam Kim follows the same process for all sales transactions, regardless of customer classification.

Similar to the domestic market, Nam Kim Steel categorizes customers based on their business function, essentially dividing them into [xxx] main groups: [***].

[Confidential flowchart on customer categorisation]

We sold subject merchandise to Malaysia market under [***] terms, most of the goods were transported by [***].

- Under [***] sales contract term: Nam Kim Steel (NKG) is responsible for [***].
- Under [***] sales contract term: NKG is responsible for [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

2. Provide **detailed description of how sales are made**, indicating the procedure followed between time of order and delivery to the first customer. A **full explanation** of how the **invoicing** and **payment** is made should be given. Provide a separate sample **chronological flowchart** detailing every

step in this process. Indicate the **average time frame** within which each step takes place. Please **differentiate** the sales process made through between **related** and **unrelated** companies.

RESPONSE:

All sales made to export customers were to unrelated customers.

Most Malaysian customers of the subject merchandise are considered [***]. Thus, a sale begins when a customer provides information about a fresh demand. The appointed salesperson continues discussions with the customer, engaging in multiple rounds of negotiation to finalize details such as [***], which are then documented in the [***].

According to our policy, all export sales orders must have [***].

The time between order placement and delivery depends on the required specifications of the subject merchandise and the assigned production line, but it is typically within [xxx] months.

Invoices are issued based on [***] once Nam Kim Steel completes production and prepares the finished products for shipping. The invoice is sent to the export customer within [xxx] business days from [***].

The flow chart below demonstrates every step of a Malaysian sale:

[Confidential flowchart on sales process]

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

3. Describe each step in the sales negotiation process, from the first point of contact with the purchaser up to any after sales price adjustments. If this sales process differs between classes of customers, describe each variation separately.

RESPONSE:

The selling prices of Nam Kim Steel's steel products are determined not only by [***].

The sales staff will negotiate prices with customer based on [***]. The final price will be approved by [***] for each order.

Nam Kim Steel does not differentiate the terms of sale and pricing based on customer categorization.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

4. Explain whether production begins after the customers have establishing their product specifications (contract) and the sale has been made, or pursuant to normal company production schedules.

RESPONSE:

Production only begins after [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

5. If your sales are made pursuant to contracts (either long-term or short-term), describe in detail the process by which the contracts, the prices and quantities are agreed to. Describe each of the types of contracts applicable to the subject merchandise, including the terms, the requirements for a price change or re-negotiation by either side, etc. Explain any commitments on either party, should the contract be terminated prematurely.

RESPONSE:

This question is not applicable because all of Nam Kim Steel's sales to Malaysia were made to individual purchase order (i.e. spot sale).

6. Provide copies of all price lists issued or in use for Year 1, Year 2 and POI for all customer in Malaysia market, including those used by related companies. Explain how these price lists are used to establish the final sales price to the individual customers and whether sales prices differ between customers, regions or time periods.

RESPONSE:

This question is not applicable because Nam Kim Steel did not issue any price lists for exports of the subject merchandise. Prices were negotiated between Nam Kim Steel and its Malaysian customers on a case-by-case basis.

7. If price lists are not used as a basis, explain how and on which basis prices are fixed during sales negotiations. If your salesmen use a standard contract, provide a copy.

RESPONSE:

The selling prices of Nam Kim Steel's steel products are determined not only by [***].

The sales staff will negotiate prices with customer based on [***]. The final price will be approved by [***] for each order.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

8. List any cost incurred by customers that have been paid of reimbursed by your company (directly or indirectly) and vice versa. Explain in detail the nature of the cost and whether it was related to the subject merchandise.

RESPONSE:

This question is not applicable because Nam Kim Steel did not pay or reimburse any costs to its customers.

E-2 Allowances on Export Sales

Where normal value and export price of the like product and subject merchandise as established are not at a comparable basis, due allowance in the form of adjustments can be made, ***on its merits****, for differences that affect price comparability. You may claim adjustments where it can be demonstrated that the factor concerned is one that has resulted in a different price being charged to your customers in order to carry out a fair comparison between export price and normal value.* ***An adjustment can only be made for expenses that are directly related to the sales of the subject merchandise.***

*You are requested to provide in detail all adjustments listed in this section, on a transaction-by-transaction basis. Please use the "****MY-SALE****" and* ***"TRC-SALE"*** *Excel format provided.* ***Report actual expenses incurred****. Where actual figures are unavailable, average or proportionate costs may be used, provided the allocation methodology is clearly explained. Any such allocations must be explicitly indicated and supported by relevant details, including the specific amounts, the rationale for allocation, and the methodology applied.*

You are to report all expenses incurred by your company relating to Malaysia sales that could affect price comparisons, even if there is no claim adjustment on sales.

1. Complete Table E-3.1 (EXP-CUST), Table E-3.2 (MY-SALE) and Table E-3.3 (TRC-SALE) in Excel format provided of all adjustments you claim (refer

paragraph E-2.2 to E-2.12) for all sales to customers in Malaysia and appropriate third countries on a transaction-by-transaction basis. All allowances should be reported in the currency in which your accounts are kept.

RESPONSE:

Please refer to **Table E-3.1 (MY-CUST), Table E-3.2 (MY-SALE)** and **Table E-3.3 (TRC-SALE).**

2. Differences in physical characteristics:

In comparing the type of product exported to Malaysia with the most similar product sold by your company in the domestic market, adjustments can be made to take account of physical differences between the types. The amount of the adjustments shall correspond to a reasonable estimate of the market value of the difference.

a. Identify separately the physical differences between each type of the product and provide a detailed list of all physical differences with a full explanation of each item listed.

b. For each difference claimed, provide detailed information of the market value of such difference. Identify the source of your data.

RESPONSE:

Not applicable. Nam Kim Steel is not claiming for any adjustment for any physical differences between the types of product sold domestically and in the Malaysian market.

3. Indirect taxes:

An adjustment concerning indirect taxes can be made where it can be demonstrated that the price comparability is affected.

a. List all indirect taxes imposed on the export market products that were either rebated upon exportation or not collected on the products exported to Malaysia and appropriate third countries.

RESPONSE:

Under Vietnamese law, **exported goods, including goods exported to Malaysia and other export markets, are subject to a 0% VAT rate**, provided that all applicable legal conditions are satisfied.

Accordingly, **Nam Kim does not collect output VAT on export transactions**. At the same time, the Company may be **entitled to a refund of input VAT incurred in**

connection with exported goods, provided that the relevant conditions under Vietnamese law are satisfied.

b. For each tax listed, provide English translations (as described in the General Instructions) of statutes and regulations authorising the collection of the tax, including documents which explain the method of calculation, assessment, and payment of the tax.

RESPONSE:

Nam Kim does not collect VAT from foreign customers in respect of export transactions. At the same time, eligible input VAT incurred in the course of producing exported goods is refundable in accordance with the provisions of Vietnamese law. Please refer to **Exhibit D-2.3.b – VAT** for the relevant legal documents governing VAT

c. For each tax listed, provide separately 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.

RESPONSE:

(i) Tax Base

Pursuant to Clause 1, Article 6 of Decree No. 209/2013/ND-CP and Article 17 of Decree No. 181/2025/ND-CP, the taxable price for exported goods is the export selling price exclusive of VAT (i.e., the export price before VAT).

As exported goods are subject to a 0% VAT rate, the output VAT arising from export transactions is zero.

(ii) Tax Rate

Pursuant to Clause 1, Article 6 of Decree No. 209/2013/ND-CP and Article 17 of Decree No. 181/2025/ND-CP, Nam Kim is an enterprise engaged in export activities, and the VAT rate applicable to exported goods, including goods exported to Malaysia, is **0%**.

Therefore, **the VAT rate applicable to the subject merchandise exported to Malaysia is 0%**.

(iii) Tax Calculation

Pursuant to Point a, Clause 4, Article 7 of Decree No. 209/2013/ND-CP and Clause 1, Article 21 of Decree No. 181/2025/ND-CP, Nam Kim is subject to the VAT **credit method**.

For each export transaction:

Output VAT = Export selling price × 0%
Total payment amount = Export selling price + VAT

For example, if the export selling price is VND 100:

Output VAT = 100 × 0% = VND 0;
Total payment amount = Net value + VAT amount = 100 + 0 = **VND 100**.

(iv) Taxes Assessed

As exported goods are subject to a 0% VAT rate, Nam Kim does not incur any output VAT on individual export transactions, which has been reported in **Table E-3.2**.
Accordingly:

- **NET-VAL:** Export selling price;
- **SALES-TAX:** 0;
- **GR-VAL:** Equal to NET-VAL.

(v) Tax Refunds

Although no output VAT arises on exported goods, Nam Kim is entitled to a refund of input VAT incurred from the purchase of goods and services used for the production of exported goods, according to the following method:

VAT Refund = Input VAT − Output VAT

For exported goods, output VAT is subject to a 0% VAT rate. Therefore, the input VAT attributable to exported goods is refundable.

The VAT refund will be paid by the Government in cash and recorded in **Account [xxx]**. Therefore, the refunded VAT is not a direct deduction from the export selling price. Rather, it represents an additional amount that increases the company's profit margin from export activities.

Nam Kim reported the VAT refund amount relating to export transactions in the **VAT-REBATE** column of **Table E-3.2**.

d. Indicate when you are legally obligated or liable for tax payment. Explain when you actually paid taxes and whether you maintain separate accounts for these taxes.

RESPONSE:

Under Vietnamese law, VAT liability arises at the time Nam Kim issues the VAT invoice for the sales transaction.

Pursuant to Point a, Clause 1, Article 44 of Law on Tax Administration No. 38/2019/QH14 and Clause 2, Article 10 of Decree No. 25/2026/ND-CP, Nam Kim declares and pays VAT on a monthly basis. The deadline for submitting the VAT return and paying the tax is the 20th day of the month following the month in which the tax liability arises.

The Company monitors and records VAT in accordance with the prevailing accounting regulations, specifically as follows: [***].

The issuance of invoices is carried out through an electronic invoicing system connected to the tax authorities in accordance with Vietnamese law, ensuring that each invoice is duly authenticated in accordance with applicable regulations.

However, the Company [***] where such taxes arise from the Company's ordinary production and business activities. Such VAT is recorded in the Company's general accounting system and can be traced through the SAP system and detailed reports.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

e. Report the amount of any such taxes imposed in the export market on the transaction-by-transaction basis. Explain how you calculated this amount.

RESPONSE:

For each export transaction, the output VAT is calculated according to the following formula:

Output VAT = Export selling price × 0% = 0

Therefore, the output VAT for each export transaction is zero. The VAT amount for each transaction reported in the SALES-TAX column of Table E-3.2 is accordingly 0.

f. Provide complete information on the VAT or equivalent for export tax scheme concerning the subject merchandise.

RESPONSE:

As presented above, under Vietnamese law, the VAT rate applicable to exported goods is 0%, and the export tax rate is also **0%**. At the same time, enterprises are entitled to a refund of eligible input VAT.

Therefore, the refunded VAT does not constitute a deduction from the export selling price. Rather, it represents an additional source of income/amount that enhances export revenue and helps offset the costs associated with export activities.

4. Differences in discounts, rebates and quantities:

The term 'rebate' includes provision of either currency, credit on current or future purchases, promissory notes, extension of credit, or free goods or services.
Any claim should be properly quantified and directly linked to the sales listed in "MY-SALE.

a. Describe in detail your policy for granting discounts and rebates to customers in Malaysia and other countries.

b. List all kinds of discounts or rebates you granted, e.g., cash discounts quantity discounts, loyalty discounts, year-end rebates, deferred discounts etc. and describe their terms. Include deferred discounts.

c. If discounts or rebates vary by class of customer (e.g., distributors and retailers), explain separately the discounts and rebates given to each class.

d. List all of your customers and the customer numbers (as in the Table E-3.1) who were eligible for each discount or rebate program and describe the criteria you used to determine their eligibility.

e. Provide discount schedules, and be prepared to furnish on request contracts or agreements that reflect all discounts and rebates that were given. Identify the source of your data.

RESPONSE:

At the time of [***]. Therefore, there is no adjustment claimed on discounts, rebates and quantities differences.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

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

An adjustment can only be made for transportation costs, which were incurred subsequent to the sale being made, for moving the products from the production premises to customer.

a. List all charges that are included in the export prices and explain how you have quantified each of these charges.

RESPONSE:

Nam Kim Steel incurred different amounts of charges for different customers, depending on the terms of sales and the market situation at each specific time. These charges include [charges].

[Charges] are recorded and allocated based on the [methodology] in the corresponding Year 1, Year 2, and POI.

All other costs, including [charges], are recorded and allocated based on [methodology] in the corresponding Year 1, Year 2, and POI.

6. Difference in packing costs:

   a. Specify the per-unit packing cost incurred for each type of the subject merchandise.

   b. List material and labour costs separately. Be specific in describing packing materials and any special or extraordinary procedures used in preparing the subject merchandise for shipment to Malaysia and appropriate third countries.

   c. If the subject merchandise is subsequently repackaged in Malaysia and appropriate third countries, report these charges and costs separately.

RESPONSE:

Nam Kim Steel reports packing cost for exports to Malaysia based on [***].

This cost is recorded as [***].

The subject merchandise is not subsequently repackaged in Malaysia or other countries. The finished product includes standard packaging and are ready for pickup at our warehouse, for arrangement for [***].

The package materials used for Malaysian sales of subject merchandises are as below: [***].

Nam Kim does not use any special or extraordinary procedures in preparing subject merchandises for sale in the Malaysian market.

7. Difference in the cost of any credit granted for the sales:

   Cost of credit refers to the "costs" of granting credit for a specific sales transaction and the parties involved agreed to terms of payment.

a. Describe the method you have used to calculate the credit costs.

b. Indicate the interest rate you used to compute expenses associated with granting credit on sales.

c. Explain your calculation of credit costs in the transaction-by-transaction basis.

RESPONSE:

Nam Kim Steel did not grant any credit for any sale of subject merchandise to Malaysia during the Year 1, Year 2 or during the POI. Thus, this adjustment is not applicable.

8. Provide information on interest rates you paid for short-term borrowings for the currencies concerned.

RESPONSE:

The currency for Malaysian transactions is USD.

Nam Kim Steel would like to submit the interest rates for short-term borrowings during Year 1 as in the table below:

[***]

Nam Kim Steel would like to submit the interest rates for short-term borrowings during Year 2 as in the table below:

[***]

Nam Kim Steel would like to submit the interest rates for short-term borrowings during the POI as in the table below:

[***]

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

9. Differences in the direct costs of providing warranties and guarantees as provided by law and/or in the sales contract:

a. List all direct costs incurred and specified in the export sales contracts, or were required by the law of the countries concerned, e.g., the cost of material concerned.

b. For each model/type, provide a separate record of warranty/guarantee expenses for sales of the subject merchandise.

c. State how you calculated these expenses. Identify your source of data.

d. If the expenses were incurred only for certain customers provide customer specific information.

e. If the expenses were only incurred on some of the subject merchandise, or if expenses vary among product types, identify the product types and explain any allocation method you have used.

f. Explain your calculation of warranty/guarantee costs in the transaction-by-transaction basis.

RESPONSE:

Nam Kim Steel did not provide any warranties, guarantees, technical assistance and services, as provided for by law and/or in the sales contract between Nam Kim and Malaysian customers. Thus, this adjustment is not applicable.

10. Differences in commissions paid in respect of the sales of subject merchandise within Year 1, Year 2 and POI:

a. Provide the amount of commission expenses paid to unrelated or related sellers and explain the terms under which commissions are given.

RESPONSE:

Not applicable. Nam Kim Steel did not pay any commission.

11. Currency conversions:

In order to compare export sales prices with domestic sales prices a conversation of currency will be required. Fluctuations in exchange rates can only be taken into account under certain circumstances, i.e., when a fluctuation becomes a "sustained" movement.

a. If you claim an adjustment for currency conversion, provide detailed information on the movement in exchange rates in your countries.

b. Provide the official central bank exchange rates specifying the official daily buying and selling rates of exchange used for the foreign

currencies concerned during the last two years in connection with the export of goods and services.

c. Provide the exchange rates used by your company for converting the payment of export sales and the sources of these rates. Explain the adjustments you claimed in the transaction-by-transaction basis.

d. If you brought foreign currency in advance of the date of sale, provide the details of the forward purchase and explain whether the purchase was specifically linked to export transactions. State the exchange rates of the forward purchase for the specific sales concerned in the transaction-by-transaction basis.

RESPONSE:

The exchange rate applied in Nam Kim Steel's accounting system is determined as follows: [***].

All export sales to the Malaysian market were made in US Dollars (USD). The conversion of export sales transactions from USD into the accounting currency, Vietnam Dong (VND), is recorded in **Table E-3.2 (MY-SALE)** using the applicable exchange rate described above.

For the settlement of export sales, the exchange rate applied to the payment received is [***]. Nam Kim Steel did not enter into any forward foreign currency purchase transactions specifically linked to individual export sales during the period concerned.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

12. Identify the general ledger accounts where the expense is recorded.

RESPONSE:

Nam Kim Steel reports the listed charges that are included in the export price as follows: [***].

13. Other factors:

Adjustments may also be made for differences in other factors not provided for under paragraph E-2.2 to E-2.12, if can be demonstrated that such adjustments affect price comparability and have historically been utilised. In particular, customers consistently pay different prices in the Malaysian market because of the differences in such factors.

RESPONSE:

Not applicable. Nam Kim Steel is not claiming for any other adjustment other than those mentioned above.

E-3 Format of Submission

1. Provide information on **all customer** (unrelated and related customer) **in Malaysia market** and **appropriate third countries**. For this purpose, use Excel format as per Table E-3.1.

RESPONSE:

Please refer to **Table E-3.1 (MY-CUST)**.

Table E-3.1: Export Sales - Customer Listing (EXP-CUST)

Field name	Field description	Explanation
Y/Q	Year/quarter	Sales transaction of Year 1, Year 2 and POI
TRCOMP-NAME	Trading company name	Names of your trading/intermediary company
TRCOMP-NO	Trading company code number	Trading/Intermediary company's code number used for each of your customers
TRCOMP-REL	Trading company relation	"U" for unrelated trading/intermediary company; and "R" for related trading/intermediary company
CUST-NAME	Customer name	Customer name
CUST-NO	Customer code number	Customer code number
CUST-CO	Customer country	Customer country
CUST-ADD	Customer address	Complete address of your customers
CUST-REL	Customer relation	"U" for unrelated customer and "R" for related customer
CUST-LEV	Customer level of trade	Code "1" for original equipment manufacturer (OEM); code "2" for distributor; code "3" for retailer; code "4" for end-user; and "5" for others (specify the customer type)
PDT-DES	Product description	Product description of the subject merchandise i.e., product name
PDT-CODE	Product sales code	Product sales code used for the subject merchandise
PDT-GRADE	Product grade	Product grade of subject merchandise

Field name	Field description	Explanation
PDT-CLASS	Product classification	Product classification (Prime or Non-Prime) according to producer/exporter
PDT-SPEC	Product specification	Product specification of the subject merchandise i.e., technical characteristic or any other relevant specification
PDT-USAGE	Product usage	Product usage of the subject merchandise
QTY	Quantity	Quantity of the subject merchandise sold (specify the unit of measurement used)
SM-TURNOVER	Subject merchandise's turnover	Total turnover of the subject merchandise sold per customer (specify currency used)
TOT-TURNOVER	Total turnover of all product sold	Total turnover per customer for all products sold by your company (specify currency used)
SALES-DISC	Sales discounts	Total discounts granted to the customers of the subject merchandise (specify currency used)
REB	Rebates	Total rebates granted to the customers of the subject merchandise (specify currency used)
PAY- TERM	Payment terms	Agreed payment terms (e.g., 30, 60, 90 days, etc.)
DEL- TERM	Delivery terms	Agreed terms of delivery (e.g., FOB, C&F, CIF, etc.)

2. Provide information on transaction-by-transaction basis relating to **sales of subject merchandise** (produced and sold by your company) to **all customers** (unrelated and related customer) **in Malaysia market** during the period of **Year 1, Year 2** and **POI**. For this purpose, use Excel format as per Table E-3.2.

RESPONSE:

Please refer to **Table E-3.2 (MY-SALE)**.

Table E-3.2: Export Sales to Malaysia Listing (MY-SALE)

Field name	Field description	Explanation
SEQ-NO	Sequential number	Sequential number for each transaction, or line item, in the sales listing (i.e., the first transaction is “1”, the second is “2”, and so on)
ACC-NO	Accounting ID number	Accounting ID or document number as recorded in accounting system
CODE	Company internal coding system	Code used for the product
TRCOMP-NAME	Trading company name	Names of your trading/intermediary company
TRCOMP-NO	Trading company number	Trading/Intermediary company’s code number used for each of your customers
TRCOMP-REL	Trading company relation	“U” for unrelated trading/intermediary company; and “R” for related trading/intermediary company
INV-NO	Invoice number	Actual invoice number
INV-DATE	Invoice date	Actual invoice date of the transaction
CUST-NAME	Customer name	Customer name
CUST-NO	Customer code number	Customer code number as defined in file “EXP-CUST”
CUST-REL	Customer relation	“U” for unrelated customer; and “R” for related customer
CUST-LEV	Customer level of trade	Code “1” for original equipment manufacturer (OEM); code “2” for distributor; code “3” for retailer; code “4” for end-user; and “5” for others (specify the customer type)
PDT-DES	Product description	Product description of the subject merchandise i.e., product name
PDT-CODE	Product sales code	Product sales code used for the subject merchandise

Field name	Field description	Explanation
PDT-GRADE	Product grade	Product grades of the subject merchandise
PDT-CLASS	Product classification	Product classification (Prime or Non-Prime) according to producer/exporter
PDT-SPEC	Product specification	Product specification of the subject merchandise i.e., technical characteristic or any other relevant specification
PDT-USAGE	Product usage	Product usage of the subject merchandise
H.S.	H.S. Codes	Harmonized System Codes of the subject merchandise
PHY-DIF	Physical difference	Market value of the physical differences
ORD-NO	Sales order/ contract number	Sales order or contract number of the transaction concerned
ORD-DATE	Date of sales order /contract	Date on which the sales order/contract was issued
SHIP-DATE	Shipment Date	The date of the subject merchandise was shipped out
LAD-NO	Bill of lading number	Reference number of the bill of lading or other transport document
DEL-TERM	Delivery terms	Agreed terms of delivery (e.g., FOB, C&F, CIF, etc.)
PAY-TERM	Payment terms	Agreed payment terms (e.g., 30, 60, 90 days, etc.)
DATE-PAY	Date of payment received	Date on which the company received payment
MODE-PAY	Mode of payment	Mode of payment made by customer (e.g., cash, bank draft, telegraphic transfer (TT), letter of credit (LC), etc.)
QTY	Quantity	Quantity of the subject merchandise for the transaction (specify the unit of measurement used)

Field name	Field description	Explanation
GR-VAL	Gross invoice value	Gross invoice value inclusive of sales tax/VAT (specify currency used)
SALE-DISC	Sales discounts	Sales discount deducted on the invoice referred for the transaction (specify currency used)
SALES-TAX	Sales tax/VAT	Actual amount of sales tax/VAT charged to customer (specify currency used)
NET-VAL	Net invoice value	Net invoice value of the transaction after sales discount and sales tax/VAT on the invoices, in the currency of sale (specify currency used)
CURR	Invoice currency	Currency of sale for the transaction
EXCH	Exchange rate	Exchange rate used to convert the transaction currency into the currency of your accounting records
NET-INV	Net invoice value recorded in accounting records	Net invoice value of the transaction after sales discount and sales tax/VAT, in the currency as it entered in your accounting records (specify currency used)
DOC-TYPE	Type of document	Type of document: “CN” for credit note; and “DN” for debit note (if applicable for each transaction or line item)
CN/DN-NO	Credit/debit note number	Credit/debit note number issued for the transaction concerned
CN/DN DATE	Credit/debit note date	Date of credit/debit note issued for the transaction concerned
CN/DN-CAT	Credit/debit note category	State credit/debit category (i.e., discount, rebate, sales return, price adjustment, quantity adjustment)
REMARK	Credit/debit note remark	Reason for issuing the credit/debit note (e.g., cash discount, loyalty discount, bulk purchase, rebate, sales return, quality issue and other)

Field name	Field description	Explanation
CN/DN-QTY	Quantity credited/debited	Quantity credited/debited as appropriate (specify the unit of measurement used)
SALES-RETURN	Sales return value	Sales return value in the currency of sales (specify currency used)
OTH-DISC	Other discounts	Actual amount of discount that was not deducted from the invoice. If more than one type of other discount, insert additional column of data at this point for the additional types of other discounts (specify the types and currency used). Do not aggregate the discounts
REB	Rebate	Actual amount of rebate granted to customer. If more than one type of rebate, insert additional column of data at this point for the additional types of rebates (specify the types and currency used). Do not aggregate the rebates
NET-QTY	Net quantity	Net quantity after credit/debit adjustment (specify the unit of measurement used)
NET-VAL CN/DN	Net sales value after credit/debit adjustments	Net sales value after all credit/debit notes adjustments, including the sales discounts, sales returns, sales tax/VAT and all other applicable adjustments as recorded in your accounting records (specify currency used)
CIF	CIF value	CIF value of the subject merchandise at Malaysian border, i.e., duty unpaid, in the currency of your accounting records. If the product is not sold on CIF basis, please determine the CIF value on the basis of the best information available to you. Details of how the adjustment of CIF level was made should be provided. (specify currency used)
REB-VAT	Rebate VAT	Actual amount of rebate or refund on VAT (specify currency used)
EXP-DUTY	Export duty	Actual amount of export duty paid (specify currency used)
INL-FRE	Inland freight cost in exporting country	Amount of inland freight cost in exporting country (specify currency used)

Field name	Field description	Explanation
OCE-FRE	Ocean freight cost	Amount of ocean freight cost (specify currency used)
INS	Insurance	Amount of insurance cost (specify currency used)
MY-FRE	Freight in Malaysia	Amount of inland freight paid to Malaysia port (specify currency used)
CHAR	Handling charges	Amount of handling, loading and ancillary expenses (specify currency used)
PACK	Packing expenses	Amount of packing expenses (specify currency used)
BANK	Bank charges	Bank charges related to the transaction, e.g., document fee, bank commission, currency exchange, etc. (specify currency used)
CREDIT	Credit cost	Cost of providing credit to your customer (specify currency used)
WARR	Warranty/ guarantee	Amount of warranty and guarantee expenses (specify currency used)
AFT-SALE	Expenses for technical assistance	Amount of expenses for technical assistance and services (specify currency used)
COMM	Commission	Amount of commission paid related to the sales of the subject merchandise. If more than one type of commission is paid, insert additional column of data at this point for the additional types of commission paid (specify the types and currency used). Do not aggregate the commission.
CONV	Currency conversion	Amount of adjustment for currency conversion (specify currency used)
OTHER	Other adjustments	Any other allowance (please specify)

3. Provide information on transaction-by-transaction basis relating to **sales of subject merchandise** (produced and sold by your company) to **all customers** (unrelated and related customer) **in appropriate third countries** during the

period of **Year 1, Year 2** and **POI**. For this purpose, use Excel format as per Table E-3.3.

RESPONSE:

Please refer to **Table E-3.3 (TRC-SALE).**

Table E-3.3: Export Sales to **Appropriate Third Countries** Listing (TRC-SALE)

Field name	Field description	Explanation
SEQ-NO	Sequential number	Sequential number for each transaction, or line item, in the sales listing (i.e., the first transaction is "1", the second is "2", and so on)
ACC-NO	Accounting ID number	Accounting ID or document number as recorded in accounting system
CODE	Company internal coding system	Code used for the product
TRCOMP-NAME	Trading Company name	Names of your trading/intermediary company
TRCOMP-NO	Trading Company number	Trading/Intermediary company's code number used for each of your customers
TRCOMP-REL	Trading Company relation	"U" for unrelated trading/intermediary company; and "R" for related trading/intermediary company
INV-NO	Invoice number	Actual invoice number
INV-DATE	Invoice date	Actual invoice date of the transaction
CUST-NAME	Customer name	Customer name
CUST-NO	Customer code number	Customer code number as defined in file "EXP-CUST"
CUST-REL	Customer relation	"U" for unrelated customer; and "R" for related customer
CUST-CO	Customer country	Customer country

Field name	Field description	Explanation
CUST-LEV	Customer level of trade	Code “1” for original equipment manufacturer (OEM); code “2” for distributor; code “3” for retailer; code “4” for end-user; and “5” for others (specify the customer type)
PDT-DES	Product description	Product description of the subject merchandise i.e., product name
PDT-CODE	Product sales code	Product sales code used for the subject merchandise
PDT-GRADE	Product grade	Product grades of the subject merchandise
PDT-CLASS	Product classification	Product classification (Prime or Non-Prime) according to producer/exporter
PDT-SPEC	Product specification	Product specification of the subject merchandise i.e., technical characteristic or any other relevant specification
PDT-USAGE	Product usage	Product usage of the subject merchandise
H.S.	H.S. Codes	Harmonized System Codes of the subject merchandise
PHY-DIF	Physical difference	Market value of the physical differences
ORD-NO	Sales order/ contract number	Sales order or contract number of the transaction concerned
ORD-DATE	Date of sales order /contract	Date on which the sales order/contract was issued
SHIP-DATE	Shipment Date	The date the subject merchandise was shipped out
LAD-NO	Bill of lading number	Reference number of the bill of lading or other transport document
DEL-TERM	Delivery terms	Agreed terms of delivery (e.g., FOB, C&F, CIF, etc.)
PAY-TERM	Payment terms	Agreed payment terms (e.g., 30, 60, 90 days, etc.)

Field name	Field description	Explanation
DATE-PAY	Date of payment received	Date on which the company received payment
MODE-PAY	Mode of payment	Mode of payment made by customer (e.g., cash, bank draft, telegraphic transfer (TT), letter of credit (LC), etc.)
QTY	Quantity	Quantity of the subject merchandise for the transaction (specify the unit of measurement used)
GR-VAL	Gross invoice value	Gross invoice value inclusive of sales tax/VAT (specify currency used)
SALE-DISC	Sales discounts	Sales discount deducted on the invoice referred for the transaction (specify currency used)
SALES-TAX	Sales tax/VAT	Actual amount of sales tax/VAT charged to customer (specify currency used)
NET-VAL	Net invoice value	Net invoice value of the transaction after sales discount and sales tax/VAT on the invoices, in the currency of sale (specify currency used)
CURR	Invoice currency	Currency of sale for the transaction
EXCH	Exchange rate	Exchange rate used to convert the transaction currency into the currency of your accounting records
NET-INV	Net invoice value recorded in accounting records	Net invoice value of the transaction after sales discount and sales tax/VAT, in the currency as it entered in your accounting records (specify currency used)
DOC-TYPE	Type of document	Type of document: “CN” for credit note; and “DN” for debit note (if applicable for each transaction or line item)
CN/DN-NO	Credit/debit note number	Credit/debit note number issued for the transaction concerned
CN/DN DATE	Credit/debit note date	Date of credit/debit note issued for the transaction concerned

Field name	Field description	Explanation
CN/DN-CAT	Credit/debit note category	State credit/debit category (i.e., discount, rebate, sales return, price adjustment, quantity adjustment)
REMARK	Credit/debit note remark	Reason for issuing the credit/debit note (e.g., cash discount, loyalty discount, bulk purchase, rebate, sales return, quality issue and other)
CN/DN-QTY	Quantity credited/debited	Quantity credited/debited as appropriate (specify the unit of measurement used)
SALES-RETURN	Sales return value	Sales return value in the currency of sales (specify currency used)
OTH-DISC	Other discounts	Actual amount of discount that was not deducted from the invoice. If more than one type of other discount, insert additional column of data at this point for the additional types of other discounts (specify the types and currency used). Do not aggregate the discounts
REB	Rebate	Actual amount of rebate granted to customer. If more than one type of rebate, insert additional column of data at this point for the additional types of rebates (specify the types and currency used). Do not aggregate the rebates
NET-QTY	Net quantity	Net quantity after credit/debit adjustment (specify the unit of measurement used)
NET-VAL CN/DN	Net sales value after credit/debit adjustments	Net sales value after all credit/debit notes adjustments, including the sales discounts, sales returns, sales tax/VAT and all other applicable adjustments as recorded in your accounting records (specify currency used)
CIF	CIF value	CIF value of the subject merchandise at Malaysian border, i.e., duty unpaid, in the currency of your accounting records. If the product is not sold on CIF basis, please determine the CIF value on the basis of the best information available to you. Details of how the adjustment of CIF level was made should be provided. (specify currency used)
REB-VAT	Rebate VAT	Actual amount of rebate or refund on VAT (specify currency used)

Field name	Field description	Explanation
EXP-DUTY	Export duty	Actual amount of export duty paid (specify currency used)
INL-FRE	Inland freight cost in exporting country	Amount of inland freight cost in exporting country (specify currency used)
OCE-FRE	Ocean freight cost	Amount of ocean freight cost (specify currency used)
INS	Insurance	Amount of insurance cost (specify currency used)
FRE-INT	Freight in international port	Amount of inland freight paid to international port (specify currency used)
CHAR	Handling charges	Amount of handling, loading and ancillary expenses (specify currency used)
PACK	Packing expenses	Amount of packing expenses (specify currency used)
BANK	Bank charges	Bank charges related to the transaction, e.g., document fee, bank commission, currency exchange, etc. (specify currency used)
CREDIT	Credit cost	Cost of providing credit to your customer (specify currency used)
WARR	Warranty/ guarantee	Amount of warranty and guarantee expenses (specify currency used)
AFT-SALE	Expenses for technical assistance	Amount of expenses for technical assistance and services (specify currency used)
COMM	Commission	Amount of commission paid related to the sales of the subject merchandise. If more than one type of commission is paid, insert additional column of data at this point for the additional types of commission paid (specify the types and currency used). Do not aggregate the commission.
CONV	Currency conversion	Amount of adjustment for currency conversion (specify currency used)

Field name	Field description	Explanation
OTHER	Other adjustments	Any other allowance (please specify)

SECTION F: COSTS

F-1 Accounting System and Policies

Please reply as comprehensively as possible to each of the following questions. In case where explanations are requested, be as thorough as possible.

A detailed understanding of the accounting and financial practices is necessary to analyse the reporting and allocation of expenses.

1. Describe the company's accounting and financial reporting practices, including normal corporate accounting period.

RESPONSE:

Nam Kim Steel's standard corporate accounting and financial period begins on January 1st (01/01) and ends on December 31st (31/12) of each calendar year.

A description of Nam Kim Steel's accounting and financial reporting practices is provided in the Company's separated and consolidated audited financial statements, which are contained in **Exhibit F-1.1 – Financial Statements_CONF.**

2. State whether the company's financial accounting practices are in accordance with generally accepted accounting principles (GAAP) practised in your country.

RESPONSE:

Yes, the company's financial accounting practices are in accordance with generally accepted accounting principles (GAAP) practised in Vietnam.

3. In the event that any of the accounting methods used by the company has changed over the last three financial years, provide a detailed explanation of the changes including the effective date of each change and the reasons for the change.

RESPONSE:

Not applicable. There was no change in Nam Kim Steel's accounting practices and/or policies over the last three years.

4. Provide a flowchart illustrating the company's financial accounting books and record keeping system. Indicate in the flowchart all subsidiary ledgers and reports generated from the company's financial accounting system (e.g., subsidiary ledgers maintained for raw materials purchases, inventories, sales, account receivables). Show in the flowchart how data from the company's financial accounting system are summarised in its financial statements.

RESPONSE:

Please refer to **Exhibit F-1.4.1 – Accounting Flowchart_CONF** and **Exhibit F-1.4.2 – SAP ERP System Description_CONF**.

[Note: **Exhibit F-1.4.1** and **Exhibit F-1.4.2** are provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

5. Explain the financial accounting practices with regard to:

   a. The valuation method for:

      i. raw materials, work-in-progress and finished products inventories (e.g., first-in, first-out ("FIFO"), last-in, first-out ("LIFO"), weighted average).

RESPONSE:

Nam Kim evaluates raw material, work-in-process and finished goods inventories by using the [method].

Inventory value of goods delivered = [Formula]

      ii. inventory write-off and write-down for raw material and finished goods.

RESPONSE:

Nam Kim does not have any inventory write-offs. For inventory write-downs/provisions for impairment of raw materials and finished goods, Nam Kim values inventory using the [method].

      iii. damaged or substandard products generated at various stages of production.

RESPONSE:

The damaged or substandard products generated at various stages of production are absorbed into manufacturing cost as standard product.

      iv. non-current assets: For each class of non-current assets, provide the average useful life, and specify the depreciation method and depreciation rate applied.

RESPONSE:

Nam Kim Steel uses [method] for depreciation and amortization on non-current assets:

Non-current assets	Useful life
[Asset]	[xxx] – [xxx] years
[Asset]	[xxx] – [xxx] years
[Asset]	[xxx] – [xxx] years
[Asset]	[xxx] – [xxx] years
[Asset]	[xxx] – [xxx] years
[Asset]	[xxx] – [xxx] years
[Asset]	[xxx] – [xxx] years

b. Costing methodology, including the method of allocating costs shared among other products or production processes.

RESPONSE:

Nam Kim Steel allocates costs based on [method].

c. Treatment of foreign exchange gains and losses.

RESPONSE:

Foreign exchange gains are accounted into revenue of financial activity upon actual difference incurred for its activities.

Foreign exchange losses are accounted into financial expense upon actual difference incurred for its activities.

d. Capitalisation and amortisation of expenses, including general and interest expenses.

RESPONSE:

During the POI, the Company [***]. All interest expenses incurred in connection with ordinary business and production activities were recognized as [expense] in the period in which they were incurred, as recorded in Account [xxx].

General administrative expenses refer to all expenses related to the administration and management of the Company that are not attributable to any specific production or construction activity. Therefore, general administrative expenses are [***]. Such expenses are recognized as [expense] in the period in which they are incurred, as recorded in Account [xxx].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

e. Provision for bad or doubtful debts.

RESPONSE:

Regarding bad debts (overdue), during the POI, Nam Kim Steel had provisioned for it according to Article 6, Clause 2, Point a of Circular No. 48/2019/TT-BTC dated August 08, 2019 of the Vietnam Ministry of Finance, as said:

- 30% of the value of overdue debts from over 06 months to less than a year;
- 50% of the value of overdue debts from 01 (one) year to under two years;
- 70% of the value of overdue debts from 02 (two) years to under 03 (three) years;
- 100% of the value of overdue debts from 03 (two) years and more;

f. Expenses for idle equipment and/or plant shut down.

RESPONSE:

Not applicable. Nam Kim Steel did not incur expense for idle equipment and/or plant shut down during the POI.

g. Cost of plant disclosure.

RESPONSE:

Not applicable. Nam Kim Steel did not incur cost of plant disclosure.

h. Restructuring costs.

RESPONSE:

Not applicable. Nam Kim Steel did not incur restructuring costs.

i. The effects of inflation on financial statement information.

RESPONSE:

Not applicable. Nam Kim Steel did not apply the effects of inflation on the financial statement.

6. Explain your company's accounting treatment for incidental revenue (e.g., revenue from the sale of scrap, by-products, co-product or other income).

RESPONSE:

Scraps are [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

7. Describe how the costs associated with by-products, co-products, and scrap are allocated, how the related revenue is recognised and accounted for; and whether such revenue is offset against the cost of production or recognised separately in the financial statements.

RESPONSE:

Scraps are [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

8. Provide in English or accompanied by English translations as described in the General Instructions; financial documents for the most recent three completed financial years:

    a. Chart of accounts and trial balance.

RESPONSE:

Please refer to **Exhibit F-1.8.1 - Chart of Accounts_CONF** and **Exhibit F-1.8.2 – Trial Balance_CONF**.

[Note: **Exhibit F-1.8.1** and **Exhibit F-1.8.2** are provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

    b. Audited, consolidated and unconsolidated financial statements (including notes to the accounts and auditor's opinion).

RESPONSE:

Please refer to **Exhibit F-1.1** for audited consolidated and separated financial statements during 2023 – 2025. [Name of auditor] is the auditor of Nam Kim Steel Joint Stock Company during the POI.

    c. Internal financial statements or profit and loss reports of any kind that are prepared and maintained in the normal course of business for the like product and subject merchandise or, in the absence of such reports, for the product line that corresponds most closely to the definition of the like product and subject merchandise.

RESPONSE:

Not applicable. Nam Kim Steel did not issue any internal financial statements or profit and loss reports of any kind that are prepared and maintained in the normal course of business for the PUI or for the product line that corresponds most closely to the definition of the PUI.

    d. Financial statements or other relevant documents of all related companies involved in the production or sale of the like product and subject merchandise in the domestic market and Malaysian market.

RESPONSE:

Not applicable. Nam Kim Steel does not have any related company involved in the production or sale of the PUI in the domestic market and Malaysian market.

9. Describe the cost accounting system used by the company to record the production cost of the like product and subject merchandise. The description should include among others:

    a. A general description of the company's cost accounting method as it relates to allocating production costs to individual unit of the like product

and subject merchandise (e.g., job order, process costing). State whether the cost accounting system is an integral part of the financial accounting system used for the preparation of financial statements.

RESPONSE:

Nam Kim Steel collects all costs and/or expenses related to production of the PUI into account [xxx];

- [xxx] – [Costs]
- [xxx] – [Costs]
- [xxx] – [Costs]

After accumulating these production costs, Nam Kim Steel then [methodology].

Cost accounting system is an integral part of the financial accounting system used for the preparation of financial statements and therefore NKG does not value any difference for cost accounting purposes than for financial accounting purposes.

b. A description of the company's standard cost or cost budget system, if applicable, including:

RESPONSE:

Nam Kim Steel has used [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

i. the types of variances recorded in the company's cost accounting system and how they are used in the management reporting process;

RESPONSE:

All of the variances are recorded in account [xxx]. These variances are allocated proportionally among [methodology].

ii. the period for which the variances are calculated and recorded;

RESPONSE:

Variances are recorded in the [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

iii. the methods used to develop the company's standard costs; and

RESPONSE:

Nam Kim applied the [method].

iv. the frequency of standard cost revisions, including the date of the most recent revision.

RESPONSE:

Standard cost is evaluated to revise [period].

The latest revision is [date and period].

c. Whether standard costs were used in the response and whether all variances between standard and actual costs have been fully allocated. Explain in detail the allocation method used, as well as any significant or unusual cost variances that occurred.

RESPONSE:

All variances between standard and actual costs [***].

No abnormal cost variances arose during the POI.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

d. A list of direct cost centres or cost drivers in the cost accounting system. Briefly describe the segment of production activity attributed to the listed cost centres.

RESPONSE:

The costs are accumulated and allocated [***].

Nam Kim Steel allocates total of these production costs by [methodology].

Please refer to **Exhibit F-1.9.d- Direct Cost_CONF** for a description of the cost accounting system.

[Note: The above information in asterisk and **Exhibit F-1.9.d** are provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

e. Methods and basis used to allocate costs to the company's organisational units (e.g., parent company charges to subsidiaries, corporate charges to specific plants, product division, inter-plant allocations).

RESPONSE:

The costs are accumulated and allocated [methodology].

f. Methods used to account for wastage, scrap, damaged or sub-standard products generated at each stage of the production process. Also state the method used to account for rework.

RESPONSE:

Scraps are [***].

Nam Kim does not intentionally produce non-prime products. However, quality issues may arise during the production process, resulting in products that do not meet the standards for prime products and are therefore sold at lower prices. Accordingly, [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

g. Valuation and recording methods regarding the cost of sales, raw materials, work-in-progress and finished goods inventories for the audited financial statements.

RESPONSE:

For cost of goods sold, inventories of raw materials and finished goods are valued using the [method].

In addition, Nam Kim Steel uses the [system] to account for its inventories.

h. A list of costs that are valued or treated differently for cost accounting and financial accounting purposes (i.e., for preparation of financial statements). Identify the differences and explain the reasons for it.

RESPONSE:

Not applicable. Nam Kim Steel does not have any cost that is value or treated differently for cost accounting and financial accounting purposes.

10. Indicate the address where the accounting records concerning the activities of the company are located. If the records are maintained in different locations, indicate which records are kept at what location.

RESPONSE:

Nam Kim Steel's accounting records are held at the [location], which is located at:

Former address (before July 1, 2025):
[address]

Current address (from July 1, 2025):
[address]

All source documents that NKG relied in preparing its response to this part of the questionnaire are from the Accounting Department and they are held in [location].

11. Provide details of the net profit to sale ratio (net profit margin) realised over the last two years for the profit centre which includes the like product and subject merchandise. How does this compare to the profit ratio for the like product and subject merchandise?

RESPONSE:

Not applicable. Nam Kim Steel does not apply net profit to sale ratio (net profit margin) realised over the last two years for the profit centre which includes the PUI.

12. Indicate level of profit that the company has achieved for the like product sold on the domestic market and explain the basis for determining the profit.

RESPONSE:

The level of profit the company achieves for products sold domestically depends on market conditions. The company does not set specific prices for its products; instead, prices fluctuate based on market dynamics. Therefore, profits also vary, increasing or decreasing depending on market demand and competition at any given time.

The company's profit is determined based on [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

F-2 Purchase of Raw Materials and Finished Goods

1. Based on format as per Table F-2.1, provide information on transaction-by-transaction basis relating to **purchase of raw materials and finished goods** for the **like product** and **subject merchandise** during **Year 1, Year 2** and **POI**. For this purpose, use Excel format as per Table F-2.1.

RESPONSE:

Please refer to **Table F-2.1 (RAWMAT-PUR)**.

2. In the event that your company purchased the like product and subject merchandise from other sources, indicate the country or countries of origin and the name(s) of the supplier(s) of the like product and subject merchandise sold by your company. Give description of how the origin of the product is determined.

RESPONSE:

Not applicable. Nam Kim Steel does not purchase the like product and subject merchandise from other suppliers for sale.

Table F-2.1: Raw Materials and Finished Goods Purchase Listing (RAWMAT/FG-PUR)

Field name	Field description	Explanation
SEQ-NO	Sequence number	Sequential number for each transaction, or line item, in the purchase listing (i.e., the first transaction is “1”, the second is “2”, and so on)
ACC-NO	Accounting ID number	Accounting ID or document number as recorded in accounting system
CODE	Company internal coding system	Code used for the product purchased
INV-NO	Invoice number	Actual invoice number
INV-DATE	Invoice date	Actual invoice date of the transaction
SU-NAME	Supplier name	Supplier name
SU-CO	Supplier country	Supplier country

Field name	Field description	Explanation
SU-REL	Supplier relation	“U” for unrelated supplier; and “R” for related supplier
PR-NAME	Producer/ Manufacturer name	For purchases of finished goods were made through trader or distributor, state the name of producer/manufacturer
ORD-NO	Purchase order/contract number	Purchase order or contract number of the transaction concerned
ORD-DATE	Date of purchase order /contract	Order date for which the purchase order/contract was issued
RM/FG-CAT	Raw materials /Finished goods category	“RM” for raw materials or “FG” for finished goods
RM/FG-TYPE	Raw materials /Finished goods type	Types of raw materials/finished goods
QTY	Quantity	Quantity of raw materials/finished goods purchased (specify the unit of measurement used)
GR-VAL	Gross invoice value	Gross invoice value of the purchase, inclusive of sales tax/VAT (specify currency used)
PURC-DISC	Purchase discount	Purchase discount deducted on the invoice referred for the transaction (specify currency used)
SALES-TAX	Sales tax/VAT	Actual amount of sales tax/VAT charged on the supplier's invoice (specify currency used)
NET-VAL	Net invoice value	Net invoice value of the transaction after purchase discount and sales tax/VAT on the invoices, in the currency of purchase (specify currency used)
CURR	Invoice currency	Currency in which the purchase transaction was made
EXCH	Exchange rate	Exchange rate used for the conversion of the currency of purchase to the currency of your accounting records

Field name	Field description	Explanation
NET-INV	Net invoice value recorded in accounting records	Net invoice value of the transaction after purchase discount and sales tax/VAT, in the currency as it entered in your accounting records (specify currency used)
DOC-TYPE	Type of document	Type of document: "CN" for credit note; and "DN" for debit note (if applicable for each transaction or line item)
CN/DN-NO	Credit/debit note number	Credit/debit note number issued for the transaction concerned
CN/DN DATE	Credit/debit note date	Date of credit/debit note issued for the transaction concerned
CN/DN-CAT	Credit/debit note category	Credit/debit category (i.e., discount, rebate, purchase return, price adjustment, quantity adjustment)
REMARK	Credit/debit notes remark	Reason for issuing the credit/debit notes (e.g., cash discount, loyalty discount, bulk purchase, rebate, purchase return, quality issue and other)
CN/DN-QTY	Quantity credited/debited	Quantity credited/debited as appropriate (specify the unit of measurement used)
PURC-RETURN	Purchase return value	Purchase return value in the currency of purchase (specify currency used)
OTH-DISC	Other discounts	Actual amount of discount that was not deducted from the invoice. If more than one type of other discount, insert additional column of data at this point for the additional types of other discounts (specify the types and currency used). Do not aggregate the discounts
REB	Rebate	Actual rebate received for the transaction (specify currency used)
NET-QTY	Net quantity	Net quantity after credit/debit adjustment (specify the unit of measurement used)
NET-VAL CN/DN	Net purchase value after credit/debit adjustments	Net purchase value after all credit/debit notes adjustments, including the purchase discounts, purchase returns, sales

Field name	Field description	Explanation
		tax/VAT and all other applicable adjustments as recorded in your accounting records (specify currency used)
DATE-PAY	Date of payment	Date on which the company made payment
MODE-PAY	Mode of payment	Mode of payment made to the supplier (e.g., cash, bank draft, telegraphic transfer (TT), letter of credit (LC), etc.)
PAY-TERM	Payment terms	Agreed payment terms (e.g., 30, 60, 90 days, etc.)
DEL-TERM	Delivery terms	Agreed terms of delivery (e.g., FOB, C&F, CIF, etc.)
DEL-CS	Delivery costs	Delivery costs either as actual costs or as a function of the invoice value (%) or volume (costs per unit)
OTHER	Other adjustments	Any other adjustments (please specify)

F-3 Cost to Make and Sell

1. Complete Table F-3.1 showing the cost of production/trading (use the currency as per accounting records). The description of each item can be specified to suit the nomenclature of your cost accounting system. For this purpose, use Excel format as per Table F-3.1.

RESPONSE:

Please refer to **Table F-3.1 (COP GL)**.

Table F-3.1: Cost of Production

Item	Like product and Subject Merchandise					All products				
	Year 1/ Year 2/ POI *(specify currency and unit of measurement)*					Year 1/ Year 2/ POI *(specify currency and unit of measurement)*				
	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total
Total quantity of production										
Variable manufacturing costs: Raw materials *(specify)* Direct labour Variable manufacturing overhead *(specify)* Others *(specify)*										
A. Total variable manufacturing costs										

Item	Like product and Subject Merchandise					All products				
	Year 1/ Year 2/ POI *(specify currency and unit of measurement)*					Year 1/ Year 2/ POI *(specify currency and unit of measurement)*				
	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total
Fixed manufacturing costs: Indirect labour Fixed manufacturing overhead *(specify)* Other *(specify)*										
B. Total fixed manufacturing costs										
Work in progress: (+) Opening work in progress (-) Closing work in progress										
C. Total work in progress										
Total cost of production (A+B+C)										

2. If your company is vertically integrated and some of raw materials used in the final production of the like product and subject merchandise, are produced "in-house" or by related company, provide another table as per format of Table F-3.1, for each upstream product extracted or manufactured, up to the basic raw materials identified in Table F-3.1.

RESPONSE:

Nam Kim operates an integrated production process [products], and [products] are used as raw materials in the production of GL, the subject merchandise.

Accordingly, we have prepared separate tables in the format of **Table F-3.1** for [products], covering Y1, Y2 and the POI.

However, [***].

Please refer to **Table F-3.1 (COP ***)** and **Table F-3.1 (COP ***)**.

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

3. Complete Table F-3.1 showing the summary of the costs of production/trading, for the like product and subject merchandise (use the currency as per accounting records).

RESPONSE:

Please refer to **Table F-3.1 (COP GL)**.

4. Provide (in the format shown at Table F-3.2) the actual unit cost to make and sell for the like product and subject merchandise. Your actual unit of cost to

make and sell for the like product and subject merchandise calculations are to be presented according to quarterly basis. Provide the supporting documents and worksheets that substantiate your calculations. It is essential to show all costs associated with the like product and subject merchandise sold during Year 1, Year 2 and POI. For this purpose, use Excel format as per Table F-3.2.

RESPONSE:

Please refer to **Table F-3.2 (Cost to Make and Sell Per Unit).** Please note the following: [***].

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

Table F-3.2 – Cost to Make and Sell Per Unit

Provide data for the like product and subject merchandise sold during **Year 1, Year 2** and **POI**.

		Total all products	Domestic market				Export market (Malaysia)				Export market (Other than Malaysia)				Total sales (Domestic market + Export market)			
			Sales during Year 1 / Year 2 / POI (Quarterly)				Sales during Year 1 / Year 2 / POI (Quarterly)				Sales during Year 1 / Year 2 / POI (Quarterly)				Sales during Year 1 / Year 2 / POI			
			Unrelated customers		Related customers		Unrelated customers		Related customers		Unrelated customers		Related customers		Unrelated customers		Related customers	
		Year 1, Quarter 1	Like product	Other products	Like product	Other products	Subject merchandise	Other products	Subject merchandise	Other products	Subject merchandise	Other products	Subject merchandise	Other products	Like product/ Subject merchandise	Other products	Like product/ Subject m merchandise	Other products
A.	**Total quantity of sales**																	
B.	**Total net value of sales**																	
C.	**Cost of goods sold:**																	
	(1) Variable Manufacturing Costs (1(a)+1(b)+1(c))																	
	(a) Raw materials (i+ii):																	
	(i) Local																	
	(ii) Imported																	
	(b) Direct labour																	
	(c) Other (Specify)																	
	(2) Fixed Manufacturing Costs (2(a)+2(b))																	
	(a) Depreciation																	
	(b) Other Mfg. Overheads (specify)																	
D.	**Total cost of goods sold (C1+C2)**																	
E.	**Unit COGS (D/A)**																	

		Total all products	Domestic market				Export market (Malaysia)				Export market (Other than Malaysia)				Total sales (Domestic market + Export market)			
			Sales during Year 1 / Year 2 / POI (Quarterly)				Sales during Year 1 / Year 2 / POI (Quarterly)				Sales during Year 1 / Year 2 / POI (Quarterly)				Sales during Year 1 / Year 2 / POI			
			Unrelated customers		Related customers		Unrelated customers		Related customers		Unrelated customers		Related customers		Unrelated customers		Related customers	
		Year 1, Quarter 1	Like product	Other products	Like product	Other products	Subject merchandise	Other products	Subject merchandise	Other products	Subject merchandise	Other products	Subject merchandise	Other products	Like product/ Subject merchandise	Other products	Like product/ Subject m merchandise	Other products
F.	**Selling, general and administrative costs (SG&A)**																	
	Selling/Advertising																	
	Financing																	
	Insurance																	
	Freight/Transport																	
	Packing																	
	Administration																	
	Research & Development																	
	Technical assistance																	
	Security																	
	Pollution control																	
	Others (specify)																	
G.	**Total cost to sell***																	
H.	**Unit cost to sell (G/A)**																	
I.	**Cost per unit (E+H)**																	
J.	**Operating Profit/(Loss)**																	
K.	**Profit Margin**																	

**Total Cost to Sell = Please list/indicate which item under SG&A is included*

5. Provide separate tables and computer files named "DOM-CTMS" and "MY-CTMS" showing cost to make and sell for each of the **like product and subject merchandise which was sold** in the **domestic market** and **export market** respectively for the **Year 1**, **Year 2** and **POI** in **quarterly basis**. Use the field names listed as per Table F-3.3 and Table F-3.4 as column headings. Provide details of how "Cost of Goods Sold" and "SG&A expenses" were allocated to each of the product (Identified by product sales code (PDT-CODE) as reported in Table D-3.2 and E-3.2. For this purpose, use Excel format as per Table F-3.3 and F-3.4.

RESPONSE:

Please refer to **Table F-3.3 (DOM-CTMS)** and **Table F-3.4 (MY-CTMS)**. Please note the following:

[***]

[Note: The above information in asterisk is provided in the Confidential Submission. A summary is not possible as they are confidential and proprietary business information of the Company. Any disclosure of the same may result in adverse business, operational and financial effect and/or leakage of the Company's business information].

Table F-3.3: Cost to Make and Sell by Grade (DOM-CTMS)

Field name	Field description	Explanation
SEQ-NO	Sequence number	Sequential number for each transaction, or line item (i.e., the first transaction is "1", the second is "2", and so on)
PDT-CODE	Product sales code	Product sales code as reported in Table D-3.2 for the **like product sold** during **Year 1, Year 2** and **POI** in your records
PDT-GRADE	Product grade	Product grade of the **like product sold** during **Year 1, Year 2** and **POI** in your records
QTY-SOLD	Quantity sold	Quantity sold for the **like product** during **Year 1, Year 2** and **POI** in your records (specify the unit of measurement used)
QTY-PROD	Quantity produced	Quantity produced for the **like product** during **Year 1, Year 2** and **POI** in your records (specify the unit of measurement used)
DIR-RM	Direct raw material	Raw material cost for the **like product sold** during **Year 1, Year 2** and **POI** in your records (specify currency used)
DIR-OM	Direct other material	Other direct raw material cost for the **like product sold** during **Year 1, Year 2** and **POI** in your records (specify currency used)

Field name	Field description	Explanation
DIR-LAB	Direct labour	Direct labour cost for the **like product sold** during **Year 1, Year 2** and **POI** in your records (specify currency used)
VAR-OH	Variable manufacturing overhead	Variable manufacturing overhead cost. If more than one type of variable manufacturing overhead costs, insert additional column of data at this point for the additional costs (specify the costs and currency used) for the **like product sold** during **Year 1, Year 2** and **POI** in your records. Do not aggregate the costs.
OTH-VAR	Others variable manufacturing costs	Other variable manufacturing costs (specify the costs and currency used) for the **like product sold** during **Year 1, Year 2** and **POI** in your records. Do not aggregate the cost.
TOT-VC	Total variable manufacturing costs	Sum of manufacturing costs for the **like product sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used) (DIR-RM + DIR-OM + DIR-LAB + VAR-OH + OTH-VAR)
IND-LAB	Indirect labour	Indirect labour costs for the **like product sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
FIX-OH	Fixed manufacturing overhead	Fixed manufacturing costs. If more than one type of fixed manufacturing overhead costs, insert additional column of data at this point for the additional costs (specify the costs and currency used) for the **like product sold** during **Year 1, Year 2** and **POI** in your records. Do not aggregate the cost.
OTH-FIX	Others fixed manufacturing costs	Other fixed manufacturing costs. If more than one type of fixed manufacturing costs, insert additional column of data at this point for the additional costs (specify the costs and currency used) for the **like product sold** during **Year 1, Year 2** and **POI** in your records. Do not aggregate the cost.
TOT-FC	Total fixed manufacturing costs	Sum of fixed manufacturing costs for the **like product sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used) (IND-LAB + FIX-OH + OTH-FIX)
OP-WIP	Opening work in progress	Opening work in progress costs for the **like product** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
CL-WIP	Closing work in progress	Closing work in progress costs for the **like product** during **Year 1, Year 2** and **POI** in your records. (specify currency used)

Field name	Field description	Explanation
TOT-WIP	Total work in progress	Sum of work in progress costs (OP-WIP minus CL-WIP) for the **like product** during **Year 1, Year 2** and **POI** in your records (specify currency used)
TOT-COGS	Total cost of goods sold	Sum of cost of goods sold (TOT-VC + TOT-FC) for the **like product sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
UNI-COGS	Unit cost of goods sold	Total cost of goods sold divided by quantity sold for the **like product sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used) (TOT-COGS / QTY-SAL)
SELL	Selling expenses	Selling/advertising expenses for the **like product sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
FIN	Financial expenses	Financial expenses for the **like product sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
FRE	Freight expenses	Freight expenses for the **like product sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
PAC	Packing expenses	Packing expenses for the **like product sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
ADM	Administrative expenses	Administrative expenses for the **like product sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
R&D	R&D expenses	Research and development expenses for the **like product sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
OTH-SGA	Other SG&A expenses	Other selling, general and administrative costs incurred. If more than one type of SG&A costs, insert additional column of data at this point for the additional costs (specify the costs and currency used) for the **like product sold** during **Year 1, Year 2** and **POI** in your records. Do not aggregate the costs.
TOT-SGA	Total SG&A expenses	Sum of SG&A expenses for the **like product sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used) (SELL + FIN + FRE + PAC + ADM + R&D + OTH-SGA)

Field name	Field description	Explanation
UNI-SGA	Unit SG&A	Total SG&A expenses divided by quantity sold for the **like product sold** during **Year 1, Year 2** and **POI** in your records**.** (specify currency used) (TOT-SGA / QTY-SAL)
UNI-COS	Cost per unit	Unit cost of goods sold plus unit SG&A for the **like product sold** during **Year 1, Year 2 and POI** in your records. (specify currency used) (UNI-COGS + UNI-SGA)

Table F-3.4: Cost to Make and Sell by Grade (MY-CTMS)

Field name	Field description	Explanation
SEQ-NO	Sequence number	Sequential number for each transaction, or line item (i.e., the first transaction is “1”, the second is “2”, and so on)
PDT-CODE	Product sales code	Product sales code as reported in Table E-3.2 for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records
PDT-GRADE	Product grade	Product grade of **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records
QTY-SOLD	Quantity sold	Quantity sold for the **subject merchandise** during **Year 1, Year 2** and **POI** in your records (specify the unit of measurement used)
QTY-PROD	Quantity produced	Quantity produced for the **subject merchandise** during **Year 1, Year 2** and **POI** in your records. (specify the unit of measurement used)
DIR-RM	Direct raw material	Raw material cost for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records (specify currency used)
DIR-OM	Direct other material	Other direct raw material cost for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records (specify currency used)
DIR-LAB	Direct labour	Direct labour cost for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records (specify currency used)

Field name	Field description	Explanation
VAR-OH	Variable manufacturing overhead	Variable manufacturing overhead cost. If more than one type of variable manufacturing overhead costs, insert additional column of data at this point for the additional costs (specify the costs and currency used) for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. Do not aggregate the costs.
OTH-VAR	Others variable manufacturing costs	Other variable manufacturing costs (specify the costs and currency used) for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. Do not aggregate the cost.
TOT-VC	Total variable manufacturing costs	Sum of manufacturing costs for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used) (DIR-RM + DIR-OM + DIR-LAB + VAR-OH + OTH-VAR)
IND-LAB	Indirect labour	Indirect labour costs for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records**.** (specify currency used)
FIX-OH	Fixed manufacturing overhead	Fixed manufacturing costs. If more than one type of fixed manufacturing overhead costs, insert additional column of data at this point for the additional costs (specify the costs and currency used) for the **subject merchandise sold** during **Year 1, Year 2 and POI** in your records. Do not aggregate the cost.
OTH-FIX	Others fixed manufacturing costs	Other fixed manufacturing costs. If more than one type of fixed manufacturing costs, insert additional column of data at this point for the additional costs (specify the costs and currency used) for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. Do not aggregate the cost.
TOT-FC	Total fixed manufacturing costs	Sum of fixed manufacturing costs for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used) (IND-LAB + FIX-OH + OTH-FIX)
OP-WIP	Opening work in progress	Opening work in progress costs for the **subject merchandise** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
CL-WIP	Closing work in progress	Closing work in progress costs for the **subject merchandise** during **Year 1, Year 2** and **POI** in your records. (specify currency used)

Field name	Field description	Explanation
TOT-WIP	Total work in progress	Sum of work in progress costs (OP-WIP minus CL-WIP) for the **subject merchandise** during **Year 1, Year 2** and **POI** in your records (specify currency used)
TOT-COGS	Total cost of goods sold	Sum of cost of goods sold (TOT-VC + TOT-FC) for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
UNI-COGS	Unit cost of goods sold	Total cost of goods sold divided by quantity sold for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used) (TOT-COGS / QTY-SAL)
SELL	Selling expenses	Selling/advertising expenses for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
FIN	Financial expenses	Financial expenses for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
FRE	Freight expenses	Freight expenses for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
PAC	Packing expenses	Packing expenses for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
ADM	Administrative expenses	Administrative expenses for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
R&D	R&D expenses	Research and development expenses for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)
OTH-SGA	Other SG&A expenses	Other selling, general and administrative costs incurred. If more than one type of SG&A costs, insert additional column of data at this point for the additional costs (specify the costs and currency used) for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. Do not aggregate the costs.
TOT-SGA	Total SG&A expenses	Sum of SG&A expenses for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)

Field name	Field description	Explanation
		(SELL + FIN + FRE + PAC + ADM + R&D + OTH-SGA)
UNI-SGA	Unit SG&A	Total SG&A expenses divided by quantity sold for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used) (TOT-SGA / QTY-SAL)
UNI-COS	Cost per unit	Unit cost of goods sold plus unit SG&A for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used) (UNI-COGS + UNI-SGA)