AD/IMP/2026/01

QUESTIONNAIRE FOR IMPORTERS ON THE PETITION OF ANTI-DUMPING DUTIES INVESTIGATION

Importer(s) 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 "C*onfidential*" 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 Importer's declaration is to be completed.

IMPORTER:
SERENDAH STEEL TRADING SDN BHD

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

IMPORTER	: **SERENDAH STEEL TRADING SDN BHD**
SUBJECT MERCHANDISE	: **FLAT ROLLED PRODUCT OF OTHER ALLOY STEEL, PLATED OR COATED WITH ALUMINIUM AND ZINC**
H.S. CODES / AHTN	: **7225.92.90 00, 7225.99.90 00, 7226.99.19 00 and 7226.99.99 00.**

Note: The H.S. Code and AHTN are given only for information and have no binding effect on the classification of the subject merchandise.

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

MINISTRY OF INVESTMENT, TRADE AND INDUSTRY MALAYSIA

DECLARATION

IMPORTER'S SUBMISSION IN RELATION TO A PETITION FOR ANTI-DUMPING DUTIES INVESTIGATION

I hereby declare that SERENDAH STEEL TRADING SDN BHD (company) does import 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 under 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 : _____

Name : LIEW MENG FEI

Designation : DIRECTOR

Date : 28/08/2026



SECTION A: COMPANY STRUCTURE AND OPERATIONS

A-1 Contact Information

Company

Name: SERENDAH STEEL TRADING SDN BHD

Address: LOT 2089, JALAN KL-IPOH, TAMAN SERENDAH INDAH, 48200 SERENDAH, SELANGOR

Telephone: 03-6081 2188

Email: serendahsteel@gmail.com

Web page: http://www.serendahsteel.com

Factory

Name: SERENDAH STEEL TRADING SDN BHD

Address: : LOT 2089, JALAN KL-IPOH, TAMAN SERENDAH INDAH, 48200 SERENDAH, SELANGOR

Telephone: 03-6081 2188

Email: serendahsteel@gmail.com

Contact person

Name: LIEW MENG FEI

Position/Designation: DIRECTOR

Address: LOT 2089, JALAN KL-IPOH, TAMAN SERENDAH INDAH, 48200 SERENDAH, SELANGOR

Telephone: 016-311 9985

Email: serendahsteel@gmail.com

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	: N/A
Name of legal representative/consultant	:
Name of contact person	:
Address	:

Telephone	:
Email	:

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.

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
LIEW MENG FEI	DIRECTOR	20%
SIN KAI LIN	DIRECTOR	20%
SIN CHIN CHOON	SHAREHOLDER	20%
SIN BOON MENG	SHAREHOLDER	20%
SIN BOON KEONG	SHAREHOLDER	20%

3. Please provide:

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

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

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

   d. Copies of legal documents (e.g., memorandum of association, article of association, business registration, manufacturing license, return for allotment of shares, declaration of entitlement to shares/debentures, notification of change in the register of directors, managers and secretaries and etc.)

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

   f. Please indicate Tax Identification Number (TIN) and SST 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).

SECTION A-3: CORPORATE INFORMATION

SERENDAH STEEL TRADING SDN BHD

Question 1: Company Name and Business Organisation

Our company's registered name is SERENDAH STEEL TRADING SDN BHD. It is a Private Limited Company (Sdn. Bhd.) incorporated in Malaysia under the Companies Act 2016.

We do not trade under any other name besides our registered name.

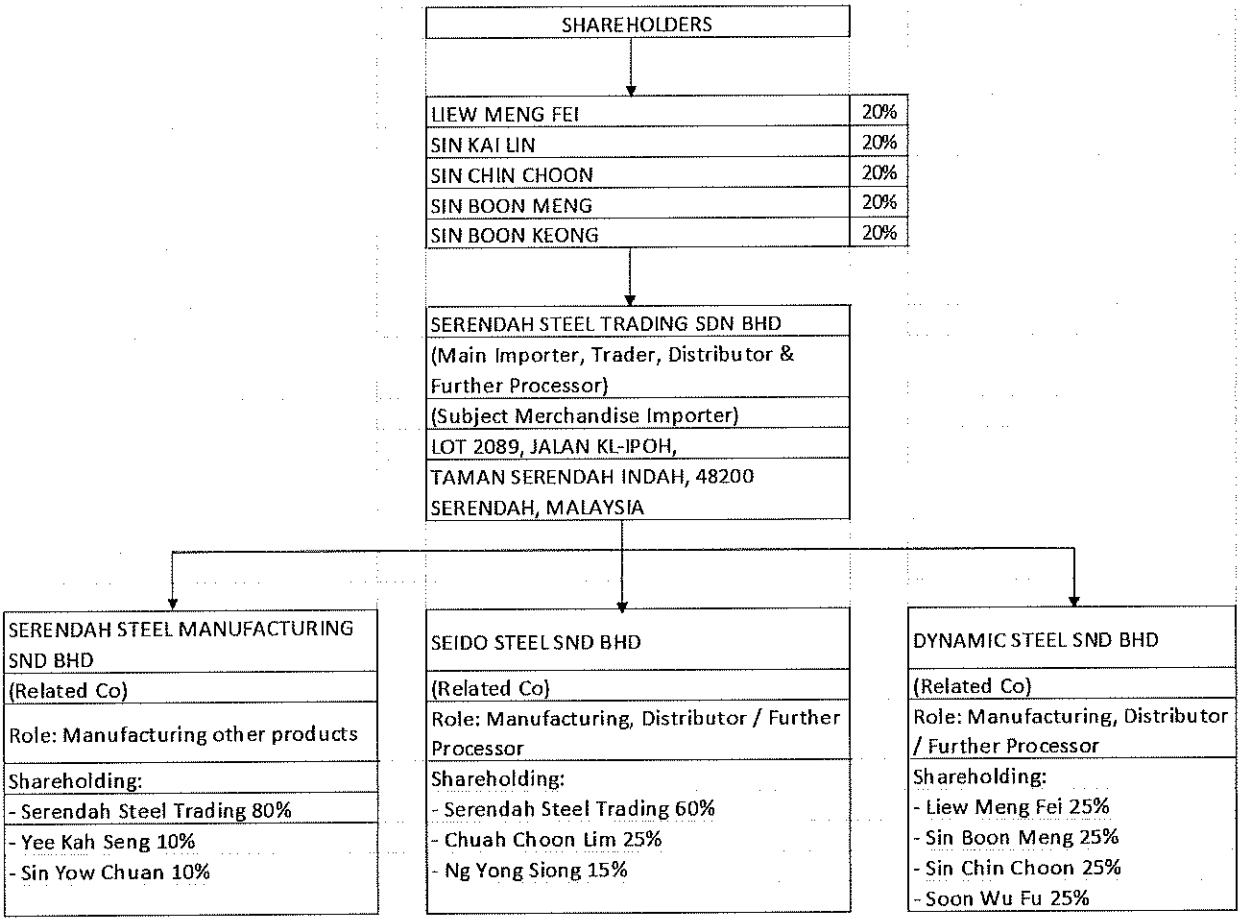
Question 2: Principal Shareholders and Activities

Table A-3.1: Shareholdings

Name of shareholder	Activity of shareholder	Percentage of shareholding
LIEW MENG FEI	Director	20%
SIN KAI LIN	Director	20%
SIN CHIN CHOON	Shareholder	20%
SIN BOON MENG	Shareholder	20%
SIN BOON KEONG	Shareholder	20%
	TOTAL	100%

Question 3: Corporate Diagrams and Documents

3a. Corporate Hierarchy / Global Structure

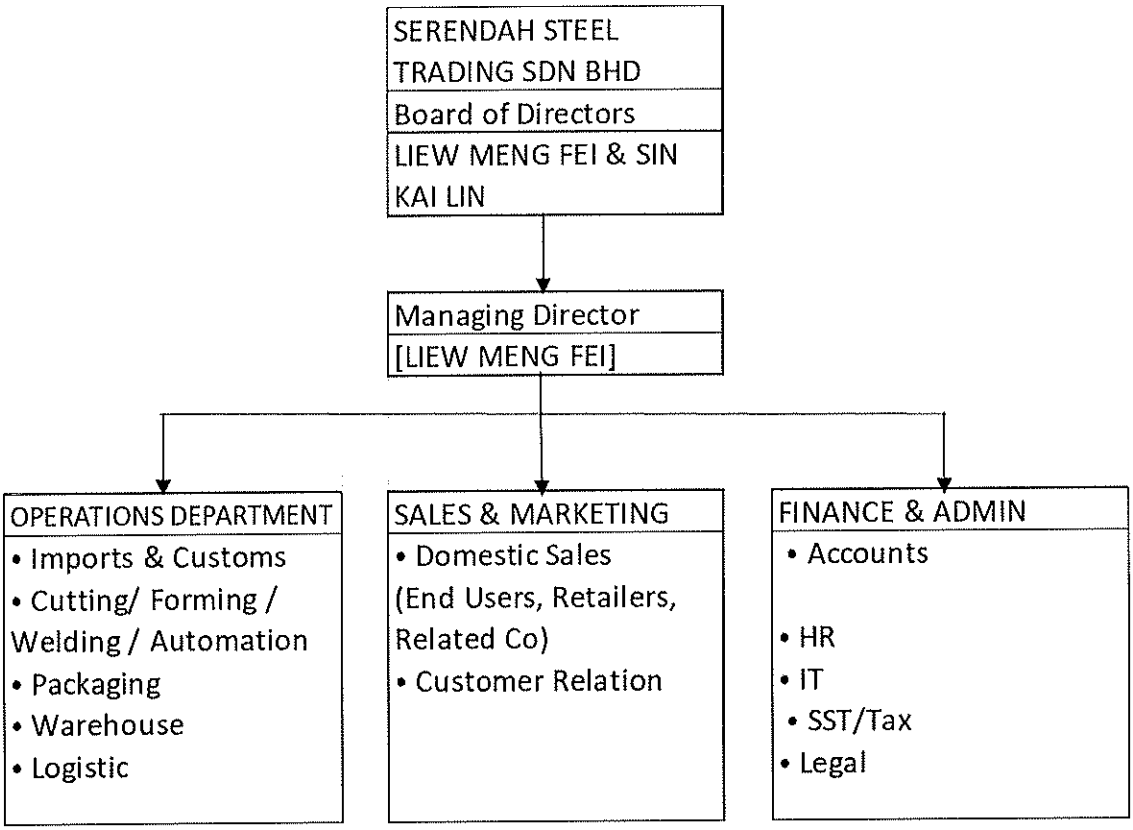


Note on Related Companies:

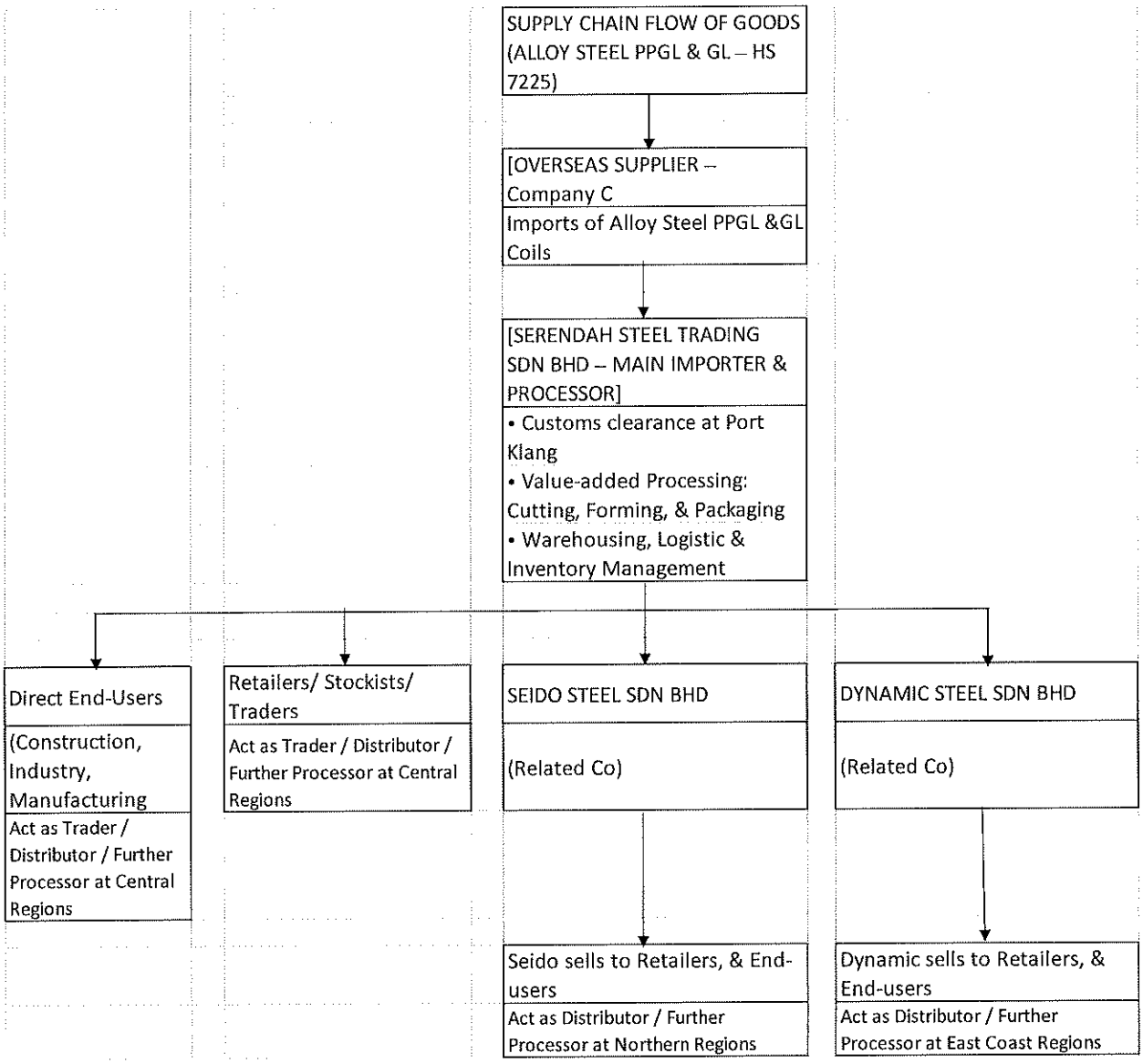
· Serendah Steel Manufacturing Sdn Bhd: An upstream related company involved in manufacturing and processing of other products.

· Seido Steel Sdn Bhd & Dynamic Steel Sdn Bhd: Both are downstream related customers. They purchase processed alloy steel PPGL & GL (HS 7225) from Serendah Steel Trading Sdn Bhd and act as Distributors and Further Processors (further value added) for specific regions.

3b. Internal Departmental Reporting Lines (Serendah Steel Trading Sdn Bhd)



3c. Supply Chain Flow of Goods



Serendah Steel Trading Sdn. Bhd., act as a trader, distributor and further processor (full value added) for the imported alloy steel PPGL & GL. Serendah Steel Trading having Three main core products currently producing in the Factory. To gear up plant utilization and efficiency, Serendah Steel Trading has installed fully automated Pipe Mill in middle of 2025.

3d, 3e, 3f: Supporting Documents Checklist

Requirement Status Action Required

3d. Legal Documents - To Attach copies of: Memorandum & Articles of Association, Business Registration (SSM), Manufacturing/Import License, Share Allotment Returns, Directors/Secretaries change notifications.

3e. Brochures/Pamphlets - To Attach product catalogues or business introduction pamphlets.

3f. TIN, SST & TPD - To Attach Tax Identification Number (TIN): [C 20955704040] SST Registration Number: NA "Our company does not maintain formal Transfer Pricing Documentation as we do not engage in cross-border related party transactions that trigger mandatory TPD requirements under Section 140A of the Income Tax Act 1967. All related party transactions are conducted at arm's length."

Question 4: Related Companies

Table A-3.2: Listing of Related Companies

We confirm that none of our related companies are involved in the manufacturing, supply of input, or importation of the "Like Product" as defined on this investigation (i.e., non-alloy steel produced by the domestic industry).

- Serendah Steel Manufacturing Sdn Bhd does not manufacture non-alloy steel;
- Seido Steel Sdn Bhd and Dynamic Sdn Bhd act solely as distributor / further processor of the Subject Merchandise (alloy steel PPGL & GL, HS 7225) purchased from Serendah Steel Trading Sdn Bhd, and they do not deal with the Like Product for similar product.

Company	Deals with Subject Merchandise (Alloy Steel)?	Deals with Like Product (Non-Alloy)?	Ticks Required?
Serendah Steel Trading (We)	Yes	No	N/A (We are the respondent)
Serendah Steel Manufacturing	No	No	None
Seido Steel	Yes (Value Added)	No	None
Dynamic Steel	Yes (Value Added)	No	None

Concept	Definition	Does Your Company/Related Companies Do This?
Subject Merchandise	The product under investigation: Alloy Steel GL (HS 7225) imported from China/Taiwan/Vietnam.	YES. We import and process this.
Like Product	The product made by the Malaysian domestic industry (Blue Scope): Non-Alloy Steel (HS 7210/7212).	NO. Neither you nor your related companies produce, supply inputs for, or import this non-alloy steel for similar end product.

Name, address, email and telephone of related company in all countries	List of activities	Tick if manufacturer of the like product	Tick if supplier of input used in the manufacturing of the like product	Tick if importer of the like product	Percentage of your company's shareholding in related company	Percentage of related company's shareholding in your company
Serendah Steel Manufacturing Sdn Bhd [Same address] [serendahsteel@gmail.com]	Manufacturing & processing of steel products				80%	0%
Seido Steel Sdn Bhd [4170 Jaian Bukit Tambun Juru, Estate Juru, 14100 Bukit Mertajam, Pulau pinang] [seidosteel@gmail.com]	Distributor, and Further Processor (further value added). Purchases alloy steel PPGL & GL (HS 7225) from Serendah Steel Trading Sdn Bhd for onward sale to retailers, and end-users. Perform additional processing (cutting/forming/Packing/delivery services) on the purchased products at Northern Regions				60%	0%
Dynamic Steel Sdn Bhd [D5, Lot PT 59872, Jalan IM 14/9. Kawasan Perindustrian, Sektor 3, Banadar indera Mahkota, 25200 Kuatan, Pahang] [09-5729999]	Distributor, and Further Processor (further value added). Purchases alloy steel PPGL & GL (HS 7225) from Serendah Steel Trading Sdn Bhd for onward sale to retailers, and end-users. Perform additional processing (cutting/forming/Packing/delivery services) on the purchased products at East Coast Regions				0%	0%

Notes on Related Companies:

1. Seido Steel Sdn Bhd: Serendah Steel Trading Sdn Bhd holds 60% of Seido, making it a subsidiary. Seido purchases 7225 alloy steel coils from Serendah Steel and act as a Distributor / Further Processor (further value added) for Northern Region.

2. Dynamic Steel Sdn Bhd: Although Serendah Steel Trading does not directly hold shares in Dynamic, it is a related company under Section 2(5) of Act 504 because its shareholders (Liew Meng Fei, Sin Boon Meng, Sin Chin Choon, Soon Wu Fu) are common shareholders/directors who control both Serendah Steel Trading and Dynamic Steel. Dynamic also purchases 7225 alloy steel from Serendah Steel and act as a Distributor / Further Processor (further value added) in East Coast Region.

Question 5: Contractual Links / Agreements

We confirm that our company has no contractual links or agreements (such as licensing, technical patents, or compensatory agreements) with other companies in Malaysia or abroad, aside from standard commercial purchase orders issued to our overseas suppliers.

We do not have any subcontracting or exclusive supply agreements with Seido Steel Sdn Bhd or Dynamic Steel Sdn Bhd. Transactions with them are conducted on a standard commercial basis.

Question 6: Other Commercial Relationships with Alleged Countries

Our relationship with entities in the alleged countries (China, Taiwan, Vietnam) is strictly limited to arm's length commercial purchases of alloy steel GL. We do not have any production facilities, joint ventures, or exclusive commercial arrangements in these countries.

Quick Reference: Shareholding Summary

Company	Shareholders	% Holding
Serendah Steel Trading Sdn Bhd	Liew Meng Fei, Sin Kai Lin, Sin Chin Choon, Sin Boon Meng, Sin Boon Keong	20% each (100% total)
Serendah Steel Manufacturing Sdn Bhd	Serendah Steel Trading Sdn Bhd, Yee Kah Seng, Sin Yew Chuan	80%, 10%, 10%
Seido Steel Sdn Bhd	Serendah Steel Trading Sdn Bhd, Chuah Choon Lim, Ng Yong Siong	60%, 25%, 15%
Dynamic Steel Sdn Bhd	Liew Meng Fei, Sin Boon Meng, Sin Chin Choon, Soon Wu Fu	25% each (100% total)

Contact Details

Item	Detail
Company Name	SERENDAH STEEL TRADING SDN BHD
Address	LOT 2089, JALAN KL-IPOH, TAMAN SERENDAH INDAH, 48200 SERENDAH, SELANGOR
Telephone	03-6081 2188
Email	serendahsteel@gmail.com
Website	http://www.serendahsteel.com
Contact Person	LIEW MENG FEI (Director)
Contact Phone	016-311 9985

Key Update Summary

Aspect	Summarise
Seido & Dynamic Role	Active Distributors, and Further Processors (Further valued added entity)
Relationship	Downstream Customers purchasing HS 7225 from Serendah Steel Trading
Supply Chain	Clearly shows flow: Overseas Supplier --->Serendah Steel Trading ---> Seido/Dynamic ---> End-users/Retailers
Table A-3.2	Specific trading/processing activities stated

SECTION B: PURCHASE OF THE SUBJECT MERCHANDISE

B-1: PURCHASE OF THE SUBJECT MERCHANDISE

1. Detailed Description of Purchase Process

Our company purchases the subject merchandise (Pre-painted GL (PPGL) and GL alloy steel Galvanized Steel under HS Code 7225) from suppliers located in the subject countries (China). To ensure we are importing the Alloy product under the right classification, we obtained "Document A (Confidential)" (kindly find both sample documents as attached). All purchases are made through unrelated companies (arm's length transactions). We do not have any related-party supplier relationships for the subject merchandise.

The purchase process follows the standard international import procurement procedure, which can be divided into the following sequential stages:

Stage 1: Sourcing and Price Negotiation

We identify potential suppliers through market research, trade fairs, and existing business relationships, then we maintain the purchase quality through identified reliable supplier, we initiate price negotiations covering:

· Product specifications (grade, thickness, width, coating weight, Color)

· Unit price (FOB or CIF terms)

· Payment terms (typically Letter of Credit or Telegraphic Transfer)

· Delivery schedule

Upon reaching an agreement, we issue a Purchase Contract (PC) to the supplier. The PC contains all agreed terms and conditions.

Average timeframe: 3–7 days

Stage 2: Order Confirmation and Proforma Invoice

The supplier reviews the PO and issues a Proforma Invoice (PI) confirming:

· Product specifications

· Quantity

· Unit price and total value

· Delivery terms (Incoterms)

· Payment terms

· Estimated shipment date

We review the PI against the PO. If there are discrepancies, we request amendments. Once confirmed, the PI serves as the basis for payment and shipment arrangements.

Average timeframe: 2–5 days

Stage 3: Payment Arrangement

Depending on the agreed payment terms, we arrange payment as follows:

· Letter of Credit (L/C): We instruct our bank to issue an L/C in favour of the supplier. The L/C is transmitted to the supplier's bank.

· Telegraphic Transfer (T/T): We make an advance payment (typically 10%) upon PI confirmation, with the balance paid against shipping documents.

Average timeframe: 3–10 days (L/C) / 1–2 days (T/T)

Stage 4: Production and Shipment

Upon receiving the L/C or advance payment, the supplier commences production. The supplier:

· Manufactures the product according to specifications

· Conducts quality control inspections

· Arranges packing and labelling

· Books shipping space with a freight forwarder

· Loads the container(s) onto the vessel

The supplier issues a Bill of Lading (B/L) and other shipping documents (Commercial Invoice, Packing List, Certificate of Origin, etc.) upon loading.

Average timeframe: 15–30 days (production) + 10 - 15 days (shipment to Malaysia)

Stage 5: Customs Clearance and Delivery

Upon arrival at Port Klang, we engage a licensed Customs Agent to:

· Lodge import declaration via the Customs Information System (SMK)

· Pay import duties and taxes (if applicable)

· Arrange for physical inspection (if required by Customs)

· Obtain customs release

Once customs clearance is completed, the goods are transported by truck to our factory or warehouse.

Average timeframe: 3–7 days (customs clearance) + 1–3 days (delivery)

Stage 6: Receipt and Invoice Verification

Upon delivery to our factory/warehouse, we:

· Physically inspect the goods for quantity and visible damage

· Cross-check the goods against the PO and shipping documents

· Verify the supplier's Commercial Invoice against the PO and actual receipt

· Update our inventory system

If any discrepancies are found, we raise a claim with the supplier or shipping line.

Average timeframe: 1–3 days

Stage 7: Final Payment

After verification and acceptance of the goods, we arrange final payment:

· L/C: Our bank releases payment to the supplier upon presentation of compliant shipping documents

· T/T: We remit the balance payment (if any) to the supplier

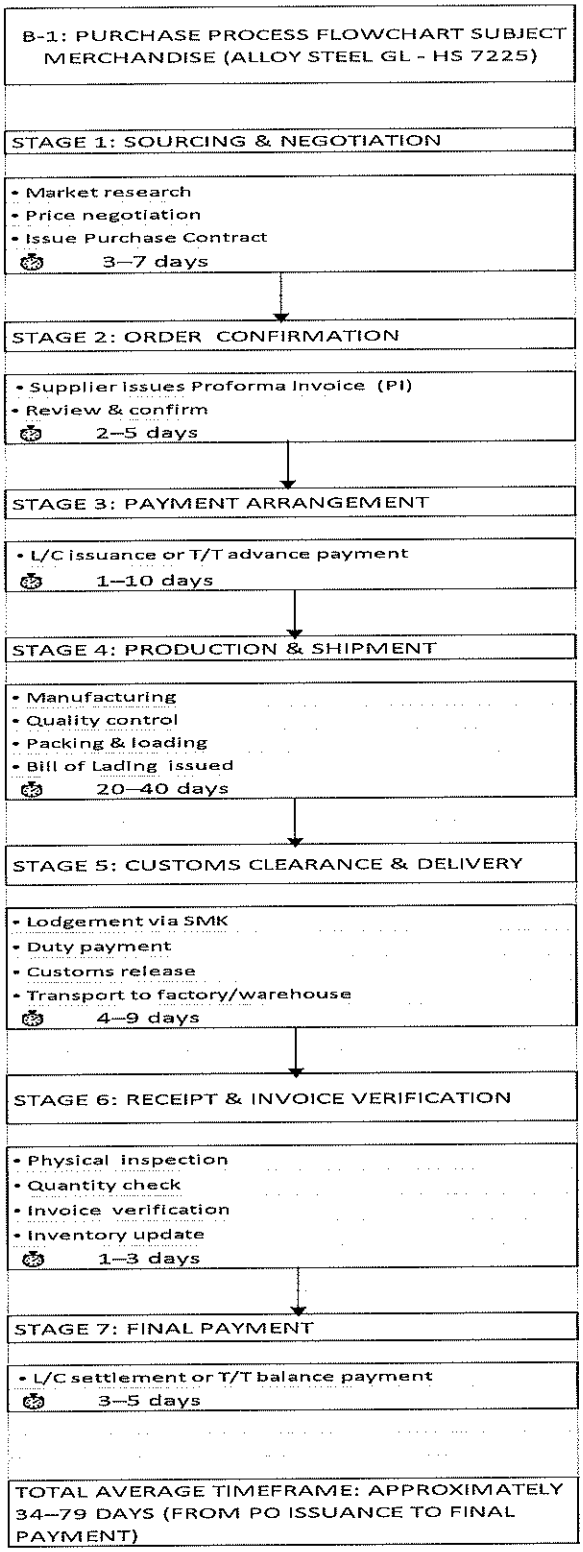
Average timeframe: 3–5 days

Distinction Between Related and Unrelated Companies

All our purchases of the subject merchandise are from unrelated companies. We do not have any related-party suppliers for the subject merchandise. Therefore, there is no differentiation in our purchase process for related vs. unrelated companies.

Chronological Flowchart

Below is a chronological flowchart illustrating every step in the purchase process, with average timeframes indicated.


B-1: PURCHASE PROCESS FLOWCHART SUBJECT MERCHANDISE (ALLOY STEEL GL - HS 7225)
STAGE 1: SOURCING & NEGOTIATION
• Market research
• Price negotiation
• Issue Purchase Contract
3—7 days
STAGE 2: ORDER CONFIRMATION
• Supplier issues Proforma Invoice (PI)
• Review & confirm
2—5 days
STAGE 3: PAYMENT ARRANGEMENT
• L/C issuance or T/T advance payment
1—10 days
STAGE 4: PRODUCTION & SHIPMENT
• Manufacturing
• Quality control
• Packing & loading
• Bill of Lading issued
20—40 days
STAGE 5: CUSTOMS CLEARANCE & DELIVERY
• Lodgement via SMK
• Duty payment
• Customs release
• Transport to factory/warehouse
4—9 days
STAGE 6: RECEIPT & INVOICE VERIFICATION
• Physical inspection
• Quantity check
• Invoice verification
• Inventory update
1—3 days
STAGE 7: FINAL PAYMENT
• L/C settlement or T/T balance payment
3—5 days
TOTAL AVERAGE TIMEFRAME: APPROXIMATELY 34—79 DAYS (FROM PO ISSUANCE TO FINAL PAYMENT)

Invoicing Process

The invoicing process involves the following documents at each stage:

Stage	Document	Issued By	Purpose
Order placement	Purchase Contract	Our company	Formal order to supplier
Order confirmation	Proforma Invoice (PI)	Supplier	Confirms price, quantity, terms
Shipment	Commercial Invoice	Supplier	Final invoice for customs and payment
Shipment	Packing List	Supplier	Detail of packing for customs
Shipment	Bill of Landing (B/L)	Shipping Line	Title document / proof of shipment
Customs clearance	Customs Declaration (Form 1 / Form 2)	Customs Agent	Lodgement with Malaysian Customs
Final settlement	Payment advice	Our Bank	Proof of payment to supplier

All invoices are recorded in our accounting system upon receipt and verified against the PO and physical receipt of goods before payment is released.

2.0 Overview

We respectfully submit that there are material and fundamental differences between our subject merchandise and any product that could be considered a "like product" in Malaysia. In fact, no like product exists in Malaysia for our subject merchandise because the Malaysian domestic industry does not manufacture the product we import.

2.1 Our Subject Merchandise — PPGL & GL Alloy Steel GL (HS 7225)

The subject merchandise we import is Galvanized Steel (GL) made from an alloy steel base, classified under HS Code 7225 (refer Attachment B)

Under the Harmonised System (HS) Chapter 72, steel is classified as alloy steel if its base chemistry contains specific alloying elements in defined proportions:

Element Minimum %	Required to be "Alloy Steel"
Chromium	0.3% or more
Boron	0.0008% or more
Manganese	1.65% or more
Silicon	0.6% or more
Molybdenum	0.08% or more
Nickel	0.3% or more

Our imported products contain these alloying elements, which give our products specific physical, technical, and chemical characteristics required by our downstream customers.

2.3 The Malaysian Domestic Industry Produces Non-Alloy Steel — NOT Alloy Steel

The domestic producer that filed this petition is NS Bluescope Malaysia Sdn. Bhd.

Based on publicly available information:

· NS Bluescope's product portfolio consists of COLORBOND®, ZINCALUME®, and TRUECORE® — all using low-carbon steel as the base material.

· NS Bluescope's production process intentionally uses low-carbon steel to achieve required structural properties without alloy additions.

· In the 2020 anti-dumping investigation, NS Bluescope's petition explicitly covered non-alloy steel products under HS codes 7210 and 7212 — not HS 7225.

This confirms that NS Bluescope produces non-alloy steel (carbon steel), not the alloy steel that we import.

2.4 Comparison Table: Subject Merchandise vs. NS Bluescope's Products

Aspect	Our Subject Merchandise (Imported PPGL)	NS Bluescope's Products (Domestic)
Base Material	Alloy steel (contains Cr, Mn, B, etc.)	Non-alloy Steel (carbon steel)
HS Code	7225	7210 / 7212
Alloying Elements	Chromium, Boron, manganese, etc.	None (low-carbon steel)
Physical Characteristics	Different strength, hardness, ductility	Different strength, hardness, ductility
Chemical Composition	Contains alloying elements	Does not contain alloying elements
Coating	Pre-painted with Zinc/Aluminium	Zinc/Aluminium
Applications	Specific downstream requiring alloy properties	General building and construction uses

2.5 Material Differences Between Subject Merchandise and Like Product

The material differences between our subject merchandise and NS Bluescope's products are as follows:

Difference	Subject Merchandise (Our Imports)	Like Product (Blue Scope)	Material Difference?
Base Steel Chemistry	Alloy steel (contains Cr, Mn, B)	Non-alloy steel (carbon steel)	Yes - Fundamental chemical difference
Alloying Elements	Present	Absent	Yes - Definitive chemical difference
Physical Properties	Different due to alloying	Different due to lack of alloying	Yes - Different strength, hardness, ductility
HS Classification	HS 7225	HS 7210 / 7212	Yes - Different HS codes
Coating	Zinc/Aluminium	Zinc/Aluminium	No - Same coating

2.6 Why These Differences Are Material

The differences in base steel chemistry are not superficial — they are fundamental and material for the following reasons:

1. HS Classification is Based on Base Material, Not Coating

· Under the Harmonised System, the classification of flat-rolled steel products is determined by the base steel chemistry, not the coating.

· Products with a non-alloy steel base fall under HS 7210/7212.

· Products with an alloy steel base fall under HS 7225.

· This is a clear and definitive distinction recognized internationally.

2. Physical, Technical, and Chemical Characteristics Are Different

· Alloy steel and non-alloy steel have different physical properties (strength, hardness, ductility, weldability, corrosion resistance).

· These differences are determined by the presence or absence of alloying elements.

· Our downstream customers require specific alloy steel properties that non-alloy steel cannot provide.

3. Applications Are Different

· Alloy steel GL is used in applications requiring higher strength, better formability, or specific corrosion resistance.

· Non-alloy steel GL is used in general building and construction applications.

· These products are not interchangeable for many downstream uses.

4. WTO "Like Product" Disciplines Require Narrow Interpretation

· Under WTO Agreement on Anti-Dumping disciplines, the "like product" determination must be interpreted narrowly.

· The EU approach — which Malaysia's Act is modelled upon — gives primacy to physical, technical, and chemical characteristics.

· Since the base chemistry is fundamentally different, these products are not like products.

2.7 Conclusion on Differences

We respectfully submit that:

1. Our subject merchandise is alloy steel (HS 7225) — containing specific alloying elements that define its physical, technical, and chemical characteristics.

2. NS Bluescope's products are non-alloy steel (HS 7210/7212) — using low-carbon steel without alloying elements.

3. Despite sharing the same zinc/aluminium coating, the products are fundamentally different in their base material chemistry, physical properties, and applications.

4. These are material differences — not superficial or cosmetic — that define the products as distinct under the HS system and under WTO "like product" disciplines.

5. No "like product" exists in Malaysia for our subject merchandise, as the domestic industry does not produce alloy steel GL.

2.8 Supporting Evidence

We rely on the following evidence to support our submission:

Evidence	Source
HS Chapter 72 classification rules	World Customs Organization (WCO) Harmonised System
NS Bluescope's product portfolio (non-alloy steel)	NS BlueScope Malaysia website / public information
NS Bluescope's 2020 petition (covered HS 7210/7212 only)	MITI 2020 anti-dumping investigation
WTO Agreement on Anti-Dumping - "like product" definition	WTO Legal Texts
Countervailing and Anti-Dumping Duties Act 1993 (Section 4)	Malaysia's domestic legislation

2.9 Summary

Question	Answer
Are there differences between subject merchandise and like product?	Yes - material and fundamental differences
What are the differences?	Base steel chemistry (alloy vs. non-alloy), physical properties, HS classification
Are these differences material?	Yes - they define the product and its applications
Does a "like product" exist in Malaysia?	No – NS Bluescope produces non-alloy steel, not alloy steel
What is the implication?	NS Bluescope cannot claim injury from imports of a product they do not produce

3 – Table B-1.1

Table B-1.1: Purchases of the Subject Merchandise for Year 1, Year 2 and POI

Country	Year 1														
	Quarter 1			Quarter 2			Quarter 3			Quarter 4			Total		
	Quantity	Value	Total purchase (%)	Quantity	Value	Total purchase (%)	Quantity	Value	Total purchase (%)	Quantity	Value	Total purchase (%)	Quantity	Value	Total purchase (%)
CHINA	100	100.00	x%	95	98	x%	89	84.00	x%	169	162.00	x%	xxx	xxxxx	xxxxx
Country Y															
Total	100	100.00	x%	95	98	x%	89	84.00	x%	169	162.00	x%	xxx	xxxxx	xxxxx

Country	Year 2														
	Quarter 1			Quarter 2			Quarter 3			Quarter 4			Total		
	Quantity	Value	Total purchase (%)	Quantity	Value	Total purchase (%)	Quantity	Value	Total purchase (%)	Quantity	Value	Total purchase (%)	Quantity	Value	Total purchase (%)
CHINA	100	100.00	x%	61	61.00	x%	117	103.00	x%	98	88.00	x%	xxx	xxxx	xxxxx
Country Y															
Total	100	100.00	x%	61	61.00	x%	117	103.00	x%	98	88.00	x%	xxx	xxxx	xxxxx

Country	POI														
	Quarter 1			Quarter 2			Quarter 3			Quarter 4			Total		
	Quantity	Value	Total purchase (%)	Quantity	Value	Total purchase (%)	Quantity	Value	Total purchase (%)	Quantity	Value	Total purchase (%)	Quantity	Value	Total purchase (%)
CHINA	100	100.00	x%	126	115.00	x%	202	183.00	x%	41	34.00	x%	xxx	xxxx	xxxxx
Country Y															
Total	100	100.00	x%	126	115.00	x%	202	183.00	x%	41	34.00	x%	xxx	xxxx	xxxxx

"During Year 1, our company purchased approximately 1350MT of alloy steel GL from China, value at approximately RM 5.3 million. This represents approximately 20% of oue total purchases, Full quarterly details are in the Confidential Version."

4 – Table B-1.2 (Refer Excel Table B-1.2 Confidential)

"All purchase transactions are conducted on an arm's length basis with overseas suppliers. Detailed transaction listing are provided in the Confidential Version."

B-2 Relationship with Exporter

1— Reimbursement/Compensation/Benefit None

— We confirm that there are no reimbursements, compensations, or benefits given by the exporter (**Company C**) or any associate of the exporter in respect of the whole or any part of the price of the subject merchandise.

All transactions are conducted on an arm's length basis. The purchase price paid is the actual invoice price, and no additional payments, reimbursements, or benefits have been received or agreed upon, whether directly or indirectly.

We do not have any arrangement for rebates, discounts, commissions, or any other form of compensation that would reduce the purchase price below the invoice value.

2 — Nature of Relationship No relationship

— Our company has no commercial or other relationship with the exporter, Company C, that would render them related parties under Section 2(5) of the Countervailing and Anti-Dumping Duties Act 1993.

Details of Relationship:

Aspect	Detail
Shareholding	No common shareholders or cross-shareholdings exist
Directors/Officers	No common directors, officers, or employees
Control	Neither party controls or is controlled by the other, directly or indirectly
Affiliation	No affiliation by blood, marriage, or commercial arrangement
Business Relationship	Standard buyer-seller relationship only
Other	No exclusivity agreements or special arrangements

Determination Under Section 2(5) of Act 504

3 — Effects of Relationship on Price No effects —

Question 3: Indicate the effects of this relationship on the price of the goods (e.g., Discount/Rebate/Commission etc.).

As stated in our response to Question 2, our company has no commercial or other relationship with the exporter, **Company C**, that would render them related parties under Section 2(5) of the Countervailing and Anti-Dumping Duties Act 1993.

Since no relationship exists, there are no effects on the price of the goods arising from any relationship. All transactions are conducted on an arm's length basis, and the prices are determined purely by market forces, negotiation, and standard commercial terms.

Specifically:

Aspect	Detail
Discounts	No special discounts are given beyond normal commercial discounts available to all customers
Rebates	No rebates are received
Commissions	No commissions are paid or received
Price Adjustments	No price adjustments are made outside normal commercial practice
Special Terms	No special payment or delivery terms exist

4 — Written Agreement No written agreement exists beyond standard commercial documents (PC, PI, Invoice, B/L, Packing List)

We confirm that there is no written agreement between our company and the exporter, **Company C**, beyond the standard commercial documents that accompany each individual transaction.

Documents Available:

Document	Detail
Purchase Contract (PC)	Issued for each transaction individually - no master agreement exists
Proforma Invoice (PI)	Issued by the exporter for each transaction
Commercial Invoice	Issued by the exporter for each shipment
Bill of Lading (B/L)	Issued by the shipping line for each shipment
Packing List	Issued by the exporter for each shipment

No Long-Term Agreement:

We do not have a long-term supply agreement, exclusivity agreement, distribution agreement, joint venture agreement, or any other form of written agreement with the exporter. Each transaction is conducted on a purchase order basis independently.

Attachment:

We attach a sample Purchase Order and sample Proforma Invoice for your reference. These are the standard documents used for each transaction. No other written agreement exists.

5 — Effects of Written Agreement on Price No effects

— As stated in our response to Question 4, there is no written agreement between our company and the exporter beyond the standard commercial documents for each individual transaction.

Since no written agreement exists, there are no effects on the price paid arising from any written agreement.

Effects:

Aspect	Effect
Discounts	None no agreement-based discounts
Rebates	None no agreement-based rebates
Commissions	None no agreement-based commissions
Price Adjustments	None prices are negotiated per transaction
Special Terms	None standard commercial terms only

The price paid for each transaction is determined solely by:

1. Market price at the time of negotiation;
2. Quantity ordered;
3. Product specifications;
4. Delivery terms (Incoterms);
5. Payment terms (standard L/C or T/T).

We confirm that there is no written agreement affecting the price paid, and therefore, there is no effect on the price.

Enclosures:

- Sample Purchase Contract (for reference) – refer to attachment in the confidential version
- Sample Proforma Invoice (for reference) – refer to attachment in the confidential version
- Mill Certificate (Attachment B for reference) – refer to attachment in the confidential version
- Sample "Document A" – refer to attachment in the confidential version

SECTION C: PURCHASE OF THE LIKE PRODUCT

SECTION C: PURCHASE OF THE LIKE PRODUCT

C-2 Comparison of Purchased of the Like Product and Subject Merchandise

1. Indicate all types/grades of the like product and subject merchandise purchased by your company during Year 1, Year 2 and POI in Table C-2.1.

1. Introduction

We have entered "0" (zero) for the quantity of like product purchased in Table C-2.1 for all periods. This written explanation sets out the reasons for our entry.

2. Legal Definition of "Like Product" Under Malaysian Law

Under Malaysia's Countervailing and Anti-Dumping Duties Act 1993, a "like product" is defined as:

"a product that is identical or alike in all respects to the subject merchandise or, in the absence of such a product, another product that although not alike in all respects has characteristics closely resembling the subject merchandise."

The determination of "like product" must be based on physical, technical, and chemical characteristics—not merely the coating or superficial appearance of the product. MITI's own Trade Remedies system confirms that "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, applications or uses that resemble those of the subject merchandise.

3. Our Subject Merchandise — Alloy Steel (HS 7225)

The subject merchandise we import is PPGL & Galvanized Steel (GL) made from an alloy steel base, classified under HS Code 7225.

Under the Harmonised System (HS) Chapter 72, flat-rolled products of other alloy steel of a width of 600mm or more fall under heading 7225. Conversely, flat-rolled products of iron or non-alloy steel fall under headings 7208, 7209, and 7210.

Note 1(f) to Chapter 72 of the Harmonised System provides that steel is classified as alloy steel according to its chemical composition. If the steel contains by weight one or more of the following elements in the proportion shown, it is an alloy steel:

Element Minimum % Required to be "Alloy Steel" at least for achieving one type of alloy contain.

- Boron 0.0008% or more

Our imported products contain this alloying element, which give our products specific physical, technical, and chemical characteristics required by our downstream customers.

4. The Malaysian Domestic Industry Produces Non-Alloy Steel — NOT Alloy Steel

The domestic producer that filed this petition is NS Bluescope Malaysia Sdn. Bhd.

Based on publicly available information:

· NS Bluescope's product portfolio consists of COLORBOND®, ZINCALUME®, and TRUECORE® — all using low-carbon steel as the base material.

· NS Bluescope's production process intentionally uses low-carbon steel to achieve required structural properties without alloy additions.

· In the 2020 anti-dumping investigation, NS Bluescope's petition explicitly covered non-alloy steel products under HS codes 7210 and 7212 — not HS 7225.

This confirms that NS Bluescope produces non-alloy steel (carbon steel), not the alloy steel that we import.

5. NS Bluescope's Products Are NOT "Like Products"

Since NS Bluescope's products have a non-alloy steel base, and our imported products have an alloy steel base, they are physically, technically, and chemically distinct.

Despite sharing the same zinc/aluminium coating, the base material chemistry is fundamentally different. Therefore, under the definition of "like product" in the Act, NS Bluescope's products are not like products to our subject merchandise.

Aspect	NS Bluescope's Production	Our Imported GL
Coating	Zinc/Aluminium	Zinc/Aluminium
Base Material etc.)	Non-alloy steel (carbon steel)	Alloy steel (contains Cr, Mn, B,
HS	Code 7210 / 7212	7225
Alloying Elements etc.	None (low-carbon steel)	Chromium, boron, manganese,

6. WTO "Like Product" Disciplines Support Our Position

Under the WTO Anti-Dumping Agreement, Article 2.6 provides that the term "like product" shall be interpreted to mean a product which is identical, i.e. alike in all respects to the product under consideration. As a fundamental proposition, it has been accepted that the definition of likeness is based on the physical characteristics of goods.

Since NS Bluescope's products and our subject merchandise have fundamentally different physical and chemical characteristics (non-alloy steel vs. alloy steel), they are not like products under WTO disciplines.

7. No "Like Product" Purchased from Other Sources

We do not purchase from any other domestic producer or from third countries (not subject to this investigation) a product that is physically, technically, and chemically identical to our alloy steel GL imports.

Therefore, we have zero quantity of "like product" to report in Table C-2.1.

8. Conclusion

We respectfully submit that:

1. No like product exists in Malaysia for our alloy steel GL imports because NS Bluescope produces non-alloy steel, not alloy steel;

2. Our entry of "0" (zero) in Table C-2.1 is accurate and reflects reality;

3. Blue Scope cannot claim injury from imports of a product they do not produce;

4. The investigation should be terminated or HS 7225 should be excluded from the scope of this investigation.

SECTION D: SALES

SECTION D-1: Sales Turnover

Question 1: Channels of Distribution

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

1.1 Overview

Our company is an importer and further processor of PPGL & GL alloy steel Galvanized Steel (GL) under HS Code 7225. We do not manufacture the raw steel. Our role is to:

1. Import the subject merchandise (PPGL & GL alloy steel coils) from overseas suppliers;
2. Further process the coils through cutting, forming, and packaging;
3. Sell the processed end products to customers in the Malaysian domestic market with next day delivery manner by own lorries.

We do not have any export sales — all our sales are made in the Malaysian domestic market.

1.2 Channels of Distribution

We have three distinct channels of distribution:

Channel	Description
1. Direct End Users	We sell processed end products (cut-to-size, formed sheets, panels, etc.) directly to manufacturers, construction companies, and other industrial users who use them as final components or raw materials in their own production/assembly processes.
2. Hardware Stores / Building Material Stockists / Metal Traders	We sell processed end products to hardware stores, building material stockists, and metal traders who resell the products to smaller end-users, contractors, or DIY consumers.
3. Related Companies Entities	We sell processed end products and raw material to related companies within our corporate group (e.g., sister companies or holding company). These are inter-company transactions.

No other distribution channels are used.

1.3 Customer Categorization

We categorize our customers based on their business type and relationship:

Customer Category	Description	Examples
Direct End Users	*Manufacturers, construction firms, and industrial users that use our processed products as final components or inputs*	*Roofing contractors, automotive parts manufacturers, appliance makers, structural fabricators*
Hardware Stores / Building Material Stockists / Metal Traders	Businesses that purchase and resell our products to smaller end-users, contractors, or DIY customers	Hardware stores, building material stockists, metal traders, wholesale suppliers
Related Companies Entities	Entities within our corporate group	Sister companies, holding company

Basis of Categorization:

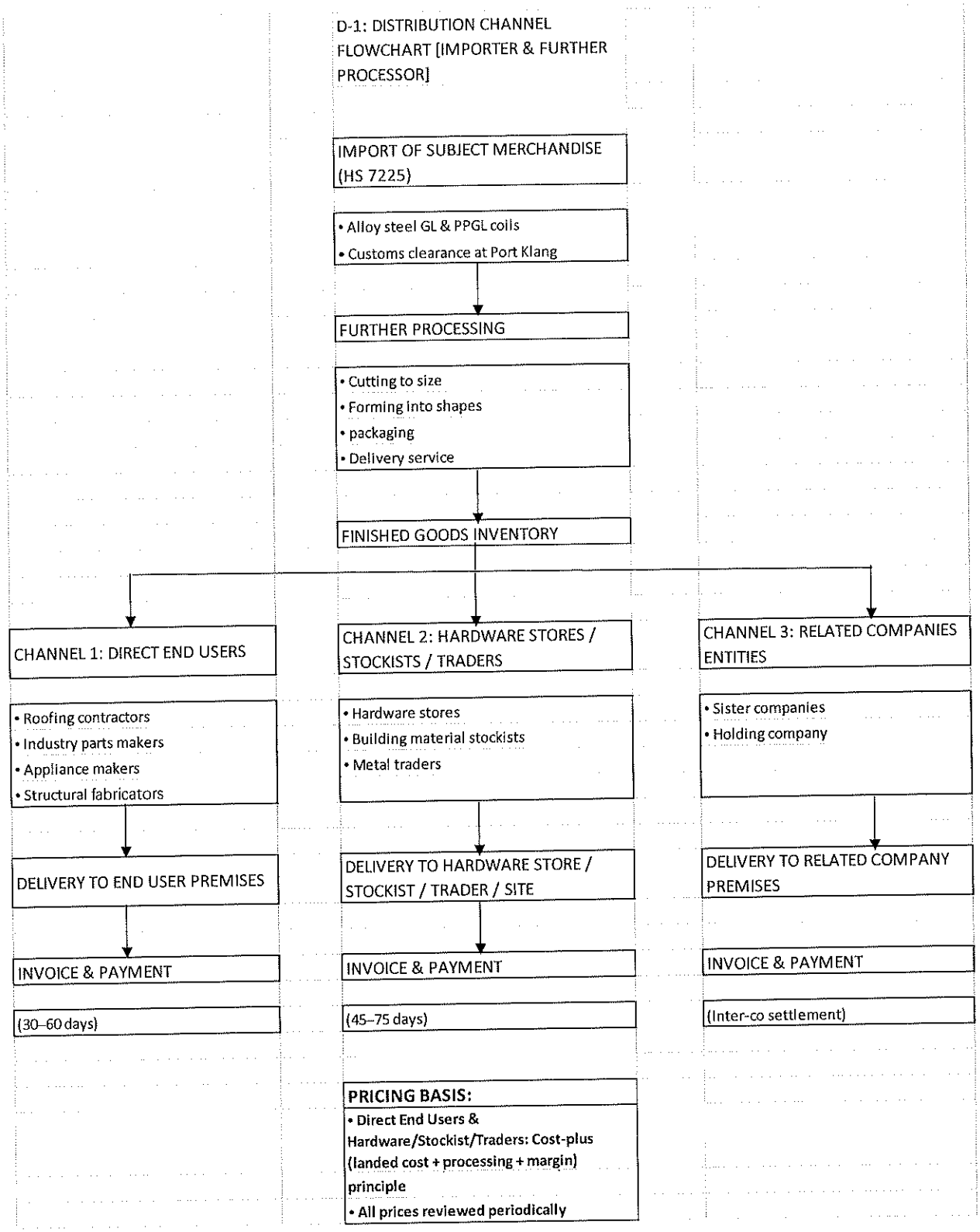
We categorize our customers based on:

1. Business type — direct end user, hardware store/stockist/trader, or related entity;
2. Volume of purchase — bulk vs. smaller quantities;
3. Relationship — unrelated (arm's length) vs. related (inter-company).
4. Service – next day delivery manner

1.4 Terms of Sale and Pricing

Aspect	Direct End Users	Hardware Stores / Stockists / Metal Traders	Related Companies Entities
Delivery Terms	EXW or delivered	EXW or delivered	EXW or delivered (per group policy)
Payment Terms	30-60 days credit	45-75 days credit	Inter-company settlement (60-90 days / netting)
Pricing Basis	Cost-plus (landed cost + processing cost + margin)	Cost-plus (landed cost + processing cost + margin)	Arm's length principle (benchmarked against unrelated transactions)
Currency	MYR	MYR	MYR
Discounts	Volume discounts available	Volume discounts available	As per group policy (benchmarked)

1.5 Distribution Flowchart



Question 2: Detailed Description of Sales Process

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.

2.1 Sales Process Steps (Unrelated Companies — Direct End Users & Hardware Stores/Stockists/Traders)

Step	Description	Average Timeframe
1. Customer Enquiry	Customer contacts us with product requirements (specifications, quantity, delivery date)	1-2 days
2. Quotation	We prepare and send a quotation based on processing costs, material availability, and market pricing	1-2 days
3. Price Negotiation	Customer may negotiate price, especially for bulk orders	1-2 days
4. Order Confirmation	Customer issues Purchase Order (PO); we confirm acceptance	1-2 days
5. Production/Processing	We process the raw coils (cutting, forming, packaging) according to customer specifications	1-2 days
6. Delivery Arrangement	We arrange transport (own fleet or third-party logistics)	1-2 days
7. Delivery to Customer	Goods are delivered to customer's premises (or collected if EXW)	1-2 days
8. Customer Receipt & Inspection	Customer receives goods, inspects quantity and quality, signs delivery order	5 days
9. Invoicing	We issue commercial invoice to customer	1 day
10. Payment	Customer pays within agreed credit terms (typically 30-60 days)	30-60 days

Total Average Timeframe: Approximately 31–80 days from enquiry to payment receipt (including processing time).

2.2 Sales Process Steps (Related Companies Entities)

Step	Description	Average Timeframe
1. Internal Requisition	Related entity submits internal requisition or PO	1-2 days
2. Order Confirmation	We confirm acceptance and production schedule	1-2 days
3. Production/Processing	Process according to specifications	1-2 days
4. Delivery	Deliver to related company premises	1-2 days
5. Invoicing	Issue commercial invoice (with inter-company marking)	1 day
6. Payment	Inter-company settlement (netting or 90-120 days)	60-90 days

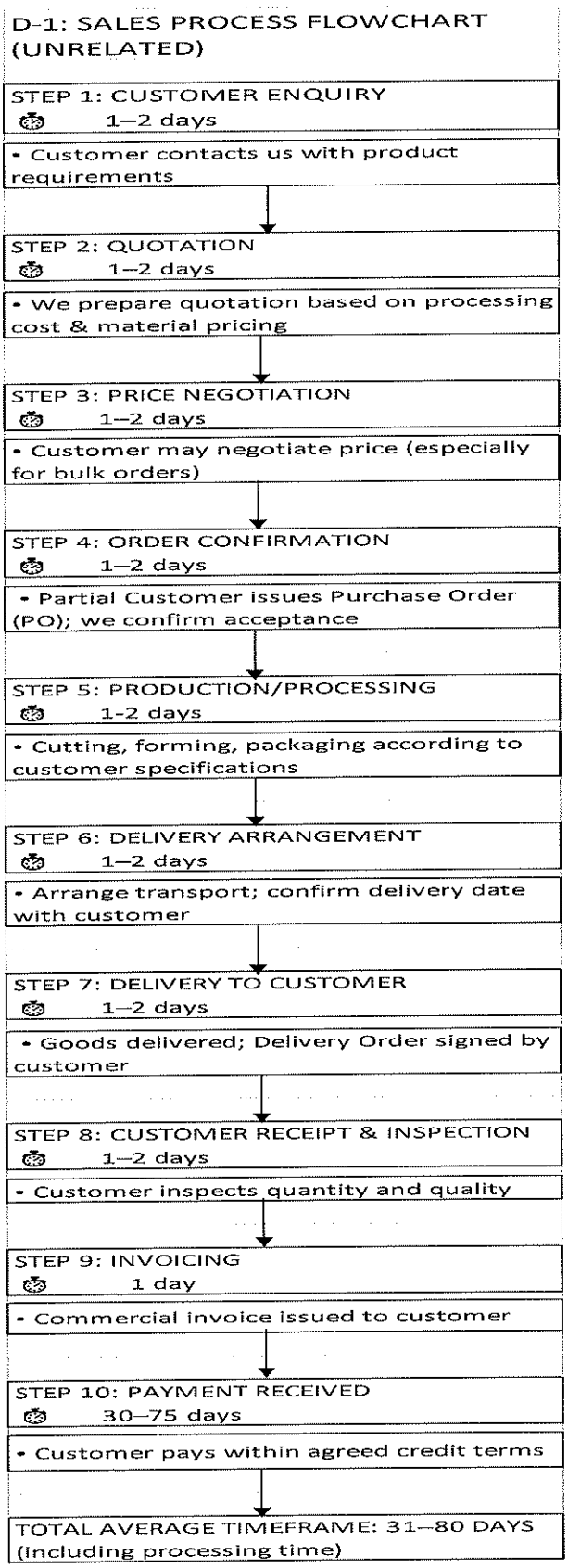
2.3 Invoicing Process

Step	Description
1. Delivery Order (DO)	Issued at time of delivery, signed by customer upon receipt
2. Commercial Invoice	Issued after delivery, containing: invoice number, date, customer details, product description, quantity, unit price, total value, payment terms, delivery terms
3. Payment Advice	Customer issues payment advice or remittance advice upon payment
4. Accounting Entry	Payment is recorded in our accounting system and reconciled against the invoice

2.4 Payment Process

Payment Method	Direct End Users	Hardware Stores / Stockists / Traders	Related Companies Entities
Bank Transfer (TT)	Yes	Yes	No
Cheque	Yes (less common)	Yes (less common)	No
Inter-company Settlement	No	No	Yes (netting)
Credit Terms	30-60 days	45-75 days	60-90 days

2.5 Sales Process Flowchart



Question 3: Sales Negotiation Process

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.

3.1 Sales Negotiation Process Steps

Step	Description
1. Initial Contact	Customer contacts us via phone, email, or in-person meeting to enquire about product availability and pricing
2. Needs Assessment	We discuss the customer's specific requirements: product type, dimensions, quantity, delivery timeline
3. Quotation	We provide a written quotation based on processing costs, material costs, and market conditions
4. Price Discussion	Customer may request price adjustments, especially for bulk orders or long-term relationships
5. Counter-Offer	If the customer proposes a different price, we evaluate and respond with a counter-offer (if feasible)
6. Agreement	Final price and terms are agreed upon
7. Order Placement	Customer issues Purchase Order (PO) with agreed terms
8. Post-Sale Price Adjustments	Any adjustments (e.g., for quality issues, quantity discrepancies) are handled on a case-by-case basis; these are rare

3.2 Variations by Customer Class

Customer Class	Negotiation Variation
Direct End Users	Typically focused on specifications and quality; price negotiation is important but secondary to meeting exact requirements
Hardware Stores / Stockists / Metal Traders	Typically price-sensitive; may negotiate for volume discounts or better payment terms; may have standard product requirements rather than custom specifications
Related Companies Entities	Negotiation follows group policy; prices benchmarked against unrelated transactions; arm's length principle applied

3.3 After-Sales Price Adjustments

After-sales price adjustments are rare in our business. If they occur, they are handled as follows:

Reason for Adjustment	Process
Quality Issues	Customer provides evidence; we investigate; if valid, we issue credit note or replacement
Quantity Discrepancies	Customer notifies us; we verify against delivery records; if discrepancy confirmed, we issue credit note
Price Re-negotiation	Usually only for long-term contracts or large-volume customers; prices may be reviewed periodically based on market conditions

Question 4: Production Schedule

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.

4.1 Our Company is an Importer and Further Processor

We wish to clarify that our company is an importer and further processor, not a primary manufacturer of steel. Our production/processing activities (cutting, forming, packaging and next day delivery) begin after customer orders are confirmed.

4.2 Production/Processing Basis

Aspect	Detail
Order-Driven Processing	We process the raw coils after receiving customer Purchase Orders / written confirmation with specific product specifications (dimensions, shapes, quantities)
Inventory-Based Processing	We also maintain a safety stock of commonly requested processed products for faster delivery to regular customers
Lead Time	Processing lead time is approximately 1-2 days after order confirmation, depending on order complexity

4.3 Production/Processing Process

1. Customer places Purchase Order (PO) and written confirmation with us;
2. We check inventory of raw coils and processed stock;
3. If standard processed stock is available, we deliver from existing inventory;
4. If custom processing is required, we schedule production (cutting, forming, packaging);
5. We process according to customer specifications;
6. We inspect quality and package the finished products;
7. We deliver to the customer priority by next day delivery services.

Question 5: Sales Contracts

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 like products, including the terms, the requirements for a price change or renegotiation by either side, etc. Explain any commitments on either party, should the contract be terminated prematurely.

5.1 Type of Contracts

Our company does not have long-term contracts with customers. All sales are made on a transaction-by-transaction basis through individual Purchase Orders (POs).

Contract Type	Does Our Company Use?
Long-Term Contracts	No
Short-Term Contracts	No
Individual Purchase Orders (POs)	Yes, partially PO sales / written confirmation

5.2 Process for Agreeing to Prices and Quantities

Step	Description
1. Customer Enquiry	Customer enquires about product availability and price
2. Quotation	We provide a quotation with price, quantity, and delivery terms
3. Negotiation	Price and quantity are negotiated (if applicable)
4. Purchase Order	Customer issues a PO / written confirmation with agreed price, quantity, and delivery terms (partially)
5. Order Confirmation	We confirm acceptance of the PO
6. Production/Processing	We process and deliver the goods as per the PO or written confirmation orders

5.3 Terms of the Purchase Order

Each Purchase Order typically contains:

Term	Description
Product Description	Product type, dimensions, shape, specifications
Quantity	Quantity ordered (in length ft, pieces, or units)
Unit Price	Price per unit (in MYR/ft)
Total Value	Total value of the order
Delivery Date	Agreed delivery date
Delivery Terms	EXW or delivered to customer premises
Payment Terms	Credit terms (typically 30-75 days)

5.4 Price Changes and Renegotiation

Aspect	Detail
Price Changes	Prices are fixed at the time of the PO. There is no provision for price changes unless agreed by both parties
Renegotiation	Renegotiation may occur for future orders based on market conditions, but not for existing POs
Both Sides	Either party may request renegotiation, but it requires mutual agreement

5.5 Premature Termination

Aspect	Detail
Commitments	There are no long-term commitments by either party
Termination	Either party may terminate a PO before delivery, but this is subject to negotiation
Penalties	There are no formal penalties for premature termination, but we may require compensation for processing costs already incurred (e.g., materials cut to specific sizes)

Question 6: Price Lists

Provide copies of all price lists issued or in use for Year 1, Year 2 and POI for all 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.

6.1 Price Lists

Our company does not issue formal price lists. Prices are determined on a transaction-by-transaction basis based on:

Factor	Description
Landed Cost of Raw Material	Current cost of the alloy steel GL coils from overseas suppliers (CIF + duties + freight)
Processing Cost	Cost of cutting, forming, and packaging (labour, machine operation, consumables)
Market Conditions	Current market prices for similar processed products in Malaysia
Order Volume	Quantity ordered (volume discounts may apply)
Customer Category	Direct end users, hardware stores/stockists/traders, and related companies may have different pricing structures
Customer Relationship	Long-term customers may receive more favourable pricing
Product Specifications	Different dimensions, shapes, and complexity have different processing costs

6.2 How Final Sales Price is Established

Step	Description
1. Calculate Landed Cost	Determine the landed cost of the raw coils (CIF + duties + freight + handling)
2. Calculate Processing Cost	Determine the cost of cutting, forming, and packaging (labour, machine, consumables)
3. Add Margin	Add a commercial margin (percentage markup) based on market conditions
4. Adjust for Volume	Apply volume discount if applicable
5. Adjust for Customer Category	Consider customer type (direct end user, hardware store/stockist/trader, related company)
6. Final Price	The final price is quoted to the customer

6.3 Price Differences

Aspect	Do Prices Differ?	Explanation
Between Customers	Yes	Prices may differ based on customer category, order volume, and payment terms
Between Related and Unrelated	Yes	Related company prices are set based on the arm's length principle; they are benchmarked against unrelated prices but may differ due to volume or specific group policies
Between Regions	No	All sales are in Malaysia; no regional price differences
Between Time Periods	Yes	Prices change over time due to fluctuations in import costs, processing costs, and market conditions

Question 7: Pricing Basis (if price lists not used)

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.

7.1 Pricing Basis

As stated in our response to Question 6, our company does not use price lists. Instead, prices are fixed during sales negotiations based on the following:

Basis	Description
1. Landed Cost	The total cost of bringing the raw coils to Malaysia (CIF + import duties + freight + handling charges)
2. Processing Cost	The cost of cutting, forming, and packaging (labour, machine operation, consumables)
3. Market Price	Current market prices for similar processed products in Malaysia
4. Competitor Pricing	Prices offered by other suppliers in the market
5. Order Volume	Larger orders may receive volume discounts
6. Customer Category	Direct end users, hardware stores/stockists/traders, and related companies may have different pricing structures
7. Customer Relationship	Long-term or strategic customers may receive preferential pricing
8. Payment Terms	Customers with shorter payment terms may receive better pricing
9. Product Specifications	Different dimensions, shapes, and complexity have different processing costs

7.2 How Prices are Fixed During Negotiations

Step	Description
1. Cost Assessment	We calculate the landed cost of the raw coils and the processing cost for the specific product
2. Market Assessment	We assess current market prices for similar processed products
3. Margin Determination	We determine the desired margin based on market conditions and business strategy
4. Initial Quote	We provide an initial quote to the customer
5. Negotiation	Customer may propose a counter-offer; we evaluate and respond
6. Final Agreement	Both parties agree on the final price
7. Confirmation	The agreed price is confirmed in the Purchase Order

7.3 Pricing for Related Companies

For related companies, prices are determined as follows:

Step	Description
1. Cost Calculation	Determine the landed cost of raw coils and processing cost
2. Add Margin	Apply a margin based on the arm's length principle
3. Benchmarking	Compare against prices charged to unrelated customers for similar products and volumes
4. Transfer Pricing Compliance	Ensure compliance with Section 140A of the Income Tax Act 1967 and transfer pricing guidelines
5. Documentation	Maintain transfer pricing documentation to support the pricing policy

We confirm that related company prices are set at arm's length and do not give any unfair advantage that would distort the anti-dumping investigation.

Question 8: Financial Documents

8.1 Company Functions

We tick the following functions that apply to our company:

Function	Tick	Explanation
An importer of the subject merchandise	Yes	We import alloy steel GL coils under HS Code 7225 from overseas suppliers
A trader	Yes	We purchase and resell processed products without further processing beyond our cutting/forming operations
A distributor	Yes	We supply processed products to direct end users, hardware stores/stockists/traders, and related companies
A further processor	Yes	We engage in cutting, forming, and packaging of the subject merchandise

8.2 Financial Documents Required

We are required to provide the following financial documents for the most recent three completed financial years:

Document	Description	Status
Chart of Accounts	A complete list of all accounts used in our accounting system in the confidential version	To attach
Trial Balance	A summary of all account balances at the end of each financial year in the confidential version	To attach
Audited Consolidated Financial Statements	Audited financial statements for the group (if applicable) in the confidential version	To attach
Audited Unconsolidated Financial Statements	Audited financial statements for our company only in the confidential version	To attach
Notes to the Accounts	Explanatory notes accompanying the financial statements in the confidential version	To attach
Auditor's Opinion	The auditor's report and opinion on the financial statements in the confidential version	To attach

DECLARATION

We confirm that, to the best of our knowledge:

1. The information provided in this section is accurate, complete, and true;

2. We sell to direct end users, hardware stores / building material stockists / metal traders, and related company's entities;

3. Prices charged to related companies are set at arm's length in compliance with Malaysian transfer pricing regulations;

4. We maintain transfer pricing documentation to support our related-party pricing;

5. All unrelated sales are at arm's length with normal commercial terms;

6. We have no export sales — all sales are in the Malaysian domestic market;

7. We do not use long-term contracts or standard contracts;

8. All prices are determined on a transaction-by-transaction basis based on the factors described above;

9. We engage in further processing (cutting, forming, packaging, delivery service aiming next day delivery manner) before selling to customers.

D-1: TRADER

Question 1: Invoice Addresses

Please indicate to whom the exporter's/producer's invoice(s) are addressed. (Tick all that apply to your company):

Option	Tick (Yes/No)	Explanation
Your Company	Yes	The exporter's/producer's invoices are addressed to our company as we are the importer
Recipient/End User of the Product	No	The exporter's/producer's invoices are not addressed directly to the end user. All invoices are addressed to our company.

We confirm that all exporter's/producer's invoices are addressed to our company as the importer. The invoices are not addressed directly to the end user or recipient of the product.

Question 2: Commission Received

Provide any commission received from the exporter/producer.

We confirm that no commission has been received from the exporter/producer (**Company C**) in respect of the subject merchandise purchases. All transactions are conducted on an arm's length basis.

If any commission were to be received, we would disclose it in our accounting records. However, to date, no such commission has been received.

Question 3: Terms of Sale

Indicate the terms of sale for all or the majority of your sales of the like product/subject merchandise (e.g., free into store 30 days, etc.).

Terms of Sale for Majority of Sales:

Aspect	Detail
Delivery Terms	Ex-Warehouse (EXW) or delivered to customer's premises
Payment Terms	30 - 90 days credit from invoice date
Pricing	Cost-plus (based on landed cost + processing cost + margin)
Currency	MYR
Discounts	Volume discounts available for bulk purchases
Minimum Order	No minimum order quantity (subject to stock availability) – service base philosophy

Variations by Customer Category:

Customer Category	Terms of Sale
Direct End Users	EXW or delivered; 30-60 days credit; volume discounts available
Hardware Stores / Stockists / Metal Traders	EXW or delivered; 45-75 days credit; volume discounts available
Related Companies Entities	EXW or delivered; inter-company settlement (60-90 days / netting); arm's length pricing

Question 4: Average Lead Time

Indicate the average lead time between a customer's order and the date of delivery for your sales of the like product/subject merchandise.
Average Lead Time:

Scenario	Timeframe
From order to delivery (if stock available)	1-2 days
From order to delivery (if custom processing required)	1-2 days
From order to delivery (if raw material not in stock)	subject to import lead time
Average overall lead time	Approximately 1-2 days for stock items; 1-2 days for custom processing; 30-60 days for non-stock items

Lead Time Breakdown (Stock Available):

Step	Timeframe
Order processing	1-2 days
Delivery arrangement	1-2 days
Delivery to customer	1-2 days
Total	1-2 days

Lead Time Breakdown (Custom Processing Required):

Step	Timeframe
Order processing	1-2 days
Cutting/Forming/Packaging	1-2 days
Delivery to customer	1-2 days
Total	1-2 days

Lead Time Breakdown (Raw Material Not in Stock):

Step	Timeframe
Order from overseas supplier	30-60 days (manufacturing + shipping)
Customs clearance	3-7 days
Processing (cutting/forming/packaging)	1-2days
Delivery to customer	1-2days
Total	34-69 days

Question 5: Labelling and Packing

Indicate whether your company itself labels and/or packs the purchased like product/subject merchandise, whether it uses a specialised company for labelling and/or packing as a subcontractor or whether the product is sold as such.

Option	Tick (Yes/No)	Explanation
We label and/or pack the product ourselves	Yes	We label the value added product with our company's label/sticker before delivery and pack the finished products after processing
We use a specialised company for labelling/packing	No	We do not use a subcontractor for labelling or packing
We sell the product as such (no labelling/packing)	No	We do not sell the product as such; we label and pack the processed products ourselves

Further Details:

· Our company labels the product with our company's branding/label before delivery to customers;

· Our company packs the product after processing (cutting, forming) — we strap, wrap, palletize, and prepare for delivery;

· No subcontractor is used for labelling or packing activities;

· The product is sold as a processed finished good with our label and packaging.

Question 6: Sales Data Table D-1.1 (Trader) – "We refer to Table D-1.1 (Trader) in the confidential version for transaction-by-transaction details"

Provide all sales of like product/subject merchandise in Malaysian market during Year 1, Year 2 and POI. For this purpose, use Excel format as per Table D-1.1.

DECLARATION

We confirm that, to the best of our knowledge:

1. All exporter/producer invoices are addressed to our company;
2. No commission has been received from the exporter/producer;
3. Terms of sale are as described above;
4. Average lead times are as described above;
5. We label and pack the value added product ourselves;
6. The sales data provided is accurate, complete, and true;
7. All sales are in MYR;
8. Related company sales are indicated with "R" in the CUST-REL column.

QUESTION 7: COST ALLOCATION (D-1.2 & D-1.3)

7a. Justification for Using Average Cost

Provide the justification if your company uses the average cost (V).

Our company uses the weighted average cost method for inventory valuation and cost of goods sold calculation. This is consistent with our normal accounting practices and is in accordance with Malaysian Financial Reporting Standards (MFRS).

Justification for Using Average Cost:

Reason	Explanation
1. Consistency	The average cost method is consistently applied across all our products and is part of our standard accounting policy
2. Simplicity	It provides a practical and efficient way to value inventory when dealing with multiple shipments of similar products
3. Smoothing Effect	It smooths out price fluctuations between different shipments, providing a more stable cost basis
4. Compliance	The method is in accordance with MFRS and is accepted by our auditors
5. Traceability	All costs are traceable to our accounting records and can be reconciled to our audited financial statements

We confirm that the average cost method is used consistently for subject merchandise and is reflected in our audited financial statements.

7b. Methodology for Allocating Costs

Explain in detail the methodology used to allocate purchase cost, selling, general and administrative (SG&A) expenses and other expenses incurred to the like product/subject merchandise.

7b(i): Allocation Basis Used for Each Category of Expense

Expense Category	Allocation Basis	Description
Purchase Cost	Actual cost (weighted average)	Direct purchase cost of the subject merchandise, using weighted average cost method
Processing Cost	Actual cost	Direct cost of cutting, forming, and packaging (labour, machine operation, consumables)
Selling Expenses	Sales value	Allocated based on the proportion of sales value of the subject merchandise to total sales value
General & Administrative (G&A) Expenses	Sales value	Allocated based on the proportion of sales value of the subject merchandise to total sales value
Other Expenses	Sales value	Allocated based on the proportion of sales value of the subject merchandise to total sales value

7b(ii): Reasons for Selecting the Allocation Basis

Reason	Explanation
1. Sales Value Basis	This is the most appropriate basis as it reflects the relative revenue contribution of the subject merchandise to the overall business. It reasonably reflects the costs attributable to the product.
2. Consistency with Accounting Practices	Our company uses sales value as the allocation basis for SG&A expenses in our normal accounting practices. This is consistent with how we report expenses internally.
3. Reasonable Reflection of Costs	SG&A expenses and other expenses are generally driven by sales activity. Allocating based on sales value reasonably reflects the costs attributable to the subject merchandise.
4. Verifiability	The allocation basis is easily verifiable from our accounting records and can be reconciled to our audited financial statements.

7b(iii): Consistency with Normal Accounting Practices

We confirm that the allocation methodology described above is consistent with our company's normal accounting practices and is reflected in our audited financial statements. The same allocation basis is used for internal management reporting and external financial reporting.

7b(iv): Supporting Documents
We attach the following supporting documents substantiating the calculation of allocated purchase cost, SG&A expenses, and other expenses:

Document	Description
1. Trial Balance	Trial balance for Year 1, Year 2, and POI refer to confidential version

We refer to Section D-1, Question 7 of the questionnaire concerning the cost allocation methodology for the subject merchandise in the Malaysian market.

1. Table D-1.2 – Total Cost of the Like Product

Description	Year 1 / Year 2 / POI	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
Purchase cost	Act/Avg	N/A	N/A	N/A	N/A	N/A
	Total Value (MYR)	0	0	0	0	0
	Value Per Unit (MYR/MT)	N/A	N/A	N/A	N/A	N/A
Processing costs	Act/Avg	N/A	N/A	N/A	N/A	N/A
	Total Value (MYR)	0	0	0	0	0
	Value Per Unit (MYR/MT)	N/A	N/A	N/A	N/A	N/A
Selling, General and Administration costs (SGA)	Act/Avg	N/A	N/A	N/A	N/A	N/A
	Total Value (MYR)	0	0	0	0	0
	Value Per Unit (MYR/MT)	N/A	N/A	N/A	N/A	N/A
Other costs (Freight/Delivery)	Act/Avg	N/A	N/A	N/A	N/A	N/A
	Total Value (MYR)	0	0	0	0	0
	Value Per Unit (MYR/MT)	N/A	N/A	N/A	N/A	N/A
Total cost	Act/Avg	N/A	N/A	N/A	N/A	N/A
	Total Value (MYR)	0	0	0	0	0
	Value Per Unit (MYR/MT)	N/A	N/A	N/A	N/A	N/A

This table is completed with "N/A" and "0" because our company does not have any "Like Product".

As established in Section C-2, we do not purchase, process, or sell any alloy steel GL from non-subject countries or domestic sources that could be classified as a "Like Product". All our processing activities (cutting, forming, packaging) are performed exclusively on the Subject Merchandise (PPGL & GL alloy steel imported from the subject countries).

Therefore, the total cost of the Like Product is zero for all periods.

2. Table D-1.3 – Cost Per Unit of the Subject Merchandise (To our best knowledge)

We provide the cost per unit for the Subject Merchandise in Table D-1.3: (Refer Excel Table D-1.3)

Table D-1.3 (To our best knowledge and workout for overall sales)

Descriptioon	Year 1		Year 2		POI	
	Average (V)	RM/MT	Average (V)	RM/MT	Average (V)	RM/MT
Purchase Cost	100	100	94	92	87	79.00
Selling, General and Administration costd (SGA)	13	147	16	31	158	37.00
Other costs	0	0	0	0	0	0
Total cost	113	150	110	123	101	117.00

Table D-1.3 (To our best knowledge and workout for trader related company)

Descriptioon	Year 1		Year 2		POI	
	Average (V)	RM/MT	Average (V)	RM/MT	Average (V)	RM/MT
Purchase Cost	100.00	100	97.00	92.00	99.00	79.00
Selling, General and Administration costd (SGA)	127.00	13.00	139.00	13.00	178.00	14.00
Other costs	0	0	0	0	-0	0
Total cost	113.00	113.00	115.00	105.00	125.00	94.00

Our company operates with Y cores product lines. Since our accounting system does not trace costs directly to individual products, we have allocated cost based on sales value proportion.

Allocation Basis:

i. Purchase Cost: Actual cost traced directly to the subject merchandise using the weighted average cost method (V)
ii. SGA Expenses: Allocated based on the proportion of subject merchandise sales to total company sales
iii. 0 for Other cost as processing costs are included in SGA

3. Cost Allocation Methodology

Expense Category	Allocation Basis	Reason
Purchase Cost	Actual cost (weighted average)	Direct cost of the raw material; traced from purchase records
Processing Costs	Actual cost	Direct cost of cutting, forming, and packaging; traced from production records
Selling Expenses	Sales value	Proportion of sales value of subject merchandise to total sales
G&A Expenses	Sales value	Proportion of sales value of subject merchandise to total sales
Other Expenses	Sales value	Proportion of sales value of subject merchandise to total sales

4. Justification for Average Cost

We confirm that we use the weighted average cost method for inventory valuation and cost of goods sold calculation. This method is:

· Consistently applied across all products;

· In accordance with Malaysian Financial Reporting Standards (MFRS);

· Accepted by our auditors;

· Traceable to our accounting records.

5. Supporting Documents Attached

Document Description

Document	Description
Table D-1.2	Total cost of Like Product (N/A all zeros)
Table D-1.3	Cost per unit of Subject Merchandise
Cost Allocation Schedule	Detailed schedule of cost allocation methodology
Reconciliation to Audited Financial Statements	Reconciliation of allocated costs to audited financial statements
General Ledger Extract	Extract from general ledger showing relevant costs
Trial Balance	Trial balance for Year 1, Year 2, and POI

We trust the attached response and supporting documents are in order. Should the Ministry require any clarification or additional information, please do not hesitate to contact us.

SECTION D-2: DISTRIBUTOR

Table D-2.2: Percentage of Sales of the Subject Merchandise (Refer Excel Table D-2.2)

Table D-2.2: Percentage of Sales of the Subject Merchandise

					total sales	net sales
Year / Quarter	**Quantity** *(Specify unit of measurement)* **/ Value** *(Specify currency)*	**Sales of subject merchandise (A)** Gross Sales	**Total sales** Gross Sales	**Net sales (B)** Net sales	**Percentage (%) (A/B x 100)**	**Percentage (%) (A/B x 100)**
Year 1 /Q1	**Quantity**					
	Value	100.00	260.00	257.00	38.46%	38.91%
Year 1 /Q2	**Quantity**					
	Value	98.00	278.00	275.00	35.25%	35.64%
Year 1 /Q3	**Quantity**					
	Value	64.00	217.00	216.00	29.49%	29.63%
Year 1 /Q4	**Quantity**					
	Value	110.00	262.00	262.00	41.98%	41.98%
Total Year 1	**Quantity**					
	Value	372.00	1,017.00	1,010.00	36.58%	36.83%
Year 2 /Q1	**Quantity**					
	Value	88.00	249.00	248.00	35.34%	35.48%
Year 2 /Q2	**Quantity**					
	Value	76.00	229.00	228.00	33.19%	33.33%
Year 2 /Q3	**Quantity**					
	Value	83.00	276.00	276.00	30.07%	30.07%
Year 2 /Q4	**Quantity**					
	Value	109.00	275.00	272.00	39.64%	40.07%
Total Year 2	**Quantity**					
	Value	356.00	1,029.00	1,024.00	34.60%	34.77%
POI /Q1	**Quantity**					
	Value	92.00	277.00	275.00	33.21%	33.45%
POI /Q2	**Quantity**					
	Value	78.00	329.00	323.00	23.71%	24.15%
POI /Q3	**Quantity**					
	Value	89.00	330.00	328.00	26.97%	27.13%
POI /Q4	**Quantity**					
	Value	85.00	292.00	290.00	29.11%	29.31%
Total POI	**Quantity**					
	Value	344.00	1,228.00	1,228.00	28.01%	28.01%

Key Observations from Data (Import & Sales in the equal Quantity):

We Only managed to trace Value in RM sales by quarter but not able to get the quantity in MT due to our system not able to trace by weight in the system.

Question 2: Terms of Sale

Indicate the terms of sale for all or the majority of your sales of the like product/subject merchandise (e.g., free into store 30 days, etc.).

Terms of Sale for Majority of Sales:

Aspect	Detail
Delivery Terms	Ex-Warehouse (EXW) or delivered to customer's premises
Payment Terms	30-75 days credit from invoice date
Pricing	Cost-plus (based on landed cost + processing cost + margin)
Currency	MYR
Discounts	Volume discounts available for bulk purchases
Minimum Order	No minimum order quantity (subject to stock availability)

Variations by Customer Category:

Customer Category Terms of Sale

Customer Category	Terms of Sale
Direct End Users	EXW or delivered; 30-60 days credit; volume discounts available
Hardware Stores / Stockists / Metal Traders	EXW or delivered; 45-75 days credit; volume discounts available
Related Companies Entities	EXW or delivered; inter-company settlement (60-90 days / netting); arm's length pricing

Question 3: Average Lead Time

Indicate the average lead time between a customer's order and the date of delivery for your sales of the like product/subject merchandise.

Average Lead Time:

Scenario	Timeframe
From order to delivery (if stock available)	1-2 days
From order to delivery (if custom processing required)	1-2 days
From order to delivery (if raw material not in stock)	30-60 days (subject to import lead time)
Average overall lead time	Approximately 1-2 days for stock items; 1-2 days for custom processing; 30-60 days for non-stock items

Lead Time Breakdown (Stock Available):

Step	Timeframe
Order processing	1-2 days
Delivery arrangement	1-2 days
Delivery to customer	1- 2 days
Total	1-2 days (All step sequences done simultaneously in the best service of next day delivery manner)

Lead Time Breakdown (Custom Processing Required):

Step	Timeframe
Order processing	1-2 days
Cutting/Forming/Packaging	1-2 days
Delivery to customer	1-2 days
Total	1-2 days (all step sequences done simultaneously in the best service of next day delivery manner)

Lead Time Breakdown (Raw Material Not in Stock):

Step	Timeframe
Order from overseas supplier	30-60 days (manufacturing + shipping)
Customs clearance	3-7 days
Processing (cutting/forming/packaging)	5-10 days
Delivery to customer	1-3 days
Total	39-80 days

Question 5 - Written Explanation for Table D-2.4

Description	Year 1	Year 2	POI
	Actual (A) or Average (V)	Value Per Unit (MYR/MT)	Actual (A) or Average (V)
Purchase cost	N/A	0	N/A
Selling, General and Administration costs (SGA)	N/A	0	N/A
Other costs (please specify)	N/A	0	N/A
Total cost	N/A	0	N/A

We confirm that Table D-2.4 is completed with "N/A" and "0" because our company does not have any "Like Product".

As established in Section C-2, we do not purchase, process, or sell any alloy steel GL from non-subject countries or domestic sources that could be classified as a "Like Product". All our processing activities (cutting, forming, packaging) are performed exclusively on the Subject Merchandise (alloy steel GL imported from the subject countries).
Therefore, the total cost of the Like Product is zero for all periods.

Table D-2.5: Cost of the Subject Merchandise (To our best knowledge)

Table D-2.5 (To our best knowledge and workout for overall sales)

Descriptioon	Year 1		Year 2		POI	
	Average (V)	RM/MT	Average (V)	RM/MT	Average (V)	RM/MT
Purchase Cost	100	100	94	92	87	79.00
Selling, General and Administration costd (SGA)	13	147	16	31	158	37.00
Other costs	0	0	0	0	0	0
Total cost	113	150	110	123	101	117.00

Year	Trader Sales RM	Trader MT	Distributor & Further Processor	Total gross sales
2023	100.00	100	227.00	327.00
2024	98.00	105	216.00	314.00
2025	104.00	125	199.00	303.00

We only able to trace Value RM sales for Distribution & Further Processor but manage to trace the MT for Trader Sales. Since we are both a distributor and a Further Processor as we sell the same processed product (alloy steel GL & PPGL that we cut, form, and package and aiming next day delivery services), the sales data is exactly the same for both roles.

The products we distribute (send to hardware stores, end-users) is the same product we further processed (cut, form and pack)

Therefore, the Sales Data (Table D-2.5) and the Cost of Goods Sold (Table D-3.6) will be identical

Question 5a: Justification for Using Average Cost

Our company uses the weighted average cost method for inventory valuation and cost of goods sold calculation. This is consistent with our normal accounting practices and is in accordance with Malaysian Financial Reporting Standards (MFRS).
Justification for Using Average Cost:

Reason	Explanation
1. Consistency	The average cost method is consistently applied across all our products and is part of our standard accounting policy
2. Smoothing Effect	It smooths out price fluctuations between different shipments, providing a more stable cost basis
3. Compliance	The method is in accordance with MFRS and is accepted by our auditors
4. Traceability	All costs are traceable to our accounting records and can be reconciled to our audited financial statements
5. Simplicity	It provides a practical and efficient way to value inventory when dealing with multiple shipments of similar products

We confirm that the average cost method is used consistently for the Subject Merchandise and is reflected in our audited financial statements.

Question 5b: Methodology for Allocating Costs

Explain in detail the methodology used to allocate purchase cost, selling, general and administrative (SG&A) expenses and other expenses incurred to the like product/subject merchandise.

5b(i): Allocation Basis Used for Each Category of Expense

Expense Category	Allocation Basis	Description
Purchase Cost	Actual cost (weighted average)	Direct purchase cost of the Subject Merchandise, using weighted average cost method traced from purchase records
Processing Costs	Actual cost (weighted average)	Direct cost of cutting, forming, and packaging (labour, machine operation, consumables) traced from production records
Selling Expenses	Sales value	Allocated based on the proportion of sales value of the Subject Merchandise to total sales value
General & Administrative (G&A) Expenses	Sales value	Allocated based on the proportion of sales value of the Subject Merchandise to total sales value
Other Expenses	Sales value	Allocated based on the proportion of sales value of the Subject Merchandise to total sales value

5b(ii): Reasons for Selecting the Allocation Basis

Reason	Explanation
1. Sales Value Basis	This is the most appropriate basis as it reflects the relative revenue contribution of the Subject Merchandise to the overall business. It reasonably reflects the costs attributable to the product.
2. Consistency with Accounting Practices	Our company uses sales value as the allocation basis for SG&A expenses in our normal accounting practices. This is consistent with how we report expenses internally.
3. Reasonable Reflection of Costs	SG&A expenses and other expenses are generally driven by sales activity. Allocating based on sales value reasonably reflects the costs attributable to the Subject Merchandise.
4. Verifiability	The allocation basis is easily verifiable from our accounting records and can be reconciled to our audited financial statements.
5. Actual Cost for Direct Costs	Purchase costs and processing costs are direct costs that can be specifically identified and traced to the Subject Merchandise, so actual cost allocation is most appropriate.

5b(iii): Consistency with Normal Accounting Practices

We confirm that the allocation methodology described above is consistent with our company's normal accounting practices and is reflected in our audited financial statements. The same allocation basis is used for internal management reporting and external financial reporting.

5b(iv): Supporting Documents

We attach the following supporting documents substantiating the calculation of allocated purchase cost, SG&A expenses, and other expenses:

Document	Description
1. Trial Balance	Trial balance for Year 1, Year 2, and POI refer to confidential version

Section D-3: FURTHER PROCESSOR

Table D-3.1: Like Product Used in Production Process

(Since we do not process any "like Product," all entries are "0" or "N/A")

We confirm that Table D-3.1 is completed with "0" and "N/A" because we do not use any "Like Product" in our production process.

As established in Section C-2, we do not purchase, process, or sell any alloy steel GL from non-subject countries or domestic sources that could be classified as a "Like Product". All our processing activities (cutting, forming, packaging) are performed exclusively on the Subject Merchandise (alloy steel GL imported from the subject countries).

Therefore, the quantity and value of "Like Product used" is zero for all periods, and the percentage is 0%.

Table D-3.2: Subject Merchandise Used in Production Process

This table should contain the actual quantities and values of the Subject Merchandise that you process, we confirm that our accounting system tracks production input only by total value (RM) and does not record the quantity (MT) of total production input by product. We are unable to provide the Quantity (MT) for Total Production Input (B).
Therefore, we have provided the value (RM) figures for both Subject Merchandise Used (A) and Total Production Input (B). For the Quantity (MT) rows, we have entered "nil" as this information is not readily available.

Table D-3.2: Subject Merchandise Used in Production Process

Year / Quarter	Quantity (Specify unit of measurement) / Value (Specify currency)	Subject merchandise used (A)	Total production inputs (B)	Percentage (%) (A/B x 100)
Year 1 / Q1	Quantity (MT)	nil	nil	nil
	Value (MYR)	100	237	42%
Year 1 / Q2	Quantity (MT)	nil	nil	nil
	Value (MYR)	98	233	42%
Year 1 / Q3	Quantity (MT)	nil	nil	nil
	Value (MYR)	64	152	42%
Year 1 / Q4	Quantity (MT)	nil	nil	nil
	Value (MYR)	110	261	42%
Total Year 1	Quantity (MT)	nil	nil	nil
	Value (MYR)	372	883	42%
Year 2 / Q1	Quantity (MT)	nil	nil	nil
	Value (MYR)	88	216	41%
Year 2 / Q2	Quantity (MT)	nil	nil	nil
	Value (MYR)	76	187	41%
Year 2 / Q3	Quantity (MT)	nil	nil	nil
	Value (MYR)	83	204	41%
Year 2 / Q4	Quantity (MT)	nil	nil	nil
	Value (MYR)	109	267	41%
Total Year 2	Quantity (MT)	nil	nil	nil
	Value (MYR)	356	874	41%
POI / Q1	Quantity (MT)	nil	nil	nil
	Value (MYR)	92	268	34%
POI / Q2	Quantity (MT)	nil	nil	nil
	Value (MYR)	78	227	34%
POI / Q3	Quantity (MT)	nil	nil	nil
	Value (MYR)	89	259	34%
POI / Q4	Quantity (MT)	nil	nil	nil
	Value (MYR)	85	248	34%
Total POI	Quantity (MT)	nil	nil	nil
	Value (MYR)	344	1,002	34%

Question 3: Profitability of Sales

Please clarify whether the imported like product/subject merchandise been sold profitably over the past three years. Provide reason(s) and supporting evidences as necessary.

Profitability Over the Past Three Years:

Period	Net Sales (MYR)	Profit After Tax (MYR)	Net Profit Margin (%)
Year 1	XX	xx	a%
Year 2	XX	xx	b%
POI	XX	xx	c%

Year	Profitability	Explanation
Year 1	Profitable	The subject merchandise was sold marginally profitably due to raw material collapsed and fluctuated in Year 1, import costs uncertain coupled high cost in store, and inconsistent demand from downstream customers
Year 2	Profitable	The subject merchandise remained profitable despite slight increases in import costs, supported by volume sales from downstream due to stability of raw material cost internationally
POI	Profitable	The subject merchandise continued to be sold profitably, though margins have increase caused by dilution of fixed cost from new installed Pipe Mill, which improve plant utilization

Reasons For Profitability:

Reason	Explanation
1. Value-Added Processing	Our further processing activities (cutting, forming, packaging, priorities on next day delivery manner) add value to the raw material, allowing us to achieve better margins than if we sold the product without processing
2. Cost Control	We maintain effective cost control measures, including bulk purchasing, efficient processing operations, and streamlined logistics
3. Customer Relationships	Long-term relationships with direct end-users, hardware stores, stockists, and metal traders provide stable demand and repeat business
4. Diversified Customer Base	Selling to multiple customer categories (direct end users, retailers, and related companies) helps spread risk and maintain consistent sales volumes
5. Market Positioning	Our products are positioned competitively in the Malaysian market, balancing quality and price coupled with strategies location

Supporting Evidence:

We attach the following supporting documents:

· Income statements for Year 1, Year 2, and POI refer to confidential version

Question 4: Substitute Products

Please list any products that may be substituted for the subject merchandise and their end uses.

The following products may be considered substitutes for the subject merchandise (alloy steel Galvanized Steel under HS 7225):

SUBSTITUTE PRODUCTS ARE NOT "LIKE PRODUCTS" UNDER WTO RULES

4.1 What the WTO Rules Say

Under Article 2.6 of the WTO Anti-Dumping Agreement, a "like product" means a product that is identical or has characteristics closely resembling the product under investigation. This definition is interpreted narrowly.
WTO cases (EC — Asbestos, Indonesia — Autos) confirm that:

· Physical characteristics are the primary factor in deciding whether products are "like";
· Products that serve similar uses are not automatically "like products";
· "Substitutability" or "competition" in the market does not make products "like."

4.2 Substitute Products Exist — But They Are NOT "Like Products"

Even if substitute products exist, they are not "like products" for anti-dumping purposes. This is because:

Reason	Explanation
Physical characteristics differ	Alloy steel vs. non-alloy steel - a fundamental difference
WTO requires narrow interpretation	"Like product" is the narrowest definition among all WTO rules
Substitutability is irrelevant	Directly competitive products are not necessarily "like products"

4.3 Table D-3.3: Substitute Products

Substitute Product	End Uses	WTO "Like Product" Status
Non-Alloy Galvanized Steel (HS 7210)	Roofing, cladding, construction	NOT a "like product" - different base material
Aluminium-Zinc Coated Steel (Galvalume)	Roofing, building cladding	NOT a "like product" - different coating composition
Aluminium Sheets	Roofing, cladding, decorative panels	NOT a "like product" - entirely different metal
Pre-painted Steel Sheets	Building products, appliances	NOT a "like product" - different coating and appearance
Plastic/Composite Materials	Cladding, lightweight structures	NOT a "like product" - entirely different material

4.4 Simple Conclusion

Even if substitute products exist, they are not "like products" under WTO rules. The key issue is physical characteristics — alloy steel vs. non-alloy steel. Blue Scope produces non-alloy steel; we import alloy steel. They are fundamentally different, and substitutes do not change that.

Question 5: Effect of Substitute Product Prices

Indicate whether changes in the prices of substitute products have affected the selling price of the imported subject merchandise.

☐ Yes

☑ No

Explanation:

We confirm that changes in the prices of substitute products have NOT significantly affected the selling price of the imported subject merchandise.

Reasons:

Reason	Explanation
1. Different Specifications	Substitute products (e.g., non-alloy steel, aluminium, plastics) have different physical, technical, and chemical characteristics that do not meet the specific requirements of our customers
2. Customer Requirements	Our customers require the specific properties of alloy steel (strength, hardness, corrosion resistance, formability) that substitute products cannot provide
3. End-Use Specificity	Many of our customers use our processed products in applications where substitutes would be unsuitable or would compromise product quality/durability
4. Pricing Based on Cost Structure	Our selling prices are determined primarily by landed cost + processing cost + margin, not by substitute product prices
5. Limited Substitutability	While substitutes exist for some general applications, they are not direct substitutes for the specific alloy steel GL that we process and sell

We therefore confirm that substitute product prices have no material effect on the selling price of our subject merchandise.

6: Table D-3.4 – "We refer to table D-3.4 in the confidential version for transaction-by-transaction details"

7: COST ALLOCATION (TABLES D-3.5 AND D-3.6)

Table D-3.5: Total Cost of the Like Product

(Since we do not purchase, process, or sell any "Like Product," all entries are "N/A" or "0")

Description	Year 1	Year 2	POI
	Actual (A) or Average (V)	Value Per Unit (MYR/MT)	Actual (A) or Average (V)
Purchase cost	N/A	N/A	N/A
Selling, General and Administration costs (SGA)	N/A	N/A	N/A
Other costs (please specify)	N/A	N/A	N/A
Total cost	N/A	N/A	N/A

We confirm that Table D-3.5 is completed with "N/A" because we do not have any "Like Product" in our business operations.

As established in Section C-2, we do not purchase, process, or sell any alloy steel GL from non-subject countries or domestic sources that could be classified as a "Like Product". All our processing activities (cutting, forming, packaging) are performed exclusively on the Subject Merchandise (alloy steel GL imported from the subject countries).

Therefore, the total cost of the Like Product is not applicable for all periods.

D-3.6: Cost of the Subject Merchandise

(This table should be filled with the actual costs for the Subject Merchandise)

Table D-3.6 (To our best knowledge and workout for overall sales)

Descriptio	Year 1		Year 2		POI	
on	Average (V)	RM/MT	Average (V)	RM/MT	Average (V)	RM/MT
Purchase C	100	100	94	92	87	79.00
Selling, General and Administra	13	147	16	31	158	37.00
Other costs	0	0	0	0	0	0
Total cost	113	150	110	123	101	117.00

Year	Trader Sales RM	Trader MT	Distributor & Further Processor	Total gross sales
2023	100.00	100	227.00	327.00
2024	98.00	105	216.00	314.00
2025	104.00	125	199.00	303.00

Explanation of Each Row

Row	Description	How to Fill
Purchase cost	The cost of purchasing the raw alloy steel GL coils from overseas suppliers (Company C)	Enter the weighted average purchase cost per unit (MYR per MT) for each year. Use "V" for Average.
Selling, General and Administration costs (SGA)	SG&A expenses allocated to the subject merchandise	Enter the allocated SG&A cost per unit (MYR per MT) for each year. Use "V" for Average.
Other costs (please specify)	Specify the type of other cost (e.g., "Processing costs" for cutting, forming, and packaging)	Enter "Processing costs" as the description, and the cost per unit (MYR per MT) for each year. Use "V" for Average.
Total cost	Sum of all costs above	Add Purchase cost + SGA + Other costs for each year. Use "V" for Average.

7a. Justification for Using Average Cost

Our company uses the weighted average cost method for inventory valuation and cost of goods sold calculation. This is consistent with our normal accounting practices and is in accordance with Malaysian Financial Reporting Standards (MFRS).

Reason	Explanation
1. Consistency	The average cost method is consistently applied across all our products and is part of our standard accounting policy
2. Simplicity	It provides a practical and efficient way to value inventory when dealing with multiple shipments of similar products
3. Smoothing Effect	It smooths out price fluctuations between different shipments, providing a more stable cost basis
4. Compliance	The method is in accordance with MFRS and is accepted by our auditors
5. Traceability	All costs are traceable to our accounting records and can be reconciled to our audited financial statements

We confirm that the average cost method is used consistently for all subject merchandise and is reflected in our audited financial statements.

7b. Methodology for Allocating Costs

7b(i): Allocation Basis Used for Each Category of Expense

Expense Category	Allocation Basis	Description
Purchase Cost	Actual cost (weighted average)	Direct purchase cost of the subject merchandise, using weighted average cost method
Processing Costs	Actual cost	Direct cost of cutting, forming, and packaging (labour, machine operation, consumables)
Selling Expenses	Sales value	Allocated based on the proportion of sales value of the subject merchandise to total sales value
General & Administrative (G&A) Expenses	Sales value	Allocated based on the proportion of sales value of the subject merchandise to total sales value
Other Expenses	Sales value	Allocated based on the proportion of sales value of the subject merchandise to total sales value

7b(ii): Reasons for Selecting the Allocation Basis

Reason	Explanation
1. Sales Value Basis	This is the most appropriate basis as it reflects the relative revenue contribution of the subject merchandise to the overall business. It reasonably reflects the costs attributable to the product.
2. Consistency with Accounting Practices	Our company uses sales value as the allocation basis for SG&A expenses in our normal accounting practices. This is consistent with how we report expenses internally.
3. Reasonable Reflection of Costs	SG&A expenses and other expenses are generally driven by sales activity. Allocating based on sales value reasonably reflects the costs attributable to the subject merchandise.
4. Verifiability	The allocation basis is easily verifiable from our accounting records and can be reconciled to our audited financial statements.

7b(iii): Consistency with Normal Accounting Practices

We confirm that the allocation methodology described above is consistent with our company's normal accounting practices and is reflected in our audited financial statements. The same allocation basis is used for internal management reporting and external financial reporting.

SECTION E: PROFITABLITY

Table E-1.1: Profitability (Like Product)

(Since you do not have any "Like Product," all entries are "0" or "N/A")

Description	Quarter 1	Quarter 2	Quarter 3	Quarter 4	Total
	Domestic	Export	Domestic	Export	Domestic
Gross Sales	0	0	0	0	0
Less: Sales Returns & Allowances	0	0	0	0	0
Less: Sales Discounts	0	0	0	0	0
Net Sales	0	0	0	0	0
Less: Cost of Goods Sold	0	0	0	0	0
Gross Profit	0	0	0	0	0
Add: Other Income	0	0	0	0	0
Less: Selling, General and Administrative Expenses	0	0	0	0	0
Less: Financial Expenses	0	0	0	0	0
Less: Other Expenses	0	0	0	0	0
Profit Before Tax	0	0	0	0	0
Less: Tax Expense	0	0	0	0	0
Profit After Tax	0	0	0	0	0
Net Profit Margin (%)	0%	0%	0%	0%	0%

We confirm that Table E-1.1 is completed with "0" because we do not have any "Like Product" in our business operations.

As established in Section C-2, we do not purchase, process, or sell any alloy steel GL from non-subject countries or domestic sources that could be classified as a "Like Product". All our sales are of the Subject Merchandise (alloy steel GL imported from the subject countries).

Therefore, the profitability of the Like Product is zero for all periods, and the Net Profit Margin is 0% .

Table E-1.2: Profitability (Subject Merchandise) (Year 1) (Remark: only able to trace yearly)

Table E-1.2: Profitability (Subject Merchandise)

Description	Year 1 *(specify currency used)*									
	Quarter 1		Quarter 2		Quarter 3		Quarter 4		Total	
	Domestic	Export	Domestic	Export	Domestic	Export	Domestic	Export	Domestic	Export
Gross Sales	100.00		97.70		63.30		109.70		371.00	
Less:										
Sales Return	1.80		1.90		0.30		0.00		4.10	
Sales discount										
Net Sales	98.20		98.10		63.30		109.50		366.90	
Less:										
Cost of Goods Sold									xxxxxxx	
Gross Profit									xxxxxxx	
Add:										
Other income										
Less:										
Selling, General and Administrative Expenses									xxxxxxx	
Financial Expenses									xxxxxxx	
Other Expense (specify)										
Profit Before Tax									xxxxxx	
Tax Expense									xxxxxx	
Profit After Tax									xxxxxx	
Net Profit Margin (%)									xxxxxx	

able E-1.2: Profitability (Subject Merchandise) (Year 2) (only able to trace yearly)

Table E-1.2: Profitability (Subject Merchandise)

Description	Year 2 *(specify currency used)*									
	Quarter 1		Quarter 2		Quarter 3		Quarter 4		Total	
	Domestic	Export	Domestic	Export	Domestic	Export	Domestic	Export	Domestic	Export
Gross Sales	100.00		86.20		94.60		123.30		404.10	
Less:										
Sales Return										
Sales discount										
Net Sales	100.00		86.20		94.60		123.30		404.10	
Less:										
Cost of Goods Sold									xxxxx	
Gross Profit									xxxxx	
Add:										
Other income										
Less:										
Selling, General and Administrative Expenses									xxxxx	
Financial Expenses									xxxxx	
Other Expense (specify)										
Profit Before Tax									xxxxx	
Tax Expense									xxxxx	
Profit After Tax									xxxxx	
Net Profit Margin (%)									xxxxx	

Table E-1.2: Profitability (Subject Merchandise) (POI)

Table E-1.2: Profitability (Subject Merchandise)

Description	POI *(specify currency used)*									
	Quarter 1		Quarter 2		Quarter 3		Quarter 4		Total	
	Domestic	Export	Domestic	Export	Domestic	Export	Domestic	Export	Domestic	Export
Gross Sales	100.00		84.50		96.70		93.00		374.10	
Less:										
Sales Return			0.00		0.03		0.03		0.00	
Sales discount										
Net Sales	100.00		84.40		96.30		93.00		373.30	
Less:										
Cost of Goods Sold									xxxxx	
Gross Profit									xxxxx	
Add:										
Other income										
Less:										
Selling, General and Administrative Expenses									xxxxx	
Financial Expenses									xxxxx	
Other Expense (specify)										
Profit Before Tax									xxxxx	
Tax Expense									xxxxx	
Profit After Tax									xxxxx	
Net Profit Margin (%)									xxxxx	

We wish to clarify that our company's accounting system records profitability data (including Gross Sales, Sales Returns, Sales Discounts, Cost of Goods Sold, selling, General and Administration Expenses, and Financial Expenses) only on a yearly basis.

Our accounting system does not track or allocate costs and revenues to individual quarters. The annual financial statement are prepared on a yearly basis, and the supporting ledgers do not provide a reliable breakdown by quarter for the specific cost categories required in this table.

QUESTION 2: PROFIT MARGINS FOR ALL TRANSACTIONS

Provide the company's profit margins for Year 1, Year 2 and POI for all transactions involving the purchase of the like product/subject merchandise from exporter/producer.
Profit Margins for Subject Merchandise Purchase, therefore, with table E-1.2 above, we sum up the yearly profitability table as below:

Period	Net Sales (MYR)	Profit After Tax (MYR)	Net Profit Margin (%)
Year 1	XX	xx	a%
Year 2	XX	xx	b%
POI	xx	xx	c%

We have also provided quarterly breakdowns in Table E-1.2 above but not in full quarter.

QUESTION 3: COMPARISON TO NORMAL OPERATING PROFIT MARGIN

Indicate whether the operating profit margin of the like product/subject merchandise is less than, the same as, or greater than your company's normal operating profit margin for Year 1, Year 2, and POI.

Comparison of Subject Merchandise Profit Margin vs. Normal Company Profit Margin:

Period	Subject Merchandise Profit Margin (%)	Normal Company Profit Margin (%) (Overall)	Comparison
Year 1	a%	A%	Less than
Year 2	b%	B%	Less than
POI	c%	C%	Less than

We indicate that the operating profit margin of the subject merchandise is less than our company's normal operating profit margin for all periods but is important for overall company plant utilization and total operation efficiency effectiveness.

Our normal company profit margin (all products) for Year 1, Year 2, and POI is as follows:

Period	Normal Company Profit Margin (%)
Year 1	A%
Year 2	B%
POI	C%

QUESTION 4: EXPLANATION OF VARIANCE (IF LESS THAN NORMAL)

Provide a detailed explanation of the factors and reasons contributing to this variance if the profit margin of the like product/subject merchandise is less than the normal operating profit margin in any of the specified periods.

Explanation of Variance in Profit Margins:

The profit margin of the subject merchandise is less than our company's normal operating profit margin for Year 1, Year 2, and POI due to the following factors:

Factor	Explanation
1. Higher Raw Material Costs	The cost of importing alloy steel GL from subject countries has fluctuated significantly during the period under review due to global steel price volatility
2. Increased Freight and Logistics Costs	Ocean freight costs have increased substantially due to global shipping disruptions and fuel price increases
3. Import Duties and Taxes	We bear the full cost of import duties and taxes, which are not fully recoverable from customers due to competitive market conditions
4. Intense Market Competition	The Malaysian steel market is highly competitive, with multiple suppliers offering similar products. This limits our ability to pass on cost increases to customers
5. Processing Costs	Our further processing activities (cutting, forming, packaging) add costs that are not fully reflected in selling prices due to market constraints
6. Exchange Rate Fluctuations	Fluctuations in the USD/MYR exchange rate have affected our landed costs, reducing profit margins
7. Customer Price Sensitivity	Direct end-users, hardware stores, and stockists are highly price-sensitive, making it difficult to increase prices to maintain margins

Variance Summary:

Year	Subject Merchandise Margin	Normal Company Margin (overall)	Variance (Percentage Points)
Year 1	a%	A%	>aA%
Year 2	b%	B%	>bB%
POI	c%	C%	>cC%

Supporting Evidence:

We attach the following supporting documents:

· Income statements for Year 1, Year 2, and POI refer to confidential version

E-2 FURTHER PROCESSOR

Question 1: Complete Table E-2.1

Complete the Table E-2.1 for your sales transactions of all product sold (like product and subject merchandise). For this purpose, use Excel format as per Table E-2.1. If it is not possible to attribute the profitability directly to the subject merchandise and like product, apportionment should be made. Explain the basis of the apportionment.

Important Note on Export Columns. Since you have no export sales, all export columns should be filled with "0". All your sales are domestic.

Table E-2.1 (Year 1) (Same at table E-1.2 as only Subject Merchandise)

Table E-2.1: Profitability (Subject Merchandise) (Year 1) (Remark: only able to trace yearly)

Table E-2.1: Profitability (Subject Merchandise)

Description	Year 1 *(specify currency used)*									
	Quarter 1		Quarter 2		Quarter 3		Quarter 4		Total	
	Domestic	Export	Domestic	Export	Domestic	Export	Domestic	Export	Domestic	Export
Gross Sales	100.00		97.70		63.30		109.70		371.00	
Less:										
Sales Return	1.80		1.90		0.30		0.00		4.10	
Sales discount										
Net Sales	98.20		98.10		63.30		109.50		366.90	
Less:										
Cost of Goods Sold									xxxxxxx	
Gross Profit									xxxxxxx	
Add:										
Other income										
Less:										
Selling, General and Administrative Expenses									xxxxxxx	
Financial Expenses									xxxxxxx	
Other Expense (specify)										
Profit Before Tax									xxxxxx	
Tax Expense									xxxxxx	
Profit After Tax									xxxxxx	
Net Profit Margin (%)									xxxxxx	

Completed Table E-2.1 (Year 2) (Sama as table E-1.2)

Table E-2.1: Profitability (Subject Merchandise) (Year 2) (Remark: only able to trace yearly)

Table E-2.1: Profitability (Subject Merchandise)

Description	Year 2 *(specify currency used)*									
	Quarter 1		Quarter 2		Quarter 3		Quarter 4		Total	
	Domestic	Export	Domestic	Export	Domestic	Export	Domestic	Export	Domestic	Export
Gross Sales	100.00		86.20		94.60		123.30		404.10	
Less:										
Sales Return										
Sales discount										
Net Sales	100.00		86.20		94.60		123.30		404.10	
Less:										
Cost of Goods Sold									xxxxx	
Gross Profit									xxxxx	
Add:										
Other income										
Less:										
Selling, General and Administrative Expenses									xxxxx	
Financial Expenses									xxxxx	
Other Expense (specify)										
Profit Before Tax									xxxxx	
Tax Expense									xxxxx	
Profit After Tax									xxxxx	
Net Profit Margin (%)									xxxxx	

Completed Table E-2.1 (POI) (Same as table E-1.2)

Table E-2.1: Profitability (Subject Merchandise) (POI) (Remark: only able to trace yearly)

Table E-2.1: Profitability (Subject Merchandise)

Description	POI *(specify currency used)*									
	Quarter 1		Quarter 2		Quarter 3		Quarter 4		Total	
	Domestic	Export	Domestic	Export	Domestic	Export	Domestic	Export	Domestic	Export
Gross Sales	100.00		84.50		96.70		93.00		374.10	
Less:										
Sales Return			0.00		0.03		0.03		0.00	
Sales discount										
Net Sales	100.00		84.40		96.30		93.00		373.30	
Less:										
Cost of Goods Sold									xxxxx	
Gross Profit									xxxxx	
Add:										
Other income										
Less:										
Selling, General and Administrative Expenses									xxxxx	
Financial Expenses									xxxxx	
Other Expense (specify)										
Profit Before Tax									xxxxx	
Tax Expense									xxxxx	
Profit After Tax									xxxxx	
Net Profit Margin (%)									xxxxx	

Apportionment Basis:

Our company sells only one product category — processed alloy steel GL & PPGL (subject merchandise). We do not sell any other products that require separate apportionment.

Therefore, the profitability figures in Table E-2.1 represent 100% of our sales and are directly attributable to the subject merchandise.

Basis of Allocation:

Cost Category Allocation Basis

Cost of Goods Sold Actual cost traced to subject merchandise (weighted average method)

Selling, General & Administrative Expenses Allocated based on sales value proportion (all sales are subject merchandise)

Financial Expenses Allocated based on sales value proportion (all sales are subject merchandise)

Tax Expense Actual tax paid (24% corporate tax)

Since all our sales are of the subject merchandise, the apportionment is 100% allocation to the subject merchandise.

SECTION F: PUBLIC INTEREST

SECTION F: PUBLIC INTEREST

F-1 MALAYSIAN MARKET

Please provide a general outline of the like product and subject merchandise in the Malaysian market including any segmentation (e.g., brand name vs. generic, geographic divisions), historical and expected demand patterns, changes in consumer taste, distribution channels and seasonal fluctuations. You may also wish to comment on other factors affecting the Malaysian industry such as supply and demand, prices, the relative importance of imports, etc.

1. Overview of the Malaysian Market

The Malaysian market for flat-rolled steel products, including alloy Galvanized Steel (GL) under HS 7225, is a competitive and dynamic market serving various downstream industries including construction, industry, and manufacturing.

2. Market Segmentation

Segment	Description
Branded Products	Products sold under established brands (e.g., Blue Scope's COLORBOND®, ZINCALUME®) - typically commanding premium prices
Generic/Non-Branded Products	Imported products sold without brand names - generally more price-competitive
Geographic Divisions	Demand is concentrated in industrial and urban areas (Klang Valley, Penang, Johor) with construction and manufacturing activities

3. Historical and Expected Demand Patterns

Period	Demand Pattern
Historical	Demand for GL has grown steadily over the past 5 years, driven by infrastructure development and construction projects
Current	Demand remains stable but is affected by global economic conditions and domestic construction activity
Expected	Demand is expected to continue growing, supported by government infrastructure spending and industrial development

4. Distribution Channels

Channel	Description
Direct Sales	Importers selling directly to end-users (manufacturers, construction companies)
Distributors/Stockists	Wholesalers supplying hardware stores, building material stockists, and metal traders
Retail	Hardware stores and building material suppliers serving smaller contractors and DIY consumers

5. Other Factors Affecting the Malaysian Industry

Factor	Impact
Supply and Demand	Domestic production capacity is insufficient to meet total national demand, making imports essential
Prices	Global steel prices and freight costs directly affect landed costs and selling prices
Import Reliance	Imports play a critical role in filling the supply gap left by domestic producers

F-2 MATERIAL INJURY

Please comment on each specific claim made by the Petitioner with regards to material injury
1. Petitioner's Claim: The domestic industry is suffering material injury due to dumped imports

Our Comment:

We respectfully submit that the Petitioner's claim of material injury is not substantiated and fails to establish a causal link between imports and any alleged injury for the following reasons:

Petitioner's Claim	Our Response
Claim 1: Increased imports have caused price depression	The Petitioner (NS Bluescope) produces non-alloy steel (HS 7210/7212), while our imports are alloy steel (HS 7225). These are different products. Price depression in non-alloy steel cannot be attributed to alloy steel imports.
Claim 2: The domestic industry has lost sales	NS Bluescope does not produce alloy steel GL. Therefore, they cannot claim lost sales from imports of products they do not manufacture. Any lost sales are more likely due to their own inefficiencies or inability to meet customer specifications.
Claim 3: Imports are undercutting domestic prices	Since NS Bluescope produces non-alloy steel and we import alloy steel, there is no price undercutting of like products. The products are not alike.
Claim 4: Domestic production capacity has declined	Any decline in NS Bluescope's production capacity is more likely due to their own operational decisions, high production costs, or market strategy - not imports of alloy steel.

2. Supporting Evidence

We rely on the following evidence:

· NS Bluescope's 2020 petition covered only non-alloy steel (HS 7210/7212) — confirming they do not produce alloy steel
· Our products are classified under HS 7225 (alloy steel), which is distinct from Blue Scope's production

F-3 CAUSAL LINK

Please provide details of any other factors you consider to be the cause of the injury claimed by the Petitioner.

1. Other Factors Contributing to Any Alleged Injury

We respectfully submit that any injury experienced by the Petitioner is not caused by imports of alloy steel GL, but rather by the following factors:

Factor	Explanation
1. Global Steel Price Volatility	Steel prices have fluctuated significantly due to global supply chain disruptions, raw material costs, and economic conditions
2. High Production Costs	Blue Scope's production costs (energy, labour, raw materials) may be higher than competitors, reducing their competitiveness
3. Operational Inefficiencies	Internal operational inefficiencies or outdated technology may affect Blue Scope's cost structure
4. Changes in Demand	Demand for construction materials may have decreased due to economic factors, affecting all suppliers
5. Competition from Other Domestic Producers	Competition within the domestic market (not just imports) may be affecting Blue Scope's sales
6. Customer Preferences	Customers may prefer imported products due to better specifications, quality, or pricing - independent of dumping
7. Currency Fluctuations	Exchange rate movements affect the competitiveness of both imports and domestic products
8. NS Bluescope's Inability to Meet Demand	If NS Bluescope cannot supply the specific alloy steel products required by customers, imports are necessary to fill the gap

2. Causal Link Conclusion

We submit that there is no causal link between our imports and any injury claimed by Blue Scope because:

· Blue Scope produces non-alloy steel, not alloy steel
· Our imports are alloy steel (HS 7225) — a different product

· Blue Scope cannot claim injury from products they do not manufacture

· Any injury is more likely caused by the factors listed above

F-4 PRICE COMPARISON

Indicate the differences between the price of the like product and subject merchandise and explain if the prices affect your profit margin and business operation in general.

1. Price Comparison: Subject Merchandise vs. Like Product

Aspect	Subject Merchandise (Our Imports)	Like Product (Blue Scope)
Product Type	Alloy steel GL (HS 7225)	Non-alloy steel (HS 7210/7212)
Price Structure	Cost-plus (landed cost + processing cost + margin)	Market-based (domestic pricing)
Price Level	Higher (due to alloying elements and value-added processing)	Lower (non-alloy, no alloying elements)

2. Explanation

Since Blue Scope produces non-alloy steel and we import alloy steel, there is no direct price comparison of like products. The products are physically and chemically distinct, and therefore their prices are not directly comparable.

3. Effect on Profit Margin and Business Operations

Effect	Explanation
Profit Margin	Our profit margins are determined by landed cost + processing cost + market pricing. Substitute product prices do not affect our margins because customers require the specific properties of alloy steel.
Business Operations	Our business relies on the availability of imported alloy steel GL. If corrective measures are taken, our operations would be severely disrupted as there is no adequate domestic supply of alloy steel GL.

4. Conclusion

We confirm that price differences between substitute products and our subject merchandise do not affect our profit margin or business operations because:

· They are not "like products"
· They serve different customer requirements
· Customers require the specific properties of alloy steel

F-5 EFFECT OF CONTINUED IMPORTS

What would happen to your business and the market in general if corrective measures are taken on the imports of subject merchandise? Explain the reasons for your views.

1. Effect on Our Business

If corrective measures (e.g., anti-dumping duties) are imposed on the imports of subject merchandise, the following effects would occur:

Effect	Explanation
1. Business Closure	We would be unable to compete with higher prices and may be forced to cease operations
2. Job Losses	Our employees would lose their jobs, contributing to unemployment in Malaysia
3. Loss of Downstream Customers	Our customers (construction companies, manufacturers, hardware stores) would lose a reliable supply of processed alloy steel products
4. Inability to Fulfill Contracts	We would be unable to fulfill existing contracts with customers, leading to financial penalties and reputational damage
5. Loss of SME Viability	As an SME, we would not survive the cost increase, unlike larger competitors

2. Effect on the Malaysian Market

Effect	Explanation
1. Supply Shortage	Domestic production of alloy steel GL is insufficient to meet market demand. Imports are essential to fill this gap
2. Price Increases	Reduced supply would lead to higher prices for all consumers, contributing to inflation
3. Monopoly Creation	Blue Scope would gain a near-monopoly position, enabling them to raise prices arbitrarily
4. Downstream Industry Impact	Manufacturers relying on alloy steel GL would face higher costs, reducing their competitiveness against regional rivals (Thailand, Vietnam, China)
5. Consumer Impact	End consumers would face higher prices for construction materials, automotive parts, and appliances
6. Reduced Investment	Uncertainty in the market would deter investment in downstream industries

3. Summary of Impacts

Stakeholder	Impact
Our Company	Business closure, job losses, inability to serve customers
Our Customers	Loss of reliable supply, higher prices
Malaysian Economy	Reduced competitiveness, higher inflation, job losses
Consumers	Higher prices for construction materials and manufactured goods
Market Competition	Reduced competition, near-monopoly for Blue Scope

4. Conclusion

We urge MITI to consider the broader public interest implications of this investigation. Imposing duties on alloy steel GL imports would:

· Destroy SME businesses and jobs
· Create a monopoly for NS Bluescope
· Increase costs for downstream industries and consumers
· Harm Malaysia's competitiveness in the region

We respectfully request that MITI apply Section 4(3)(c) of the Anti-Dumping Duties Act 1993 and reject this petition if it is not in the public interest.

SECTION G: GENERAL COMMENTS

SECTION G: GENERAL COMMENTS

Question 1: Acceptable Sources for International Price and Market Condition Information

In your opinion, what are the acceptable sources that provide information on international price and market condition of the like product and subject merchandise? Why do you consider this source as acceptable? Please provide evidence.

1. Acceptable Sources of International Price and Market Information

We consider the following sources to be credible and acceptable for establishing international prices and market conditions for alloy steel GL (HS 7225):

Source	Reason for Acceptability
1. International Steel Price Indices	Published by independent, globally recognized organizations using standardized methodologies (e.g., S&P Global Platts, MEPS International, CRU Steel Market Monitor)
2. Customs Import Data	Official import declaration data from Royal Malaysian Customs Department and exporting countries' customs authorities. This data is verifiable and authoritative
3. MITI's TRIMA System	Official government platform for trade remedy investigations
4. WTO Trade Statistics	Official data from the World Trade Organization
5. Industry Association Reports	Reports from recognized steel industry associations (World Steel Association, SEAISI, MISIF)

2. Why These Sources Are Acceptable

We consider these sources acceptable because they are:

· Independent and Unbiased — Not controlled by any party to the investigation
· Verifiable — Data can be cross-checked against multiple sources
· Publicly Available — Accessible to all interested parties
· Consistent with Industry Practice — Commonly used in anti-dumping investigations
· Official Government Sources — Customs data and MITI publications are authoritative and reliable

3. WTO Transparency Obligations

We note that Malaysia, as a WTO member, is obligated to act in conformity with the WTO Anti-Dumping Agreement. This includes ensuring that determinations are based on verifiable and transparent information. The use of independently verifiable sources is consistent with these obligations.

Question 2: Malaysian Standard for the Subject Merchandise

Is there any Malaysian Standard for the subject merchandise? Which international standard is the Malaysian Standard comparable with? What is the international/accepted standard for the subject merchandise? Does the subject merchandise imported by your company comply with any Standard? If so, state which Standard.

1. Malaysian Standards for Galvanized Steel

Standard	Description
MS 1125: Part 1-10	Galvanized steel sheet and strip â€" Specifications
MS ISO 3575	Continuous hot-dip zinc-coated carbon steel sheet

2. Comparable International Standards

The Malaysian Standard is comparable with the following international standards:

International Standard	Description
ISO 3575	Continuous hot-dip zinc-coated carbon steel sheet
JIS G3302	Hot-dip zinc-coated steel sheet and strip
ASTM A653/A653M	Steel Sheet, Zinc-Coated (Galvanized)
EN 10346	Continuously hot-dip coated steel flat products

3. Standards Compliance of Our Imports

Our imported alloy steel GL complies with JIS G3302 and provides the required certifications to our customers.

4. HS Code Limitation

We draw the Ministry's attention to the fact that the Harmonised System Code and ASEAN Harmonised Tariff Nomenclature stated in the Notice of Initiation are provided only for information and have no binding effect on the classification of the subject merchandise. This reinforces our position that the investigation should be based on product characteristics, not merely HS code classification.

Question 3: Customer Determination of Producer(s) and Agreement Requirements

Does your customer determine the producer(s) of the subject merchandise? What is the form of agreement and requirements for the subject merchandise given to the producer(s)? Is there any forecasted order, minimum order quantity (MOQ), price and appointment/certification given to the supplier(s)/source(s) of the subject merchandise?

1. Does Your Customer Determine the Producer(s) of the Subject Merchandise?

Scenario	Answer	Explanation
Direct End Users	Generally NO	Most customers specify product specifications (grade, thickness, coating), not producer
Hardware Stores/Stockists/Traders	NO	They purchase based on product specifications, not producer identity
Related Companies	NO	Related company purchases are based on specifications, not producer selection

2. Form of Agreement and Requirements

Aspect	Detail
Agreement Form	Individual Purchase Contract for each transaction
Product Specifications	Grade, thickness, width, coating weight, spangle type, surface finish
Quantity	Quantity ordered (in MT/ RM/Ft)
Price	Price per unit (FOB or CIF basis)
Payment Terms	L/C or T/T
Quality Requirements	Mill test certificates, compliance with JIS G3302

3. Forecasted Orders, MOQ, and Certification

Aspect	Detail
Forecasted Orders	NO - Orders are placed on a transaction-by-transaction basis
Minimum Order Quantity (MOQ)	No mentioned
Appointment/Certification	NO - No appointments or certifications are provided to suppliers

4. Customer Does Not Determine Producer
This demonstrates that customers do not dictate the source of supply and that we operate in a competitive market where purchasers are primarily concerned with product quality and specifications, not the identity of the producer.

KEY ARGUMENTS TO STRENGTHEN THE REBUTTAL

Argument 1: The "Like Product" Definition is Narrow

Under Article 2.6 of the WTO Anti-Dumping Agreement, a "like product" is defined as a product which is "identical, i.e. alike in all respects to the product under consideration," or in the absence of such a product, another product which has "characteristics closely resembling" those of the product under consideration.

WTO jurisprudence (EC — Asbestos, Indonesia — Autos) confirms that:

· Physical characteristics are the primary criterion in the "like product" analysis
· The "like product" definition is the narrowest among all WTO rules
· Directly competitive or substitutable products are not necessarily "like products"

Application to the Case:

Argument	Evidence
NS Bluescope produces non-alloy steel	2020 petition covered HS 7210/7212 only; product portfolio uses low-carbon steel
Your imports are alloy steel (HS 7225)	Your base material contains alloying elements (Cr, Mn, B, etc.)
Same coating ≠ same product	HS classification is based on base material, not coating
No "like product" exists	Different base material = different chemical composition = not "alike in all respects"

Argument 2: The Petitioner Cannot Claim Injury from Products They Do Not Produce

The Petitioner (NS Bluescope Malaysia) produces non-alloy steel products under HS 7210/7212, as evidenced by:

· Their 2020 petition explicitly covered non-alloy steel products under HS 7210 and 7212, not HS 7225
· Their product portfolio (COLORBOND®, ZINCALUME®, TRUECORE®) uses low-carbon steel as the base material
· Their production process intentionally uses low-carbon steel to achieve required structural properties without alloy additions

Since the Petitioner does not manufacture alloy steel GL, they cannot claim injury from imports of a product they do not produce.

Argument 3: Public Interest Considerations

Section 11(1)(e) of the Countervailing and Anti-Dumping Duties Act 1993 provides that an investigation may be terminated at any time if "the Government determines that termination of the investigation is in the public interest".

The public interest includes consideration of:

· Reliance on imported goods
· Consumer prices
· Supply of goods
· Effects on downstream industries
· Inflation

Application to the Case:

Public Interest Factor	Impact
Downstream Industries	ADD would increase raw material costs for manufacturers and construction companies
Consumer Prices	Higher steel costs would be passed on to consumers, contributing to inflation
Supply of Goods	Domestic production cannot meet total demand; imports are essential
SME Employment	Your business and similar SMEs would be forced to close, causing job losses
Monopoly Creation	Blue Scope would gain a near-monopoly position, enabling price increases

The 2025 amendment to Act 504 expressly states that the purpose is to "protect local manufacturers who own factories or conduct value-added activities within the country". Your company conducts value-added activities (cutting, forming, packaging, servicing) and should not be disadvantaged by a petition that seeks to protect a product that the Petitioner does not even produce.

Argument 4: WTO Transparency and Procedural Fairness

Malaysia's WTO obligations require that investigating authorities provide sufficient explanation of their determinations. The Federal Court is currently considering whether the government must explain how it calculates anti-dumping duties.

We respectfully submit that:

· The Petitioner's claims of injury are unsubstantiated because they are based on a product (alloy steel) that the Petitioner does not produce
· The "like product" determination must be based on physical characteristics, not merely HS code classification
· The investigation should be terminated or HS 7225 should be excluded from the scope on public interest grounds

SUMMARY OF KEY REBUTTAL POINTS

Petitioner's Claim	Our Rebuttal
Imports have increased	Even if true, the imports are of alloy steel, which NS Bluescope does not produce
Domestic industry is injured	NS Bluescope cannot claim injury from imports of products they do not manufacture
Price undercutting	No price undercutting of "like products" because the products are not "like"
Market share loss	Any market share loss is due to NS Bluescope's own inability to supply alloy steel
Injury causation	Any injury is caused by global price volatility, high production costs, or other factors - not imports of alloy steel

CONCLUSION

We respectfully submit that:

1. No "like product" exists — NS Bluescope produces non-alloy steel, not alloy steel
2. NS Bluescope cannot claim injury from imports of products they do not produce
3. Public interest demands rejection of this petition — downstream industries, consumers, and SMEs would be harmed
4. WTO obligations require fairness — Malaysia must uphold the "like product" definition and transparency requirements

We urge MITI to:
· Exclude HS 7225 & HS 7226 from the scope of this investigation
· Reject the petition on public interest grounds
· Terminate the investigation if no "like product" exists