**NON CONFIDENTIAL**

**AD/EXP/2026/01**

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

**Foreign producers and exporters submitting must ensure that:**

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

**FOREIGN PRODUCER/EXPORTER:**
**[SHANDONG LONGCHENG EXPORTING CO., LTD.**
**And**
**SHANDONG JIALONG NEW MATERIAL CO., LTD.]**

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

**NON CONFIDENTIAL**

**AD/EXP/2026/01**

# MINISTRY OF INVESTMENT, TRADE AND INDUSTRY MALAYSIA

## INTRODUCTION

FOREIGN PRODUCER/EXPORTER : **[SHANDONG LONGCHENG EXPORTING CO., LTD. and SHANDONG JIALONG NEW MATERIAL CO., LTD.]**

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

H.S. CODES / AHTN : **7210.61.11 00, 7210.61.12 00, 7210.61.91 00, 7210.61.92 00, 7210.61.99 00, 7212.50.23 00, 7212.50.24 00, 7212.50.29 00, 7225.92.90 00, 7225.99.90 00, 7226.99.19 00 and 7226.99.99 00.**

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

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

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

For the purpose of this submission:

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

STATUTORY REFERENCE:

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

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# PREAMBLE

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

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

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

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

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

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

# GENERAL INSTRUCTIONS

## A. Guidelines to Complete the Questionnaire

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## B. Time Limits and Non-Cooperation

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

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

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

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

## C. Submission of questionnaire responses via TRIMA system

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

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

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

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

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

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

## D. How to Complete the Non-Confidential Version

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

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

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

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

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

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

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

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

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

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

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

**Formula:**

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

Example of confidential information:

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

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

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

The non-confidential summary (indexed):

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

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

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

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

Example of confidential version:

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

The non-confidential summary (redacted):

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

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

Example of confidential version:

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

The non-confidential summary (functional redaction):

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

# CHECKLIST

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

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

# MINISTRY OF INVESTMENT, TRADE AND INDUSTRY MALAYSIA

## DECLARATION

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

I hereby declare that _____ (company) does manufacture/export the subject merchandise and have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

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

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

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

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

Signature : _____

Name : _____

Designation : _____

Date : _____

Company stamp

# MINISTRY OF INVESTMENT, TRADE AND INDUSTRY MALAYSIA

## DECLARATION

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

I hereby declare that _____ (company) does not manufacture/export the subject merchandise and therefore have not completed the attached questionnaire.

Signature : _____

Name : _____

Designation : _____

Date : _____

Company stamp

Before me,

Seal

_____

Notary Public / Commissioner for Oaths

# SECTION A: COMPANY STRUCTURE AND OPERATIONS

## A-1 Contact Information

Company

Name: **Shandong Longcheng Exporting Co., Ltd.**

Address: **DIANZI INDUSTRIAL ZONE, BOXING COUNTY, BINZHOU CITY,SHANDONG PROVINCE, CHINA**

Telephone: **86 0543-2966555**

Email: **sdjialong2022@163.com**

Web page: **NA**

Factory

Name: **SHANDONG JIALONG NEW MATERIAL CO., LTD.**

Address: **DIANZI INDUSTRIAL ZONE, BOXING COUNTY, BINZHOU CITY,SHANDONG PROVINCE, CHINA**

Telephone: **86 0543-296607**1

Email: **ella@jlsteelgroup.com**

Contact person

Name: **Ella Zhao**

Position/Designation: **Sales Manager**

Address: **DIANZI INDUSTRIAL ZONE, BOXING COUNTY, BINZHOU CITY,SHANDONG PROVINCE, CHINA**

Telephone: **86 0543-2966555**

Email: **ella@jlsteelgroup.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 | : **RayYin & Partners** |
| Name of legal representative/consultant | : **Tao Wang, Tong Mu, Lei Zhou** |
| Name of contact person | : **Lei Zhou** |

Address : **Room 2370, 23rd Floor, Sunflower Tower, No. 37 Maizidian Street, Chaoyang District, Beijing 100125, P.R. China**

Telephone : **86 10 84683690**

Email : **zhoulei@rayyinlawyer.com**

## A-3 Corporate Information (including related parties)

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

**ANSWER:**
**Shandong Longcheng Exporting Co., Ltd. ("Longcheng" or "the Company") is the registered name. Longcheng's form of business organisation id company.**
**Longcheng does not trade in a name other than its registered name.**

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 |
|---|---|---|
| | | |
| | | |

**ANSWER:**
**Please refer to Table A-3.1: Shareholdings.**
**Structural diagram is attached as Exhibit A-3.2 Structural diagram.**

3. Please provide:

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

**ANSWER:**
**Please refer to Exhibit A-3.2 Structural diagram.**

**Jialong Group business operation explanation in 2025:**
**As can been from the Exhibit A-3.2. There are five companies in the group.**

**[CONFIDENTIAL]**

**Public summary:**

**Information concealed above is the affiliation structure and business relationship, which are confidential information.**

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

**ANSWER:**
**Please refer to Exhibit A-3.3.b Internal Departments Diagram.**

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

**ANSWER:**
**Please refer to Exhibit A-3.3.b Internal Departments Diagram.**
**Longcheng is a trading company and does not have production, R&D departments.**

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

**ANSWER:**
**Please refer to Exhibit A-3.3.d Article of Association.**
**The Company does not have memorandum of association, business registration or business operation license.**

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

**ANSWER:**
**Please refer to Exhibit A-3.3.e Brochure.**

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

**ANSWER:**
**Not applicable, the subject merchandise exported into Malaysia were not manufactured in another country.**

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

**ANSWER:**
**The Tax Identification Number is shown on the business license. Please see Exhibit A-3.3.g Business License.**
**The Company does not have Transfer Pricing Documentation submitted to authority.**

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

Table A-3.2: Listing of Related Companies

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

**ANSWER:**
**Please refer to Table A-3.2: Listing of Related Companies.**

5. If your company has contractual links/agreement with other company(ies) in Malaysia or other countries (in particular, alleged country(ies) in this proceeding), for the production (e.g., subcontracting), supply and sale of the product or other licensing, technical patent or compensatory agreements, explain the nature of the agreement and indicate clearly the country where the company is located.

**ANSWER:**
**Not applicable, the Company does not have contractual links or agreement with other company(ies) in Malaysia or other countries.**

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

**ANSWER:**
**Not applicable. The company has no other commercial relationships with the alleged country(ies) under this investigation.**

# SECTION B: PRODUCT DESCRIPTION

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

**Like Product**

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

**Subject Merchandise**

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

## B-1 Product Specifications

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

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

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

Note:

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

**ANSWER:**
**Please refer to Table B-1.1: Product Range Produced (Actual Production).**

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

**ANSWER:**

**Please refer to Exhibit B-1.2 Production Process.**
**Please note that Longcheng does not possess any production lines, while Shandong Jialong New Material Co., Ltd. ("Jialong") owns the production lines of galvalume products.**
**For goods exported by Longcheng to Malaysia in 2025, Longcheng purchased raw materials and entrusted Jialong to manufacture them into galvalume products, paying manufacturing fees to Jialong.**
**The production process is provided by Jialong.**

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

Table B-1.2: Product Range Produced

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

**ANSWER:**
**Please refer to Table B-1.2: Product Range Produced.**

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

**ANSWER:**
**No such documentation is available. Please refer to the product manual attached as Exhibit A-3.3.e Brochure for relevant technical details.**

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

**ANSWER:**
**Not applicable, the Company does not have product coding system and it uses the width plus thickness to classify products.**

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

Table B-1.3: Product Comparability

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

| *(Include description)* | | | | | |
|---|---|---|---|---|---|
| | | | | | |
| | | | | | |
| | | | | | |

**ANSWER:**
**Please refer to Table B-1.3: Product Comparability.**

## B-2 Comparison of Export and Domestic Products

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

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

Table B-2: Products Comparison

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

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

**ANSWER:**
**Please refer to Table B-2: Products Comparison.**

## B-3 Format of Submission

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

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

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

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

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

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

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

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

**ANSWER:**
**Please refer to Table B-3: Product Specification (PDT-SPEC).**

# SECTION C: OPERATION

## C-1 Production and Capacity

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

Table C-1: Production and Capacity Utilisation

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

**ANSWER:**
**Please refer to Table C-1: Production and Capacity Utilisation provided by Jialong.**

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

**ANSWER:**
**Jialong had 2 production lines for galvalume steel products during the investigation period. Based on the technical document of the galvalume coil production line, the maximum speed of 220m/min in the process**

**section and the benchmark specification of 0.35mm*1000mm of the production line are selected.**

**The maximum production per hour is calculated as follows:**
**Thickness * Width * Line velocity (m/min) * Density of iron 7.85 g/cm3 * 60 minutes / 1,000,000**

**The nominal capacity is calculated as follows:**
**Maximum production capacity per hour * Normal days per year * Working hours per day**

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

**ANSWER:**
**Jialong does not produce other products on the same production equipment and machinery used for the production of product.**

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

**ANSWER:**
**Not applicable, Jialong does not have future plans to commence production or increase capacity in the exporting country, in Malaysia or in third countries.**

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

**ANSWER:**
**The average scrap/waste ratio resulting from the production process is less than 1%.**

## C-2 Inventories

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

Table C-2: Inventories

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

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

** Captive use = internal consumption*

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

**ANSWER:**
**Please refer to Table C-2: Inventories.**

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

**ANSWER:**

**The captive use refers to using the galvalume steel products to manufacture pre-painted steel products.**
**Other movements include alu- zinc slitting and scrap iron goods receipt.**

## C-3 Employment

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

Table C-3: Employment

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

**ANSWER:**
**Please refer to Table C-3: Employment.**

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

**ANSWER:**
**Not applicable, the Company does not make allocation.**

3. Explain if:

a. workers have been temporarily out of work; or

b. your company had to introduce reduced working hours.

**ANSWER:**
**Not applicable, the above two situations do not exist.**

## C-4 Investments

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

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

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

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

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

| | | | | | |
|---|---|---|---|---|---|
| • Other *(specify)* | | | | | |
| Non-Capital:<br>• R&D<br>• Other *(specify)* | | | | | |

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

**ANSWER:**
**Not applicable, there are no new investments or replacement.**

## C-5 Sales Reconciliation

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

**ANSWER:**
**Please refer to Table C-5: Sales Reconciliation for the All Products.**

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

Table C-5: Sales Reconciliation for the All Products

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

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

## C-6 Sales Turnover

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

Table C-6: Turnover

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

| | | | | | |
|---|---|---|---|---|---|
| | Q2 | | | | |
| | Q3 | | | | |
| | Q4 | | | | |
| Total | | | | | |

**ANSWER:**
**Please refer to Table C-6: Turnover.**

## C-7 Sales Volume and Value

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

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

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

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

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

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

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

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

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

**ANSWER:**
**Please refer to Table C-7.1: Sales of the Like Product and Subject Merchandise (Unrelated) and Table C-7.2: Sales of the Like Product and Subject Merchandise (Related).**

## C-8 Profitability

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

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

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

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

Table C-8.2: Profitability (All Products)

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

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

**ANSWER:**
**Please refer to Table C-8.1: Profitability (Like Product and Subject Merchandise) and Table C-8.2: Profitability (All Products).**

# SECTION D: DOMESTIC SALES OF THE LIKE PRODUCT

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

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

## D-1 General Information

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

   **ANSWER:**
   **Starting from the factory gate, finished subject products are transported by domestic truck from the Company's factory premises to the designated place by the customers or picked up by the customers themselves. The channel of distribution is the same to each class of customers.**

   **Distribution flow: Factory gate → Order negotiation & pricing → Sales contract → Goods dispatch from factory → Domestic transport → Customer receipt → Invoicing → Payment.**

   **Domestic delivery terms are EXW or delivered to to the designated place by the customers. Prices are negotiated per order, driven by raw- material cost, product specifications, order quantity and market conditions. Payment is settled via bank transfer or acceptance.**

   **Customer categorisation is based on customers' business activities and the end- use of purchased goods..**

2. Provide **detailed description of how sales are made**, indicating the procedure followed between time of order and delivery to the first customer. A **full explanation** of how the **invoicing** and **payment** is made should be given. Provide a separate sample **chronological flowchart** detailing every step in this process. Indicate the **average time frame** within which each step takes place. Please **differentiate** the sales process made through between **related** and **unrelated** companies.

   **ANSWER:**
   **Sales procedure from order receipt to delivery to the first customer:**
   **The sales process covers order receipt, internal review, production / stock confirmation, contract execution, goods dispatch, delivery, invoicing and payment settlement. We distinguish the sales process for unrelated-party customers and related-party customers. The core**

**procedural steps are identical for both groups; the main differences lie in credit assessment.**

**Chronological process flowchart**

| Step | Description | Average time frame |
|---|---|---|
| 1 | Customer submits purchase order (written order / formal enquiry) | 1-2 working days |
| 2 | Sales department reviews order: product specification, quantity, price, delivery requirement; credit risk assessment (more rigorous for unrelated parties; simplified internal review for related parties) | 1-2 working days |
| 3 | Internal confirmation of inventory or production capacity; confirm feasibility of delivery schedule | 1-2 working days |
| 4 | Sign sales contract / sales confirmation with customer | 10 working days |
| 5 | Production department prepares goods for shipment | 30 working days |
| 6 | Goods inspection completed; goods issue from factory warehouse | 0-1 working day |
| 7 | Domestic transportation to customer's designated location / customer picks-up goods at factory (EXW); goods delivered and accepted by the first customer | 1-2 working days |
| 8 | Issue VAT invoice | 1-7 working days upon payment completion |
| 9 | Customer makes payment via bank transfer against invoice | Payment before delivery |

**Invoicing mechanism**
**After goods are delivered and customer acceptance is confirmed, our finance department issues official VAT invoice in accordance with the signed sales contract. Invoice contains product description, quantity, unit price and total amount. Invoices are issued in electronic form.**

**Payment mechanism**
**Accepted payment methods are bank transfer and bank acceptance. Payment terms are negotiated on a case- by- case basis in sales contracts.**

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

**ANSWER:**
**The sales negotiation covers initial business contact, technical- commercial discussion, quotation, price bargaining, final contract confirmation, and post- delivery price adjustment (if any).**

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

**ANSWER:**
**Production begins after the customers have established their product specifications (contract).**

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

**ANSWER:**
**The Company's sales to domestic customers are conducted under short- term individual sales contracts/orders.**

**Process for agreeing contract, price and quantity of short-term contracts: Customers send inquiries. The Company's sales team provides quotations based on raw-material cost, market condition and order volume. After negotiation on price, quantity, delivery terms, both parties sign the sales contract or issue confirmed purchase order. Price and quantity are fixed for this specific transaction.**

**Price and quantity are fixed for the given order. Re- negotiation of price is only allowed upon mutual written consent of both parties before shipment. Neither party has a unilateral right to modify agreed price.**

**If either party intends to terminate the contract ahead of expiry, prior written notice shall be provided to the counterparty in accordance with contractual clauses.**

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

**ANSWER:**
**Not applicable, the Company does not have price lists.**

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

**ANSWER:**
**Not applicable, the Company does not have price lists or use a standard contract.**

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

**ANSWER:**
**Not applicable, there were no costs incurred by customers and subsequently paid or reimbursed by our company, either directly or indirectly.**

## D-2 Allowances on Domestic Sales

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

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

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

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

**ANSWER:**
**Please refer to Table D-3.1: Domestic Market Sales – Customer Listing (DOM-CUST) and Table D-3.2 : Domestic Market Sales Listing (DOM-SALE).**

2. Differences in physical characteristics:

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

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

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

**ANSWER:**
**Not applicable, there is no physical difference.**

3. Indirect taxes:

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

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

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

c. For each tax listed, provide separately information on the tax base or taxable price, the tax rate, the amount of taxes assessed, any deductions or offsets to the tax and the formula used to calculate the tax amount.

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

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

**ANSWER:**
**The indirect tax the Company pays in domestic sales is value-added tax. Please refer to Exhibit D-2.3 Value- Added Tax Law of the People's Republic of China for relevant details.**

4. Differences in discounts, rebates and quantities:

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

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

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

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

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

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

**ANSWER:**
**Not applicable, there are no discounts or rebates.**

4. Differences in the level of trade:

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

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

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

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

**ANSWER:**
**Not applicable, there are no differences in the level of trade.**

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

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

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

**ANSWER:**
**The Company has reported the inland transportation for transactions whose delivery term is Delivered to Designated Location and the amount is reported one by one following the transportation expense invoice.**

6. Differences in packing costs:

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

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

   **ANSWER:**
   **Not applicable, there are no packing costs.**

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

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

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

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

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

   **ANSWER:**
   **Please refer to Table D-3.2 : Domestic Market Sales Listing (DOM-SALE).**

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

   **ANSWER:**
   **Not applicable, Longcheng does not have short-term borrowings during the investigation period..**

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

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

   b. For each model/type, provide a separate record of warranty/guarantee expenses for sales of the like product.
   c. State how you calculated these expenses. Identify your source of data.

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

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

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

**ANSWER:**
**Not applicable, there are no costs of providing warranties and guarantees.**

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

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

**ANSWER:**
**Not applicable, there are no commissions .**

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

**ANSWER:**
**Inland transportation is recorded under the account 550101.**

12. Other factors:

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

**ANSWER:**
**Not applicable, there are no other factors.**

## D-3 Format of Submission

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

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

| Field name | Field description | Explanation |
|---|---|---|
| Y/Q | Year/quarter | Sales transaction of Year 1, Year 2 and POI. |
| TRCOMP-NAME | Trading company name | Names of your trading/intermediary company |
| TRCOMP-NO | Trading company code number | Trading/Intermediary company's code number used for each of your customers |

| Field name | Field description | Explanation |
|---|---|---|
| TRCOMP-REL | Trading company relation | “U” for unrelated trading/intermediary company; and “R” for related trading/intermediary company |
| CUST-NAME | Customer name | Customer name |
| CUST-NO | Customer code number | Customer code number |
| CUST-ADD | Customer address | Complete address of your customers |
| CUST-REL | Customer relation | “U” for unrelated customer and “R” for related customer |
| CUST-LEV | Customer level of trade | Code “1” for original equipment manufacturer (OEM); code “2” for distributor; code “3” for retailer; code “4” for end-user; and “5” for others (specify the customer type) |
| PDT-DES | Product description | Product description of the like product i.e., product name |
| PDT-CODE | Product sales code | Product sales code used for the like product |
| PDT-GRADE | Product grade | Product grade of the like product |
| PDT-CLASS | Product classification | Product classification (Prime or Non-Prime) according to producer/exporter |
| PDT-SPEC | Product specification | Product specification of the like product i.e., technical characteristic or any other relevant specification |
| PDT-USAGE | Product usage | Product usage of the like product |
| QTY | Quantity | Quantity of the like product sold (specify the unit of measurement used) |
| LP-TURNOVER | Like product’s turnover | Total turnover of the like product sold per customer (specify currency used) |
| TOT-TURNOVER | Total turnover of all product sold | Total turnover per customer for all products sold by your company (specify currency used) |
| SALES-DISC | Sales discounts | Total discounts granted to the customers of the like product (specify currency used) |

| Field name | Field description | Explanation |
|---|---|---|
| REB | Rebates | Total rebates granted to the customers of the like product (specify currency used) |
| PAY-TERM | Payment terms | Agreed payment terms (e.g., 30, 60, 90 days, etc.) |
| DEL-TERM | Delivery terms | Agreed terms of delivery (e.g., FOB, C&F, CIF, etc.) |

**ANSWER:**
**Please refer to Table D-3.1: Domestic Market Sales – Customer Listing (DOM-CUST).**

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

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

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

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

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

| Field name | Field description | Explanation |
|---|---|---|
| SALES-RETURN | Sales return value | Sales return value in the currency of sales (specify currency used) |
| OTH-DISC | Other discounts | Actual amount of discount that was not deducted from the invoice. If more than one type of other discount, insert additional column of data at this point for the additional types of other discounts (specify the types and currency used). Do not aggregate the discounts |
| REB | Rebate | Actual amount of rebate granted to the customer. If more than one type of rebate, insert additional column of data at this point for the additional types of rebates (specify the types and currency used). Do not aggregate the rebates |
| NET-QTY | Net quantity | Net quantity after credit/debit adjustment (specify the unit of measurement used) |
| NET-VAL CN/DN | Net sales value after credit/debit adjustments | Net sales value after all credit/debit notes adjustments, including the sales discounts, sales returns, sales tax/VAT and all other applicable adjustments as recorded in your accounting records (specify currency used) |
| DRAW | Import charges and indirect taxes | Amount of import charges and indirect taxes paid (specify currency used) |
| LEV-ADJ | Level of trade adjustment | Market value of the differences in level of trade |
| INL-FRE | Inland freight cost | Amount of inland freight cost in the domestic market (specify currency used) |
| PACK | Packing expenses | Amount of packing expenses (specify currency used) |
| BANK | Bank charges | Bank charges related to the transaction, e.g., document fee, bank commission, currency exchange, etc. (specify currency used) |
| CREDIT | Credit cost | Amount of cost of providing credit to your customer (specify currency used) |
| WARR | Warranty/ guarantee | Amount of warranty and guarantee expenses (specify currency used) |

| Field name | Field description | Explanation |
|---|---|---|
| AFT-SALE | Expenses for technical assistance | Amount of expenses for technical assistance and services (specify currency used) |
| COMM | Commission | Amount of commission paid related to the sales of the like product. If more than one type of commission is paid, insert additional column of data at this point for the additional types of commission paid (specify the types and currency used). Do not aggregate the commission. |
| OTHER | Other adjustments | Any other amount of adjustment (please specify) |

**ANSWER:**
**Please refer to Table D-3.2 : Domestic Market Sales Listing (DOM-SALE).**

# SECTION E: EXPORT SALES OF THE SUBJECT MERCHANDISE

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

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

## E-1 General Information

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

   **ANSWER:**
   **Distribution flow:**
   **Channel 1: Sales to distributors**

   **Factory gate → Domestic inland transportation → Customs export declaration → Ocean shipment → Overseas port → Delivery to independent distributors**

   **Sales terms: FOB, CFR or CIF**
   **Pricing basis: Based on production cost, raw-material fluctuation and order volume. Prices are negotiated on a transaction-by-transaction basis.**
   **Customer categorisation: Distributors purchase the like-product for resale to downstream buyers.**

   **Channel 2: Sales to end-users**

   **Factory gate → Domestic inland transportation → Customs export declaration → Ocean shipment → Overseas port → Delivery to end-user producers**

   **Sales terms: FOB, CFR or CIF**
   **Pricing basis: Based on production cost, raw-material fluctuation and order volume. Prices are negotiated on a transaction-by-transaction basis.**
   **Customer categorisation: End-user producers purchase the like-product for their own production or captive consumption, without further resale.**

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

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

**ANSWER:**
**Overall sales procedure:**
**First, the customer issues an official purchase order. The Company conducts internal review of product specifications, order quantity, delivery schedule and commercial terms. After confirmation of the sales contract, the production department arranges formal production. Upon completion of manufacturing and qualified quality inspection, goods are transported to the port for customs declaration and shipment. Finally, the goods are delivered to the first overseas customer in accordance with the agreed international trade terms.**

**Invoicing and payment procedure**
**Invoicing rules: The commercial invoices, together with full set of shipping documents (packing list, bill of lading, etc.) are issued before customs declaration and shipment. The invoice clearly records product name, specifications, transaction quantity, unit price, total amount and trade terms, which is consistent with the signed sales contract.**
**Payment rules:**
**The mainstream payment terms are T/T (Telegraphic Transfer) and L/C. All payments are executed strictly in accordance with contract agreements.**

| Step No. | Specific Operation Process | Average Time Frame |
|---|---|---|
| 1 | Receive official purchase order from overseas customer | 1 working day |
| 2 | Internal review of order terms & mutual confirmation of sales contract | 2-3 working days |
| 3 | Production scheduling and formal manufacturing of the like product | 30 working days |
| 4 | Finished goods quality inspection and qualification confirmation | 0-1 working days |
| 5 | Domestic inland transportation from factory to export port | 1-2 working days |

| Step No. | Specific Operation Process | Average Time Frame |
|---|---|---|
| 6 | Export customs declaration, inspection and customs clearance | 0-1 working days |
| 7 | Goods loading and ocean shipment arrangement | 1 working day |
| 8 | Ocean transportation to overseas destination port | 21-60 working days |
| 9 | Issue commercial invoice and complete shipping documents | Before making customs declaration |
| 10 | Customer completes payment per contractual terms | Subject to agreed payment terms |

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

**ANSWER:**
**Sales negotiation process is listed below:**
**1. Initial contact**
**Receive buyer's inquiry and make a preliminary communication.**
**2. Requirement clarification**
**Confirm product specifications, quantity, delivery, payment and trade terms.**
**4. Counter-offer and negotiation**
**Both parties bargain on price, payment terms and delivery time, and make mutual concessions.**
**5. Confirm business terms**
**Reach an agreement on all core transaction conditions.**
**6. Contract signing**
**Sign the Proforma Invoice or sales contract to formalize the deal.**
**8. After-sales price adjustment**
**Negotiate price deduction, compensation or rebate if quality, quantity or shipping problems occur after delivery.**

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

**ANSWER:**
**Production begins after the customers have established their product specifications (contract).**

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

**ANSWER:**
**The Company's sales to domestic customers are conducted under short‑term individual sales contracts/orders.**

**Process for agreeing contract, price and quantity of short‑term contracts: Customers send inquiries. The Company's sales team provides quotations based on raw‑material cost, market condition and order volume. After negotiation on price, quantity, delivery terms, both parties sign the sales contract or issue confirmed purchase order. Price and quantity are fixed for this specific transaction.**

**Price and quantity are fixed for the given order. Re‑negotiation of price is only allowed upon mutual written consent of both parties before shipment. Neither party has a unilateral right to modify agreed price.**

**If either party intends to terminate the contract ahead of expiry, prior written notice shall be provided to the counterparty in accordance with contractual clauses.**

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

**ANSWER:**
**Not applicable, the Company does not have price lists.**

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

**ANSWER:**
**Not applicable, the Company does not have price lists or use a standard contract.**

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

**ANSWER:**

**Not applicable, there were no costs incurred by customers and subsequently paid or reimbursed by our company, either directly or indirectly.**

## E-2 Allowances on Export Sales

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

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

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

1. Complete Table E-3.1 (EXP-CUST), Table E-3.2 (MY-SALE) and Table E-3.3 (TRC-SALE) in Excel format provided of all adjustments you claim (refer paragraph E-2.2 to E-2.12) for all sales to customers in Malaysia and appropriate third countries on a transaction-by-transaction basis. All allowances should be reported in the currency in which your accounts are kept.

   **ANSWER:**
   **Please refer to Table E-3.1: Export Sales - Customer Listing (EXP-CUST), Table E-3.2: Export Sales to Malaysia Listing (MY-SALE) and Table E-3.3: Export Sales to Appropriate Third Countries Listing (TRC-SALE).**

2. Differences in physical characteristics:

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

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

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

**ANSWER:**
**Not applicable, there is no physical difference.**

3. Indirect taxes:

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

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

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

c. For each tax listed, provide separately information on the tax base or taxable price, the tax rate, the amount of taxes assessed, any deductions or offsets to the tax and the formula used to calculate the tax amount.

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

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

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

**ANSWER:**
**Not applicable, there is no indirect tax for export sales.**

4. Differences in discounts, rebates and quantities:

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

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

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

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

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

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

**ANSWER:**
**Not applicable, there are no discounts or rebates.**

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

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

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

**ANSWER:**
**The Company has reported the inland transportation, handling, ocean freight and insurance for transactions and the amount is reported one by one following the transportation expense invoice.**

6. Difference in packing costs:

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

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

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

**ANSWER:**
**Not applicable, there are no packing costs.**

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

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

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

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

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

**ANSWER:**
**Please refer to Table E-3.2: Export Sales to Malaysia Listing (MY-SALE).**

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

**ANSWER:**
**Not applicable, the Company does not have short-term borrowings during the investigation period.**

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

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

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

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

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

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

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

**ANSWER:**
**Not applicable, there are no costs of providing warranties and guarantees.**

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

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

**ANSWER:**
**Not applicable, there are no commissions .**

11. Currency conversions:

*In order to compare export sales prices with domestic sales prices a conversation of currency will be required. Fluctuations in exchange rates can*

*only be taken into account under certain circumstances, i.e., when a fluctuation becomes a "sustained" movement.*

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

b. Provide the official central bank exchange rates specifying the official daily buying and selling rates of exchange used for the foreign currencies concerned during the last two years in connection with the export of goods and services.

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

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

**ANSWER:**
**Not applicable, the Company does not have currency conversion adjustment.**
**Please refer to Exhibit E-2.11.b Official Central Bank Exchange Rate.**
**The exchange rates used by your company for converting the payment of export sales are the exchange rates announced by the central bank on the first working days of each month. The exchange rate can also be found in Exhibit E-2.11.b.**

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

**ANSWER:**
**Inland transportation and handling charges are recorded under the account 550101.**
**Ocean freight is recorded under the account 1131.**
**Insurance is recorded under the account 550112.**

13. Other factors:

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

**ANSWER:**
**Not applicable, there are no other factors.**

## E-3 Format of Submission

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

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

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

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

**ANSWER:**
**Please refer to Table E-3.1: Export Sales - Customer Listing (EXP-CUST).**

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

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

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

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

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

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

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

**ANSWER:**
**Please refer to Table E-3.2: Export Sales to Malaysia Listing (MY-SALE).**

3. Provide information on transaction-by-transaction basis relating to **sales of subject merchandise** (produced and sold by your company) to **all customers** (unrelated and related customer) **in appropriate third countries** during the period of **Year 1, Year 2** and **POI**. For this purpose, use Excel format as per Table E-3.3.

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

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

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

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

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

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

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

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

# SECTION F: COSTS

## F-1 Accounting System and Policies

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

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

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

   **ANSWER:**
   **The Company adopts accounting principle in accordance with the Accounting Standards for Business Enterprises of China. Its fiscal year runs from January 1 to December 31 of each calendar year, which constitutes its accounting period. Financial statements are prepared on a monthly, quarterly and annual basis for internal management purposes. Annual financial reports are compiled in compliance with applicable Chinese accounting regulations and may be subject to external annual audit by an independent certified public accountant firm.**

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

   **ANSWER:**
   **The Company's financial accounting is prepared in compliance with Accounting Standards for Business Enterprises of China, the generally- accepted accounting principles applicable in China where the subject goods are manufactured.**

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

   **ANSWER:**
   **No changes have been made to the company's accounting methods during the past three financial years.**

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

   **ANSWER:**
   **Please refer to Exhibit F-1.4 Accounting Flowchart.**

5. Explain the financial accounting practices with regard to:

a. The valuation method for:

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

**ANSWER:**
**The inventory control method is weighted average method.**

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

**ANSWER:**
**Not applicable. The company has not recorded any inventory write- offs or write- downs for raw materials and finished goods**

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

**ANSWER:**
**Not applicable, the product concerned is produced according to orders and shipped immediately after completion; in addition, steel products are not easily damaged.**

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

**ANSWER:**
**Please see the table below:**

| Fixed asset category | Service life | Residual value rate% | Annual depreciation rate% |
|---|---|---|---|
| Electronic products | 3. 5 | 1.17, 1.5, 2, 5, etc | 32.94, 32.83, 32.67, 19%, etc |
| Tools and equipment | 8. 5, 10 | 5. 12.5, 13.33, 16.05 | 11.88, 16.79, 8.67, 10.94 |

**Fixed assets are depreciated using the straight-line method, which includes buildings, machinery and equipment, office equipment, and transportation vehicles. Determine the depreciation rate based on the fixed asset category, expected useful life, and residual value rate.**

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

**ANSWER:**
**The Company adopts actual costing methodology.**

c. Treatment of foreign exchange gains and losses.

**ANSWER:**
**For foreign currency economic transactions, the initial recognition uses the spot exchange rate on the transaction date to convert the foreign currency amount into the accounting base currency amount.**
**On the balance sheet date, foreign currency monetary items are calculated using the spot exchange rate on the balance sheet date. Any exchange differences arising from the difference between the spot exchange rate on the balance sheet date and the spot exchange rate at initial recognition or the previous balance sheet date are recognized in the current period's income statement. Foreign currency non monetary items measured at historical cost shall still be translated at the spot exchange rate on the transaction date, without changing their accounting currency amount.**

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

**ANSWER:**
**Not applicable, the expenses are not capitalised.**

e. Provision for bad or doubtful debts.

**ANSWER:**
**The Company does not make any provision for bad debts and uses the direct write off method to recognize bad debt losses.**

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

**ANSWER:**
**The Company did not have idle equipment.**

g. Cost of plant disclosure.

**ANSWER:**
**Not applicable, there is no such cost.**

h. Restructuring costs.

**ANSWER:**
**Not applicable, there is no such cost.**

i. The effects of inflation on financial statement information.

**ANSWER:**
**Not applicable, the company’s financial statement was not affected by inflation.**

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

**ANSWER:**
**The Company accounts for incidental revenue such as sales of scrap, by- products and co- products in accordance with the applicable accounting standards.**

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

**ANSWER:**
**The Company allocates costs and accounts for revenue in respect of by- products, co- products and scrap pursuant to prevailing accounting standards and internal cost- accounting policies.**

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

a. Chart of accounts and trial balance.

**ANSWER:**
**Please refer to Exhibit F-1.8a Chart of accounts and trial balance.**

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

**ANSWER:**
**Please refer to Exhibit F-1.8b Audit Reports.**

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

**ANSWER:**
**Not applicable, the Company does not have such internal financial statements or profit and loss reports.**

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

**ANSWER:**
**Please refer to Exhibit F-1.8d Audit Reports of Related Company.**
**The Company refers to Jialong.**

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

a. A general description of the company's cost accounting method as it relates to allocating production costs to individual unit of the like product and subject merchandise (e.g., job order, process costing). State whether the cost accounting system is an integral part of the financial accounting system used for the preparation of financial statements.

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

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

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

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

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

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

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

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

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

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

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

**ANSWER:**
**Not applicable, the Company does not have a cost accounting system. Instead, its costing is raw material purchase cost plus the manufacturing fee.**

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

**ANSWER:**
**The address where the accounting records concerning the activities of the company are located is DIANZI INDUSTRIAL ZONE, BOXING COUNTY, BINZHOU CITY,SHANDONG PROVINCE, CHINA.**

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

**ANSWER:**
**Please refer to Table C-8.2 Profit All_Y2 and Table C-8.2 Profit All_POI for the calculation of net profit margin for whole company basis, and Table C-8.1 Profit LP_Y2 and Table C-8.1 Profit LP_POI for the like product and subject merchandise.**

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

**ANSWER:**
**The company normally does not calculate the profit margin for the like product and subject merchandise, and the company calculates the profit level for the like product and subject merchandies in the Table C-8.1 Profit LP_Y2 and Table C-8.1 Profit LP_POI, where the sales revenues and cost are reported on actual basis, and expenses are allocated by sales revenues.**

## F-2 Purchase of Raw Materials and Finished Goods

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

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

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

| Field name | Field description | Explanation |
|---|---|---|
| SEQ-NO | Sequence number | Sequential number for each transaction, or line item, in the purchase listing (i.e., the first transaction is “1”, the second is “2”, and so on) |
| ACC-NO | Accounting ID number | Accounting ID or document number as recorded in accounting system |
| CODE | Company internal coding system | Code used for the product purchased |
| INV-NO | Invoice number | Actual invoice number |
| INV-DATE | Invoice date | Actual invoice date of the transaction |
| SU-NAME | Supplier name | Supplier name |
| SU-CO | Supplier country | Supplier country |
| SU-REL | Supplier relation | “U” for unrelated supplier; and “R” for related supplier |
| PR-NAME | Producer/ Manufacturer name | For purchases of finished goods were made through trader or distributor, state the name of producer/manufacturer |
| ORD-NO | Purchase order/contract number | Purchase order or contract number of the transaction concerned |

| Field name | Field description | Explanation |
|---|---|---|
| ORD-DATE | Date of purchase order /contract | Order date for which the purchase order/contract was issued |
| RM/FG-CAT | Raw materials /Finished goods category | “RM” for raw materials or “FG” for finished goods |
| RM/FG-TYPE | Raw materials /Finished goods type | Types of raw materials/finished goods |
| QTY | Quantity | Quantity of raw materials/finished goods purchased (specify the unit of measurement used) |
| GR-VAL | Gross invoice value | Gross invoice value of the purchase, inclusive of sales tax/VAT (specify currency used) |
| PURC-DISC | Purchase discount | Purchase discount deducted on the invoice referred for the transaction (specify currency used) |
| SALES-TAX | Sales tax/VAT | Actual amount of sales tax/VAT charged on the supplier's invoice (specify currency used) |
| NET-VAL | Net invoice value | Net invoice value of the transaction after purchase discount and sales tax/VAT on the invoices, in the currency of purchase (specify currency used) |
| CURR | Invoice currency | Currency in which the purchase transaction was made |
| EXCH | Exchange rate | Exchange rate used for the conversion of the currency of purchase to the currency of your accounting records |
| NET-INV | Net invoice value recorded in accounting records | Net invoice value of the transaction after purchase discount and sales tax/VAT, in the currency as it entered in your accounting records (specify currency used) |
| DOC-TYPE | Type of document | Type of document:<br><br>“CN” for credit note; and “DN” for debit note<br>(if applicable for each transaction or line item) |

| Field name | Field description | Explanation |
|---|---|---|
| CN/DN-NO | Credit/debit note number | Credit/debit note number issued for the transaction concerned |
| CN/DN DATE | Credit/debit note date | Date of credit/debit note issued for the transaction concerned |
| CN/DN-CAT | Credit/debit note category | Credit/debit category (i.e., discount, rebate, purchase return, price adjustment, quantity adjustment) |
| REMARK | Credit/debit notes remark | Reason for issuing the credit/debit notes (e.g., cash discount, loyalty discount, bulk purchase, rebate, purchase return, quality issue and other) |
| CN/DN-QTY | Quantity credited/debited | Quantity credited/debited as appropriate (specify the unit of measurement used) |
| PURC-RETURN | Purchase return value | Purchase return value in the currency of purchase (specify currency used) |
| OTH-DISC | Other discounts | Actual amount of discount that was not deducted from the invoice. If more than one type of other discount, insert additional column of data at this point for the additional types of other discounts (specify the types and currency used). Do not aggregate the discounts |
| REB | Rebate | Actual rebate received for the transaction (specify currency used) |
| NET-QTY | Net quantity | Net quantity after credit/debit adjustment (specify the unit of measurement used) |
| NET-VAL CN/DN | Net purchase value after credit/debit adjustments | Net purchase value after all credit/debit notes adjustments, including the purchase discounts, purchase returns, sales tax/VAT and all other applicable adjustments as recorded in your accounting records (specify currency used) |
| DATE-PAY | Date of payment | Date on which the company made payment |
| MODE-PAY | Mode of payment | Mode of payment made to the supplier (e.g., cash, bank draft, telegraphic transfer (TT), letter of credit (LC), etc.) |

| Field name | Field description | Explanation |
|---|---|---|
| PAY-TERM | Payment terms | Agreed payment terms (e.g., 30, 60, 90 days, etc.) |
| DEL-TERM | Delivery terms | Agreed terms of delivery (e.g., FOB, C&F, CIF, etc.) |
| DEL-CS | Delivery costs | Delivery costs either as actual costs or as a function of the invoice value (%) or volume (costs per unit) |
| OTHER | Other adjustments | Any other adjustments (please specify) |

**ANSWER:**
**Please refer to Table F-2.1: Raw Materials and Finished Goods Purchase Listing (RAWMAT/FG-PUR).**

## F-3 Cost to Make and Sell

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

Table F-3.1: Cost of Production

| Item | Like product and Subject Merchandise | | | | | All products | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Year 1/ Year 2/ POI *(specify currency and unit of measurement)* | | | | | Year 1/ Year 2/ POI *(specify currency and unit of measurement)* | | | | |
| | Q1 | Q2 | Q3 | Q4 | Total | Q1 | Q2 | Q3 | Q4 | Total |
| Total quantity of production | | | | | | | | | | |
| Variable manufacturing costs:<br>Raw materials *(specify)*<br>Direct labour<br>Variable manufacturing overhead *(specify)*<br>Others *(specify)* | | | | | | | | | | |
| **A. Total variable manufacturing costs** | | | | | | | | | | |
| Fixed manufacturing costs:<br>Indirect labour<br>Fixed manufacturing overhead *(specify)*<br>Other *(specify)* | | | | | | | | | | |
| **B. Total fixed manufacturing costs** | | | | | | | | | | |
| Work in progress:<br>(+) Opening work in progress<br>(-) Closing work in progress | | | | | | | | | | |

| | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| **C. Total work in progress** | | | | | | | | | | |
| **Total cost of production (A+B+C)** | | | | | | | | | | |

**ANSWER:**
**Please refer to Table F-3.1: Cost of Production.**

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

**ANSWER:**
**Not applicable.**

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

**ANSWER:**
**Please refer to Table F-3.1: Cost of Production.**

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

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

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

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

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

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

**ANSWER:**
**Please refer to Table F-3.2 – Cost to Make and Sell Per Unit.**

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

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

| Field name | Field description | Explanation |
|---|---|---|
| SEQ-NO | Sequence number | Sequential number for each transaction, or line item (i.e., the first transaction is “1”, the second is “2”, and so on) |
| PDT-CODE | Product sales code | Product sales code as reported in Table D-3.2 for the **like product sold** during **Year 1, Year 2** and **POI** in your records |
| PDT-GRADE | Product grade | Product grade of the **like product sold** during **Year 1, Year 2** and **POI** in your records |
| QTY-SOLD | Quantity sold | Quantity sold for the **like product** during **Year 1, Year 2** and **POI** in your records (specify the unit of measurement used) |
| QTY-PROD | Quantity produced | Quantity produced for the **like product** during **Year 1, Year 2** and **POI** in your records (specify the unit of measurement used) |
| DIR-RM | Direct raw material | Raw material cost for the **like product sold** during **Year 1, Year 2** and **POI** in your records (specify currency used) |
| DIR-OM | Direct other material | Other direct raw material cost for the **like product sold** during **Year 1, Year 2** and **POI** in your records (specify currency used) |
| DIR-LAB | Direct labour | Direct labour cost for the **like product sold** during **Year 1, Year 2** and **POI** in your records (specify currency used) |
| VAR-OH | Variable manufacturing overhead | Variable manufacturing overhead cost. If more than one type of variable manufacturing overhead costs, insert additional column of data at this point for the additional costs (specify the costs and currency used) for the **like product sold** during **Year 1, Year 2** and **POI** in your records. Do not aggregate the costs. |
| OTH-VAR | Others variable manufacturing | Other variable manufacturing costs (specify the costs and currency used) for the **like product sold** during **Year 1, Year** |

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

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

| Field name | Field description | Explanation |
|---|---|---|
| | | (UNI-COGS + UNI-SGA) |

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

| Field name | Field description | Explanation |
|---|---|---|
| SEQ-NO | Sequence number | Sequential number for each transaction, or line item (i.e., the first transaction is "1", the second is "2", and so on) |
| PDT-CODE | Product sales code | Product sales code as reported in Table E-3.2 for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records |
| PDT-GRADE | Product grade | Product grade of **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records |
| QTY-SOLD | Quantity sold | Quantity sold for the **subject merchandise** during **Year 1, Year 2** and **POI** in your records (specify the unit of measurement used) |
| QTY-PROD | Quantity produced | Quantity produced for the **subject merchandise** during **Year 1, Year 2** and **POI** in your records. (specify the unit of measurement used) |
| DIR-RM | Direct raw material | Raw material cost for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records (specify currency used) |
| DIR-OM | Direct other material | Other direct raw material cost for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records (specify currency used) |
| DIR-LAB | Direct labour | Direct labour cost for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records (specify currency used) |
| VAR-OH | Variable manufacturing overhead | Variable manufacturing overhead cost. If more than one type of variable manufacturing overhead costs, insert additional column of data at this point for the additional costs (specify the costs and currency used) for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. Do not aggregate the costs. |

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

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

| Field name | Field description | Explanation |
|---|---|---|
| | | (TOT-SGA / QTY-SAL) |
| UNI-COS | Cost per unit | Unit cost of goods sold plus unit SG&A for the **subject merchandise sold** during **Year 1, Year 2** and **POI** in your records. (specify currency used)<br><br>(UNI-COGS + UNI-SGA) |

**ANSWER:**
**Please refer to Table F-3.3: Cost to Make and Sell by Grade (DOM-CTMS) and Table F-3.4: Cost to Make and Sell by Grade (MY-CTMS).**