Trade Remedies Authority

Anti-Dumping Questionnaire (Exporter)
Case AD0091: Linear Low Density Polyethylene (LLDPE) exported from The United States of America

Period of Investigation (POI):	1 January 2025 to 31 December 2025
Injury period:	1 January 2022 to 31 December 2025
Deadline for response:	**11 September 2026**
Contact details:	AD0091@traderemedies.gov.uk
Completed on behalf of:	*Chevron Phillips Chemical Company LP (also **CPChem**)*

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

☒ Confidential

☐ Non-confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annexes. Please note that you will have to provide **Confidential** and **Non-Confidential** versions of the questionnaire and annexes, as well as of any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **11 September 2026.**

If information is not supplied within a reasonable time, the TRA may make determinations on the basis of the facts available.

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Introduction

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry. The TRA has been established to provide the UK with its own independent trade remedies system.

This case is investigating the allegation that Linear Low Density Polyethylene (LLDPE) from the United States (US) are being dumped (exported to the United Kingdom (UK) at prices less than their normal value) and that this dumping is causing injury to the UK industry for these goods.

Why should I take part?

We are asking foreign exporters to complete this questionnaire to help us understand the industry and market for this product and assess if a measure is needed. We need to establish whether the alleged dumping has occurred and has caused injury to the UK industry.

If you are an exporter of the goods concerned to the UK but do not produce these goods, please complete Annex I, as well as sections of the questionnaire you are reasonably able to answer. Furthermore, please provide the Case Team with contact details for the company/companies that produce the goods concerned that you export.

The information your company provides will help us to reach a fair and proportionate decision.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the instructions section below.

Please provide all the information requested by **11 September 2026.** We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary. Therefore, please provide as much detail as possible in your responses.

Where can I find more information?

Our trade remedies guidance provides general information about our investigations and processes we follow.

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at AD0091@traderemedies.gov.uk .

You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 as Amended by the Trade Remedies (Amendment) (EU Exit) Regulations 2019* and under the *Taxation (Cross-border Trade) Act 2018.*

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire.

If you think you won't be able to complete the questionnaire within the required time, please contact the Case Team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our public file to record both the request and the extension granted.

How to answer the questions

Please read and follow all the instructions carefully. Your company will need to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all these documents, your completed spreadsheet annexes and any calculations you made when developing your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why. If the answer to a question is “zero”, “no” or “none”, please write this.
- Please complete the spreadsheet annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g., 23/05/2019).
- Unless otherwise stated, ‘year’ or ‘calendar year’ refers to the period 1 January – 31 December and ‘quarter’ refers to the associated three-month periods e.g. 1 January – 31 March, 1 April – 30 June, etc.
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g., do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g., ‘1,300’ for one-thousand three hundred, ‘1,300,000’ for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g., £1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of tax unless otherwise stated.
- Please refer to the case number, AD0091, in any correspondence with the TRA.

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annexes by the due date. We will publish the non-confidential version on the public file. **Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.**

Please see our guidance on how to submit information for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential e.g. the data is commercially sensitive.
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If you do not provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019)* and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/cases.

Providing information from subsidiaries or associated parties

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our investigation covers all subsidiaries and any other associated companies involved in the import, production, sale, R&D, distribution and/or supply of the like good and/or goods concerned.

Please note, both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in Regulation 128 of the Customs (Import Duty) (EU Exit) Regulations 2018.

- If any of your subsidiaries or associated companies are also an exporting producer of the goods concerned they should **also** complete the main questionnaire. Please make sure you provide your subsidiaries with access to this questionnaire.
- If your subsidiaries or associated companies are not producers but are involved in the sales and/or marketing of the export goods concerned to the UK, they

should complete Annex I, as well as sections of the questionnaire they are reasonably able to answer.
- If your subsidiaries or associated parties are producers but are not involved in the sales and/or marketing of the export good to the UK, they should complete the relevant sections of the questionnaire.

If you have any queries about this part of the process, please contact the Case Team using the details provided on the cover of this questionnaire.

What happens next

Once you have completed your questionnaire responses including the corresponding annex(es) and any additional documents requested, you must upload confidential and non-confidential versions through our Trade Remedies Service. Following this:
- you will receive an email confirming the documents have been uploaded successfully.
- the Case Team will contact you if further information is required;
- the non-confidential responses will be placed on the public file; and
- the Case Team may contact you to arrange a visit to verify the information contained in your responses.

Verifying the information you supply

The TRA will verify, as far as possible, the information provided to it. As part of this process, we may conduct verification visits. If we need to verify information that you provide by visiting your premises, the Case Team will contact you to arrange this.

Visits can last several days, during which we will want to speak to management and staff to help establish the completeness, relevance and accuracy of the information provided.

Please keep a record of formulas and steps used in your calculations and other related material/documentation as it may be asked for during verification.

In some circumstances, verification may be conducted remotely.

The team are preparing for verification for exporters expected to be between 5 - 20 October 2026. Please indicate any dates during this time when you would be less able to host a verification visit, together with reasons.

Answer: CPChem's team has limited availability in the week of Oct 12-16. As discussed with the TRA, CPChem is available in the week of 19 October.
Appendix reference: None

Once verification is complete, the TRA will prepare a report and share a draft with you. The TRA will then ask you to prepare a non-confidential copy of the report for the public record. If you feel some information in the report should be kept confidential, please provide your reasons for this.

The scope of this investigation

Goods concerned

This investigation covers **Linear Low-Density Polyethylene (LLDPE)** exported from the **United States of America (US),** described as:

Polyethylene is a thermoplastic polymer made from the polymerization of ethylene (C_2H_4). Polyethylene can be produced in a number of different grades, including high density (HDPE), low density (LDPE) and – specific to this case – linear low-density polyethylene (LLDPE).

Within LLDPE there are additional product variants where ethylene is combined with different co-monomers:

a) C4 (butene)
b) C6 (hexene)
c) C8 (octene)

.In this questionnaire, these goods will be referred to as '**the goods concerned**'. Any reference to 'goods concerned' in this questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.

Like goods

In addition to seeking information about your company's export sales to the UK of the goods concerned this questionnaire will also ask about your sales of like goods in your domestic market and to third countries. Any reference to '**like goods**' in this questionnaire refers to goods which are like the goods concerned in all respects, or with characteristics closely resembling them.

Please follow the instructions for each question to provide the appropriate information regarding the like goods and goods concerned.

Product Control Numbers

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

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

These **LLDPE** are currently classifiable within the following CN code(s).

3901 10 10 20	3901 40 00 10
3901 10 10 50	3901 40 00 30
3901 10 10 60	3901 40 00 50
3901 10 10 90	3901 40 00 60
3901 10 90 30	3901 40 00 90
3901 10 90 90	3901 90 80 99

Table 1: PCN Table

Characteristic	Symbol	Description
Type of polyethylene	L	Linear Low Density Polyethylene (LLDPE)
Number of co-monomers	C4	4 - Butene
	C6	6 – Hexene
	C8	8 – Octene
Catalyst	Zn	Ziegler-Nata catalysts
	Me	Metallocene catalysts
	Ot	Other
Production method	G	Gas Phase process
	L	Solution Phase process
	S	Slurry Loop (liquid) Phase process

If a manufacturer produces Linear Low-Density Polyethylene (LLDPE) C6 using a Ziegler-Nata catalyst via a gas phase process the PCN code would be **“LC6ZnG”**

In this questionnaire and the corresponding annexes, you will be asked to construct PCNs representing the different types of products you produce. When giving your PCNs, please do not use any spaces, dashes or other means of separation, and ensure you follow the order of characteristics outlined in the table above.

1. Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between products.

Answer: While metallocene products represent a distinct category with differentiated technology and performance characteristics, variations in melt index and density within the broader linear low-density polyethylene classification can also play a critical role in determining suitability for specific manufacturing equipment, processing conditions, and end-use applications. Resins with different melt index and density combinations are generally not interchangeable without potentially significant impacts on processability, product performance, or both. In addition, differences in additive packages can materially influence end-use performance characteristics, yet these attributes are not captured within the PCN structure outlined in this document. All these changes are reflected in different costs to produce and, thus, sales prices. As a result, the PCN framework may not fully reflect the performance distinctions, substitution limitations or commercial conditions that exist among products within the broader LLDPE category.

2. Please comment on the suitability of the PCN structure in regard to your product range. This may include areas such as:
   - Categorisation of features;
   - Number of products included under “Other” which may exclude a fair comparison;
   - Specialised products which may unduly influence the comparison.

Answer: All products shipped to the UK during the POI were categorized as LC6MeS (mLLDPE). This category accounts for approximately *[Redacted – Confidential Commercial Data]% of CPChem*'s overall LLDPE sales to all regions, whereas the remaining *[Redacted – Confidential Commercial Data]% is classified as [Redacted – Confidential Product Designation]*.

3. Please provide details of any manufacturing process differences which you feel may influence the PCN structure and the price comparison between the goods concerned and the like goods.

Answer: As indicated above in response to Question 1, cost of production and run rates can vary based on additive packages and target resin density. These differences can create price differentials within the PCN structure proposed by the TRA.

SECTION A:
Company structure and operations

A1 Identity and contact details

1. Please complete the table below, ensuring that the point of contact given has the authority to provide this information:

Legal name of company:	Chevron Phillips Chemical Company LP
Legal structure (e.g., limited company, sole trader, partnership etc)	Limited Partnership
Year of establishment:	2000
Other operating names:	CPChem
Company registration number:	3218303
Place of registration:	Delaware
Name (point of contact):	*[Redacted – Contains personal information]*
Position:	Director, Business - Polymers
Address:	9500 Lakeside Blvd, The Woodlands, TX 77381 (United States)
Telephone No:	*[Redacted – Contains personal information]*
Email:	*[Redacted – Contains personal information]*
Website:	www.cpchem.com

2. If you have appointed an external party to act on your behalf in this investigation, please provide their details and attach a letter confirming the TRA should contact them directly:

Name:	*[Redacted – Contains personal information]*
Address:	*[Redacted – Contains personal information]*
Telephone No.:	*[Redacted – Contains personal information]*
Email:	*[Redacted – Contains personal information]*
Confirm they have signed authority to act (Yes/No):	Yes
	Appendix reference: Appendix A1.2 – LoA to VBB

A2 About your company

1. Describe the role of your company in relation to exports of the goods concerned to the UK market (e.g., producer, producer/exporter or exporter/distributor). Please make it clear whether you are a producer, and if you are not, please contact us within seven days with details of the producers that supply you.

Answer: CPChem produces the goods concerned and exports them to various countries, including the UK.
Appendix reference: None.

2. Please provide details of any changes in the legal form of your business over the past 5 years, for example, mergers, acquisitions and/or sales.

Answer: Not applicable. CPChem has not undergone any changes in its legal form over the past 5 years.

Date	Legal form	Explanation of change
		No changes

3. List and explain all authorisations your company has been required to obtain to produce, sell, or to export the goods concerned. These may include licences, permits, permissions or mining concessions. Indicate if your company is subject to any direct or indirect, quantitative or other, restrictions on any of these activities.

Answer: CPChem obtained the UK REACH registration for ethylene and 1-hexene. CPChem has various federal and state environmental permits where it operates. CPChem also is required to maintain registration and be in good standing to conduct business in various states and files annual reports or registrations in each of those states.
Appendix reference: Appendix A2.3 – UK REACH Registration *[Confidential]*

4. List all international production standards (BS/ EN/ ISO/ ASTM etc) your company currently conforms to, for the like goods / goods concerned.

Answer: The goods in question are produced at three manufacturing sites, all of which are ISO 9001 certified.	
	Appendix reference: Appendix A2.4 – International Production Standard *[Confidential]*

5. State whether your company is a member of any representative organisations (e.g., trade bodies, associations, Chambers of Commerce). If so, provide a copy of the relevant documentation.

Answer: Please find below a list of the main representative organizations related to CPChem's PE business in the US and Europe, along with links to their respective membership directories, in which CPChem is listed as a member. **US** ACC: American Chemistry Council – List of members AFPM: American Fuels and Petrochemicals Manufacturers – List of members PLASTICS: US plastics industry association (aka PIA) – List of members **Europe** AmCham EU: American Chamber of Commerce to the EU – List of members CEFIC: European Council of Chemical Associations – List of members CEFLEX: Initiative for the Circular Economy of Flexible Packaging – List of members Plastics Europe – List of members	
	Appendix reference: None.

A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) and legal persons (e.g. companies) are associated where they meet the definition of 'related persons' in Regulation 128 of the *Customs (Import Duty) (EU Exit) Regulations 2018.*

1. Please complete **Section A – Company structure and operations**, subsection **A3 – Organisational structure** of **Annex II** for your company's worldwide corporate structure and affiliations.

2. Please explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure, all sites/locations and departments which are involved in the production, sale, R&D, supply and distribution of the like goods or goods.

Answer: CPChem is a Delaware limited partnership headquartered at 9500 Lakeside Boulevard, The Woodlands, Texas 77381, USA. It is the principal operating entity for the manufacture, marketing, transportation and sale of petrochemicals, polymers and related products.

Its partners are Chevron Phillips Chemical Holdings I LLC (limited partner, *[Redacted – Confidential Ownership Data]%) and Chevron Phillips* Chemical Holdings II LLC (general partner, *[Redacted – Confidential Ownership Data]% and [Redacted – Confidential Ownership Data]% of voting control*). Both are wholly owned by Chevron Phillips Chemical Company LLC (Delaware), which is owned *[Redacted – Confidential Ownership Data]% by Chevron U.S.A.* Inc. and *[Redacted – Confidential Ownership Data]% by Phillips 66* Company, indirect subsidiaries of Chevron Corporation and Phillips 66 respectively (both publicly traded).

CPChem operates through business units and corporate functions led by officers of the partnership, including *[Redacted – Confidential Internal Organizational Structure]* — covering, respectively, production, sale, R&D, supply and distribution of the subject goods.

CPChem Group operates *[Redacted – Confidential Operational Data]* manufacturing and research facilities, with manufacturing in the United States (through CPChem), Belgium, Qatar and Saudi Arabia. Non-U.S. sales, supply and distribution are conducted through wholly owned subsidiaries and branches in Europe, Asia, and elsewhere.

Appendix reference:
Appendix A3.2 – Structure Charts *[Confidential]*

A4 Board members and principal shareholders

1. Please complete **Section A – Company structure and operations, subsection A4 – Owners and shareholders of Annex II** for:
   a. all your company's shareholders that owned more than 5% of its shares during the period of investigation (POI) 1 January 2025 to 31 December 2025
   b. the Board of Directors during the POI 1 January 2025 to 31 December 2025

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

Answer: *[Redacted – Confidential Governance Data]*

Appendix reference: None.

3. If applicable to your company, please attach the latest copy of the following documents (in the original language and in English):
   - articles of association and all related documents;
   - business licence;
   - proof of registration of the company with the competent authorities.

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

Answer: CPChem is providing copies of:
- Certificate of Limited Partnership of CPchem filed with the State of Delaware – Appendix *[confidential]*
- Certificate of Good Standing from State of Delaware – Appendix *[confidential]*
- Agreement of Limited Partnership – Appendix *[confidential]*

Appendix reference:
Appendix A4.3 - Organizational Documents *[Confidential]*

A5 Operational links with other companies or persons

1. Complete the table below if your company has established long term agreements or relationships with any company/companies located in the UK, the US or in third countries for the production (e.g. sub-contracting), supply and sale of the like goods, or other licensing, technical patent or compensatory agreements.

   If your company has long-term agreements with other companies/persons for the supply of goods destined for internal sale, e.g. captive use, please provide the contract to demonstrate this.

Answer: To ensure adequate and continuous supplies for its production, CPChem has established long-term supply agreements with *[Redacted – Confidential Supplier Identification]*. These companies supply around *[Redacted – Confidential Supply Data]*] of the company's current ethylene feedstock requirements for the goods concerned. Ethylene produced by CPChem is then used by CPChem as a feedstock for production of various products, including LLDPE.

[Redacted – Confidential Business Data]

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix number of contract
[Redacted - Confidential supplier/counterpart y identification]	*[Redacted - Confidential contract type/agreement identification]*	*[Redacted - Confidential corporate registration data]*	Appendix A5.1.1 *[Confidential]*
[Redacted - Confidential supplier/counterpart y identification]	*[Redacted - Confidential contract type/agreement identification]*	*[Redacted - Confidential corporate registration data]*	Appendix A5.1.2 *[Confidential]*
[Redacted - Confidential supplier/counterpart y identification]	*[Redacted - Confidential contract type/agreement identification]*	*[Redacted - Confidential corporate registration data]*	Appendix A5.1.3 *[Confidential]*
[Redacted - Confidential supplier/counterpart y identification]	*[Redacted - Confidential contract type/agreement identification]*	*[Redacted - Confidential corporate registration data]*	Appendix A5.1.4 *[Confidential]*
[Redacted - Confidential supplier/counterpart y identification]	*[Redacted - Confidential contract type/agreement identification]*	*[Redacted - Confidential corporate registration data]*	Appendix B3.8.2 *[Confidential]*
[Redacted - Confidential supplier/counterpart y identification]	*[Redacted - Confidential contract type/agreement identification]*	*[Redacted - Confidential corporate registration data]*	Appendix B3.8.1 *[Confidential]*
		Appendix reference: Appendix A5.1- Long Term Agreements *[Confidential]* and B3.8 - Distribution Agreements Related Companies *[Confidential]*	

A6 Accounting practices

1. Give the address where your company's accounting records are kept. If records are maintained in different locations, please indicate which records are kept at which location. If records are digital and do not have a physical location, please mark as N/A.

Records address	What records are held?
N/A	N/A

Answer: The company' accounting records are kept at its headquarters (see above).

2. Please give the financial year convention your company uses for its accounts (e.g. 1 January – 31 December). If any changes have occurred with respect to this period or in your accounting practices over the last four financial years, please describe these changes.

Answer: The company's financial year runs from 1 January to 31 December. Please refer to Chevron Phillips Chemical Company LLC's financial statements provided in Appendix A6.3.

Appendix reference: Appendix A6.3 - Audited Financials *[Confidential]*

3. For your company and any associated parties involved in the production, marketing or sales of the goods concerned, please attach a copy of your audited accounts covering the injury period including the financial statements and audit reports.

Answer: *[Redacted – Confidential Financial Reporting Status]* The audited accounts of Chevron Philipps Chemical Company LLC (CPChem's mother company) for the years 2022, 2023, 2024 and 2025 are provided in Appendix A6.3.

Appendix reference:
Appendix A6.3 - Audited Financials *[Confidential]*

4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the injury period.

Answer: Not applicable.

Appendix reference: None.

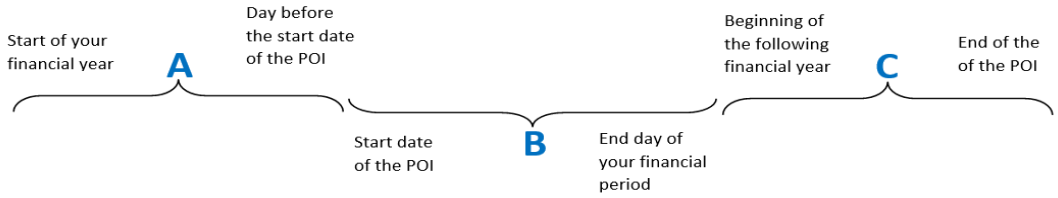
5. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI 1 January 2025 to 31 December 2025. If your financial year is fully aligned with the POI, this is all that is required.

   Where your financial period is not aligned with the POI, please provide trial balances (in original and spreadsheet form) to cover the following periods:

   A. the trial balance which starts from the beginning of your financial year and ends on 31 December 2024;

   B. the trial balance which starts from 1 January 2025 to the end of your financial year; and

   C. the trial balance which starts from the beginning of your following financial year and ends on 31 December 2025.



Answer: A copy of the trial balance of Chevron Philipps Chemical Company LLC covering the POI (1 January 2025 to 31 December 2025) is provided in Appendix A6.5.1 – *[confidential]*. A copy of the trial balance of CPChem for 2022 and 2024 is provided in Appendix A6.5.2 – *[confidential]*.

Appendix reference:
Appendix A6.5 - Trial Balance *[Confidential]*

6. For your company and any associated parties involved in the production, marketing or sales of the goods concerned, please attach copies of relevant management reports (e.g. profit and loss statement) for the profit centre that includes the goods and like goods. Please provide these reports for the (i) POI and (ii) most recently completed financial year.

Answer: A copy of the income statements of Chevron Philipps Chemical Company LLC for the POI, 2024, 2023 and 2022 are provided in Appendix A6.6.1 – *[confidential]*. Appendix A6.6.2 – *[confidential]* contains the income statements of the three assets owned by Chem that produce the goods concerned.

Appendix reference:
Appendix A6.6 – Income Statements *[Confidential]*

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

Answer: Not applicable.	
	Appendix reference: None.

8. Please provide a detailed description of your financial accounting system, explaining how sub-ledgers (e.g. costing, debtors, creditors) and other sales or production systems integrate with the general ledger. Please provide a description of how it links to the management accounting system, including any manual interventions. Please also attach:
   - your company's chart of accounts; and
   - your company's cost centres.

Answer: CPChem operates *[Redacted – Confidential Internal Systems/Process Data] in which* operational processes *[Redacted – Confidential Internal Systems/Process Data] feed* specialized sub-ledgers that automatically generate postings to the General Ledger. The General Ledger serves as the authoritative source for statutory financial reporting. Management accounting is primarily driven through *[Redacted – Confidential Internal Systems/Process Data] reporting* layers that consume GL and operational data to support forecasting, budgeting, margin analysis, and performance management. Manual intervention occurs mainly during *[Redacted – Confidential Internal Systems/Process Data]*	
	Appendix reference: Appendix A6.8 – Accounting Policies *[Confidential]*

9. Have you changed your financial policies and/or accounting systems during the injury period? Please explain the changes, including dates and the reasons for those changes along with the financial impact of those changes on the goods concerned or like goods.

Answer: CPChem adopts new accounting guidance as prescribed by the Financial Accounting Standards Board, *[Redacted – Confidential Internal Systems/Process Data]*	
	Appendix reference: None.

A7 Your company's products

Please complete **Section A – Company structure and operations**, subsection **A7.1 – Your company's products, Annex II**.

1. For the goods concerned please describe your company's Company Control Number (CCN) system. Please indicate how your own internal codes correspond to the PCNs provided in the section above on Product Control Numbers.

Production Unit	SAP Material Number	Comments
[Redacted – Confidential Production Facility Data]	*[Redacted – Confidential Product Designation]*	*[Redacted – Confidential Commercial Data]*.
[Redacted – Confidential Production Facility Data]	*[Redacted – Confidential Product Designation]*	
[Redacted – Confidential Production Facility Data]	*[Redacted – Confidential Product Designation]*	

Appendix reference:
Annex II, A7.1 – Your company's products

2. If your company does not use the same product codes across production, sales and invoicing please explain how they differ.

Answer: Not applicable. *[Redacted – Confidential Commercial Data]*.

Appendix reference:
Annex II, A7.1 – Your company's products

3. If there are differences in characteristics between your range of goods concerned and your like goods which cause distinguishable differences in price, explain those differences and the effect they have. Attach any evidence you have that is relevant. This could take the form of sales brochures, input costs, research papers or any other relevant documentation.

Answer: *[Redacted – Confidential Product Designation] represents [Redacted – Confidential Product Designation], which is a distinct* product category with differentiated technology and performance characteristics. *[Redacted – Confidential Product Designation]. [Redacted – Confidential Sales/Distribution Data] [Redacted – Confidential Product Designation] represents [Redacted – Confidential Product Designation], which [Redacted – Confidential Sales/Distribution Data]*	Appendix reference: Appendix A7.3 - Product Brochures

4. In relation to the technical, physical and other relevant factors, how are the products you export different from those produced in the UK. Please provide a general explanation here and complete the relevant sections of **Section A – Company structure and operations**, subsection **A7.1 – Your company's products, Annex II** where possible.

Answer: The products CPChem exports to the UK represent *[Redacted – Confidential Commercial Data]*.	Appendix reference: Annex II, A7.1 - Your company's products

5. For each type of the like goods sold on your domestic market and the goods concerned destined for consumption on the UK market, please provide a technical description as well as translated sales brochures. Please also provide information on:
   - technical characteristics
   - physical characteristics
   - any other important factors.

Answer: Technical Data Sheets are provided in Appendix A7.5.	Appendix reference: Appendix A7.5 - Technical Data Sheets

6. Describe all other goods produced or sold by your company in the UK, providing a name and description. If appropriate, please group them by type/range. Please complete **Section A – Company structure and operations, A7.2 – Other goods, Annex II**.

SECTION B:
Sales

Please coordinate the responses to each of the relevant sections in this questionnaire with your associated companies and ensure that the sales information for your associated companies to independent customers reconciles fully with the information given.

B1 Sales

1. Please complete **Section B – Sales, subsection B1.1 – Upwards sales reconciliation, Annex II**.

   Please see additional notes in the annex for assistance on how to complete it.

B2 Captive sales

If your company has sales of the like good / good concerned that are made between associated companies for further processing, transformation, or assembly (captive sales) please complete **Section B – Sales**, subsection **B2 – Captive sales**.

B3 Sales

1. Please describe your company's channels of distribution, highlighting any differences between the domestic market and exports to the UK.

Answer: CPChem primarily sells products through a combination of direct sales to end use customers and sales to distributors, depending on the market, customer requirements, and product application. *[Redacted – Confidential Sales Channel/Business Strategy Data]* All CPChem's exports to the UK fall into one of two categories: "direct sales" or "warehouse sales". *[Redacted – Confidential Sales Channel/Business Strategy Data]*
Appendix reference: None

2. Please explain how you have categorised customers in your sales data, highlighting any differences between the domestic market and exports to the UK.

Answer: *[Redacted – Confidential Customer Segmentation Methodology]*
Appendix reference: None

3. Please provide your terms of sale and pricing to each customer category (e.g., traders, distributors, wholesalers, industrial users, end users, etc.) including associated companies.

Answer: The company sells polyethylene products to a variety of customer types.*[Redacted – Confidential Pricing/Contracting Methodology]*
Appendix reference: None

4. Describe each step in the sales negotiation process, from the first contact with the customer up to and including any after-sale price adjustments (commissions, discounts, rebates and allowances). Please include a description of how the process varies for different customer categories.

Answer: The company's sales negotiation process generally follows the same framework for all customer categories, although commercial terms may vary depending on factors such as customer requirements, product specifications, application needs, credit risk, logistics requirements, market conditions, and the nature of the customer relationship. *[Redacted – Confidential Sales Negotiation Methodology]*
Appendix reference: None

5. Please describe in detail how the contracts, prices and quantities are agreed in accordance with sales made in long or short-term contracts. Describe the types of contracts applicable to the goods concerned, including the terms, price changes and renegotiation by either side, etc. Explain the requirements on either party, should the contract be terminated early.

Answer: Contracts and supply agreements are negotiated directly with customers and generally address product specifications, volumes, pricing, deliver terms, payment terms, and termination requirements. *[Redacted – Confidential Contracting Methodology]*
Appendix reference: None

6. Please explain production scheduling, such as whether production begins after the customers have established their product specifications (contract/order) and the sale has been made, or according to normal company production schedules.

Answer Production schedules are adjusted monthly based on a combination of forecasted demand, customer orders, inventory targets, and operational considerations.
Appendix reference: None

7. Provide copies of all price lists applicable during the POI for all customer types in the UK, including those used by associated companies. Explain your pricing procedure and whether sales prices differ between or among grades, types or specifications of the goods concerned or among customers, regions or time periods.

Answer: Prices and commercial terms are determined through individual negotiations and may differ based on the relevant commercial circumstances of each transaction.
Appendix reference: None

8. For all sales through associated companies, please provide a detailed description of how sales are made, detailing the procedure followed between time of order and delivery to the first independent customer. Please explain how the invoicing and payments are made.

Answer: Sales to customers in the UK are conducted through *[Redacted – Confidential Related-Entity Identification]*, which acts as the selling entity to independent customers in the UK. CPChem supplies product through intercompany sales arrangements with affiliated Chevron Phillips Chemical entities. through *[Redacted – Confidential Related-Entity Identification] is responsible* for customer invoicing and collection of payment from independent customers.

Two fulfilment models are used:

- **Direct Shipment (Drop Ship)**

[Redacted – Confidential Intercompany Sales/Distribution Structure].

- **Warehouse Replenishment Sales**

[Redacted – Confidential Intercompany Sales/Distribution Structure].

To summarise the following illustrates the flow for these two channels:
[Redacted – Confidential Intercompany Sales/Distribution Structure].

Appendix reference: Appendix B3.8 - Distribution Agreements Related Companies *[Confidential]*

B4 Sales Transactions

B4.1 UK Sales

In this part, you must provide complete information on sales of the goods concerned exported by your company to the UK during the POI.

1. Please provide the sales information for your company's sales to all customers in the UK in **Section B – Sales**, subsection **B3 – Sales to the UK, Annex II.** For instructions on filling out and explaining the adjustments for sales to the UK, please see **Section C**, subsection **C1 – Adjustments for export sales to the UK**.

   - Report each good sold on a given invoice with a different PCN (see Section A on Product Control Numbers) or invoice line, as a separate transaction. If there are any other sales costs, charges or expenses incurred which have not been identified in the table above, add a column for each item (see 'other factors'). For example, other particular selling expenses incurred.

   See Section C for further information on how to record adjustments in this table.

2. If your sales have not been made on a CIF basis, explain below how you have calculated the CIF values included in the 'CIF value in accounting currency' column in **Section B – Sales**, subsection **B3 – Sales to the UK, Annex II**.

Answer: *[Redacted – Confidential Pricing Methodology]*
Appendix reference: None

3. Please list any costs incurred by your associated companies which have been paid or reimbursed by your company, directly or indirectly linked with the goods concerned. In detail, explain the types of costs listed.

Answer: Not applicable.
Appendix reference: None

4. Select two invoices from two different customers regarding sales to the UK during the POI. Provide a complete set of documents for these sales. For example:
   - purchase order,
   - order acceptance,
   - commercial invoice,
   - applicable discounts or rebates,
   - credit/debit notes,
   - long or short-term contract of sale,
   - inland freight contract,
   - bank documents showing proof of payment,
   - details of any tax rebates, and
   - documents relating to transport at CIF or DDP.

Answer : The documents relating to the two selected invoices are provided in Appendix B4.1.4	
	Appendix reference: Appendix B4.1.4 - UK Transactions *[Confidential]*

B4.2 Domestic sales

In this part, you must provide complete information on sales of the like goods made by your company to independent and associated customers on the domestic market during the POI.

1. Please provide the sales information for your company's sales to all customers in US in **Section B – Sales**, subsection **B4 – Domestic sales, Annex II**. For instructions on filling out and explaining the adjustments for domestic sales, please see **Section C**, subsection **C2 – Adjustments for domestic sales** (below).

Report each goods sale on a given invoice with a different PCN (see Section A on Product Control Numbers) or invoice line as a separate transaction.
If there are any other sales costs, charges or expenses incurred which have not been identified in the table above, add a column for each item (see 'other factors'). For example, other particular selling expenses incurred.

See Section C for further information on how to record adjustments in this table.

2. Select two invoices from two different customers regarding sales to domestic customers during the POI. Provide a complete set of documents for these sales. For example:
   - purchase order,
   - order acceptance,
   - commercial invoice,
   - applicable discounts or rebates,
   - credit/debit notes,
   - long or short-term contract of sale,
   - inland freight contract, and
   - bank documents showing proof of payment.

Answer: The documents related to the two selected invoices are provided in Appendix B4.2.2
Appendix reference: Appendix B4.2.2 - US Transactions *[Confidential]*

B5 Currency conversions

To compare export sales prices with domestic sales prices, a conversion of currency will be required.

1. Please provide the actual exchange rates used by your company for converting the payment for export sales into your accounting currency during the POI.

Answer: The exchange rate table used directly within the company's SAP system are provided in Appendix B5.1.
Appendix reference: Appendix B5.1 – SAP Exchange Rate Monthly Table *[Confidential]*

B6 Sales to third countries

1. Please complete **Section B – Sales**, subsection **B6 – Export sales to third countries, Annex II** providing total sales, by destination country, for your like goods which are exported.

SECTION C:
Fair comparison

To do a fair comparison between the normal value and the export price, adjustments may be required. All adjustment claims will need to show how the factor concerned is one which affects price comparability.

To claim and evidence adjustments, the following sections request details on the adjustments that your company may claim and the information that should be provided and/or kept for verifying these claims.

This section is divided into subsections **C1 – Adjustments on export sales to the UK** and **C2 – Adjustments on domestic sales in the US**. Please complete those questions that relate to adjustments you wish to claim and report all charges in your accounting currency.

C1 Adjustments on export sales

Adjustments should be made for each transaction in the relevant columns of the transaction-by-transaction lists requested in **Section B – Sales**, subsection **B3 – Sales to the UK** of **Annex II**. The following questions relate to the adjustments provided in this annex. If they are not applicable then please state this in the relevant box.

1. Please detail your policy for granting discounts and rebates to customers in the UK and to third countries.

Answer: *[Redacted - Confidential Internal Process Data]*	
	Appendix reference: None

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

Answer: Rebate programs may be tied to contractual conditions and purchase commitments. *[Redacted – Confidential Pricing Methodology]*	
	Appendix reference: None

3. Please explain how you have quantified each of the charges included under transportation, insurance, handling, loading and ancillary costs. Identify the general ledger account(s) where each expense is recorded.

Answer: *[Redacted – Confidential Cost Allocation Methodology]*
Appendix reference: None

4. Credit refers to the cost of the time the buyer is given to pay for the goods, as typically agreed in the terms of payment. An adjustment is warranted when credit terms for export sales differ from the credit terms for domestic sales. A credit adjustment is to be made even if funds are not borrowed to finance the accounts receivable.

   Please explain how the interest rates are decided and the basis on which they are used.

Answer: Answer: When export sales receive longer payment terms, an adjustment may be made to reflect the financing benefit associated with the extended payment term. The interest rate is generally based on the company's short-term cost of funds or a market-based borrowing rate applicable during the period. For 2025, the applicable market-based benchmark (the Federal Reserve's 90-Day AA Nonfinancial Commercial Paper Interest Rate) averaged 4.16%. The adjustment is calculated using the difference in payment terms, the applicable interest rate, and the value of the sale. The objective is to measure the economic value of the additional credit provided, regardless of whether funds were borrowed to finance the receivable. A separate tab was added within Annex II to describe the different payment terms and show the calculation formula.
Appendix reference: None

5. For the reporting of:
   - Differences in after sales costs
   - Differences in commissions paid regarding sales under consideration
   - Any other adjustments made for differences not provided for in the above

Please state:

- What the basis of the adjustment is?
- How are the adjustments are reported?

Answer: Not applicable.

Appendix reference: None

C2 Adjustments on domestic sales

Adjustments are to be made for each transaction in the relevant columns of the transaction-by-transaction lists requested in **Section B – Sales**, **B4 – Domestic sales, Annex II**. All adjustments must be reported in your accounting currency.

1. Please describe in detail your policy for granting discounts and rebates to customers in your country.

Answer: *[Redacted – Confidential Pricing Methodology]*.
Appendix reference: None

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

AnswerRebate programs may be tied to contractual conditions and purchase commitments *[Redacted – Confidential Pricing Methodology]*.
Appendix reference: None

3. Please explain how you have quantified each of the charges included under domestic freight. Identify the general ledger account(s) where each expense is recorded.

AnswerCharges are quantified based on allocation of actual invoices, contracted freight rates / bill of material consumption. *[Redacted – Confidential Pricing Methodology]*.
Appendix reference: None

4. An adjustment can be made to take account of differences in physical characteristics between the goods sold in the UK and similar types sold in the domestic market.

Please provide a full explanation of each difference identified.

Answer: *[Redacted – Confidential Production Location Data]*.
Appendix reference: None

5. An adjustment can be made for differences in levels of trade where the export price (including a constructed export price) is:

- at a different level of trade from the normal value; and
- the difference has affected price comparability.

Please explain how you have calculated this adjustment.

Answer: *[Redacted – Confidential Level Of Trade Analysis]*.For completeness, CPChem's rules on transfer pricing are provided in Appendix C2.5, showing that internal transactions are at arm's length.
Appendix reference: Appendix C2.5 - Fair Comparison *[Confidential]*

6. Please explain the basis on which you calculated any adjustments to packing costs.

Answer: Charges are quantified based on allocation of actual packing service invoices, and bill of material consumption.
Appendix reference: None

7. For adjustments for import charges please do the following:

    - Provide original and English translations (where in another language) of statutes and regulations authorising duty drawback on exported goods and the governing methods used to calculate duty drawback.

Answer: Not applicable..The U.S. duty drawback program generally allows companies to recover certain customs duties, taxes, or fees paid on imported goods when those goods, or products manufactured from those goods, are subsequently exported. *[Redacted – Confidential Sourcing/Production Data]*.
Appendix reference: None

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

Answer: Not applicable. *[Redacted – Confidential Sourcing/Production Data]*.	
	Appendix reference: None.

9. Please explain the association between the amount received from the government when you export, and the amount paid for imported materials.

Answer: Not applicable. *[Redacted – Confidential Sourcing/Production Data]*.	
	Appendix reference: None

10. List all indirect taxes imposed on the products sold in the domestic market which were either rebated upon exportation or not collected on the products exported to the UK and to third countries.

Answer: *[Redacted – Confidential Tax Treatment Data]*	
	Appendix reference: None

- For each tax listed above, provide English translations of statutes and regulations authorising the collection of the tax, including documents explaining the method of calculation, assessment, and payment of the tax.

Answer: A copy of Chapter 151 of the Texan Tax Code is provided in Appendix C2.10.	
	Appendix reference: Appendix C2.10 – Texas Chapter 151 (Sales & Use Tax)

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

Answer: *[Redacted – Confidential Tax Rate Data]*. Please refer to Appendix C2.10.	
	Appendix reference: Appendix C2.10 – Texas Chapter 151 (Sales & Use Tax)

- Specify when you are legally obligated or liable for tax payment. Report when you actually paid taxes and whether you maintain separate accounts for these taxes.

Answer: is legally obligated and liable for tax collection when CPChem makes a sale of its product, and the customer does not claim some type of exemption on the order. CPChem files a monthly sales and use tax return with the State of Texas and pays any taxes collected in the preceding month; CPChem has a Sales Tax Payable Account.

Appendix reference: None

11. Credit refers to the cost of the time the buyer is given to pay for the goods, as typically agreed in the terms of payment. An adjustment is warranted when credit terms for export sales differ from the credit terms for domestic sales. A credit adjustment is to be made even if funds are not borrowed to finance the accounts receivable.

    Please explain how the interest rates are decided and the basis on which they are used.

Answer When export sales receive longer payment terms, an adjustment may be made to reflect the financing benefit associated with the extended payment term.

The interest rate is generally based on the company's short-term cost of funds or a market-based borrowing rate applicable during the period. For example, the Federal Reserve's 90-Day AA Nonfinancial Commercial Paper Interest Rate averaged 4.16% for 2025. The adjustment is calculated using the difference in payment terms, the applicable interest rate, and the value of the sale. The objective is to measure the economic value of the additional credit provided, regardless of whether funds were borrowed to finance the receivable..

Appendix reference: None

12. Please provide, for any after sales costs adjustment reported, the relevant sales contracts and how you calculated the expenses (for example, 'Warranty and Guarantee expenses' and 'Technical assistance and other services'), including the basis of any allocations. Include a record of expenses incurred. Technical services include costs for service, repair, or consultation. Where these expenses are closely related to the sales in question, an adjustment will be considered. Identify the ledger account where the expense is located.

Answer: *[Redacted – Confidential Pricing Structure Data]*

Appendix reference: None

13. If commissions paid to independent or associated sellers were reported explain the terms under which commissions are given.

Answer: Not Applicable. *[Redacted – Confidential Commercial Cost Data]*
Appendix reference: None

14. If an adjustment has been included for other factors not provided for above please provide a description of the adjustment, an explanation of why it has been included and the basis of its calculation.

Answer: Not applicable. *[Redacted – Confidential Commercial Cost Data]*
Appendix reference: None

SECTION D:
Costs and performance

D1 Turnover

1. Please complete **Section D – Costing Information**, subsection **D1 – Turnover, Annex II** by reporting your total sales after all discounts and excluding taxes, for the injury period.

   - If your company accounts are consolidated with accounts of associated companies, create a copy of the table to report **total group** turnover.
   - The total turnover must reconcile with the turnover in your financial reporting (accounts).

D2 Statement of profit and loss and other comprehensive income

1. Complete **Section D – Costing information, subsection D2 – Income statement, Annex II** with information about all the goods your company produces, for the injury period.

2. Please attach copies of your (corporate) income tax statements, any other company tax statements and the corresponding tax returns for the POI and the preceding three financial years.

Answer: CPChem's provided a description of the tax situation applicable to such company and extracts from its mother company's consolidated statements regarding tax liability, in Appendix D2.2.

Appendix reference: Appendix D2.2 – Tax Statements *[Confidential]*

D3 Production

1. Please provide a description of your company's production facilities. List all facilities involved in the production process, explaining the production activities at the major facilities and whether any stages are subcontracted.

[Redacted – Confidential Production Facility Data]	*[Redacted – Confidential Process Technology Data]*
[Redacted – Confidential Production Facility Data]	
[Redacted – Confidential Production Facility Data]	*[Redacted – Confidential Process Technology Data]*

Appendix reference: None

2. Describe each stage of the production process of the goods concerned as produced and sold by your company. To support this, please attach a complete flowchart of the production cycle.

Answer: Polyethylene resin is produced by polymerizing ethylene, together with any required comonomers (*[Redacted – Confidential Process Technology Data] for goods* concerned), in the presence of a catalyst system. Depending on the manufacturing facility, polymerization occurs using *[Redacted – Confidential Process Technology Data] or* [Redacted – Confidential Process Technology Data] [Redacted – Confidential Process Technology Data]

Appendix reference:
Appendix D3.2 - Production Process *[Confidential]*

3. Describe the main inputs to the production process and whether the supplier is associated or not. Specify whether these input materials or parts were imported, and whether the input value includes import charges and indirect taxes (for both exported and domestic types).

[Redacted – Confidential Process/Input Technology Data]

Appendix reference: None

4. List any products produced by your company in the same facilities as the goods concerned and/or like goods, and comment on your ability to switch production.

AnswerThe facilities are capable of producing multiple polyethylene grades within the design limits of their respective process technologies, including High-Density Polyethylene (HDPE), Linear Low-Density Polyethylene (LLDPE), and Metallocene Linear Low-Density Polyethylene (mLLDPE).

Appendix reference: None

D4 Upwards cost reconciliation

1. Complete **Section D – Costing information,** subsection **D4 – Upwards cost reconciliation, Annex II.**

Please see additional notes in the annex for assistance on how to complete it

D5 Capacity

1. Complete **Section D – Costing information,** subsection **D5 – Capacity, Annex II**.

Explain your calculation of the capacity and the capacity utilisation for the goods concerned. What is the basis for calculating your capacity? (For example, number of shifts, working days per year, name plate versus actual capacity, idle time for machinery maintenance and changes in the production process etc.)

Answer: Production capacity is defined as annual throughput representing the process's demonstrated short-term capability. This figure may not reflect an achievable or sustainable production rate. It is calculated by dividing the best calendar month of actual production by the number of days in that month and multiplying by 365. In other words, it represents the best-ever monthly daily production rate, annualised, for the goods concerned. *[Redacted – Confidential Production Capacity Calculation Methodology]*
Appendix reference: None

D6 Stocks

1. Complete **Section D – Costing information, D6 – Stocks, Annex II.** Explain the difference between your own production and purchased goods.

Answer: *[Redacted – Confidential Inventory Composition Data]*
Appendix reference: Annex D6 - Stocks *[Confidential]*

2. Please comment on the level and trend of stocks that you have reported above.

Answer: *[Redacted – Confidential Inventory/Stock Data]*
Appendix reference:

none

D7 Joint products and by-products

1. Please explain any waste, scrap or by-products related to the production of the goods concerned and the like goods. Please explain:
   - how you differentiate your waste, scrap, and by-products.
   - what you do with your waste, scrap, and by-products.
   - how any income or cost from waste, scrap, and by-products is recorded
   - the average waste, scrap, and by-product ratio resulting from the production process of the goods concerned and like goods.

Answer: Polyethylene manufacturing is a continuous process designed to maximize product yield and minimize the generation of waste. During normal operations, small quantities of off specification material, transition material associated with product grade melt index and density changes, and other product losses may be generated. CPChem generally categorizes products into three broad categories of scrap, off spec, and prime (i.e., the product that can be sold).

- *[Redacted – Confidential Production Classification Methodology] [Redacted – Confidential Commercial Relationships]*
- *[Redacted – Confidential Production Classification Methodology]*, and *[Redacted – Confidential Commercial Relationships]*. The company seeks to minimize scrap and off spec production through controls and continuous improvement efforts. *[Redacted – Confidential Cost/Accounting Treatment]*.

[Redacted – Confidential Production Classification Methodology]

Appendix reference: None

2. Please identify any products which share a joint process with the goods concerned and/or the like goods which you produce. Please indicate at which point in the manufacturing process the products diverge.

Answer: *[Redacted – Confidential Production Facility Data]*.

[Redacted – Confidential Process/Product Differentiation Methodology].

Appendix reference: None

3. Please explain how your costs of production (per unit) differ between the goods concerned and/or the like goods and its joint products, if any, at the point of

divergence. Comment on the reason for this difference and explain your method(s) of calculation.

Answer: *[Redacted – Confidential Cost Structure/Methodology]*	
	Appendix reference: None

D8 Purchases

1. Please complete **Section D – Costing information,** subsection **D8 – Purchases, Annex II**, showing purchases by total value exclusive of VAT and net of credit notes and trade discounts (discounts immediately deducted on the invoice) received from suppliers.

2. Within your company, do you use any integrated processes in the production of the goods concerned? If so, please explain.

Answer: *[Redacted – Confidential Sourcing Structure]*.	
	Appendix reference: None

D9 Profitability

1. Please complete **Section D – Costing information,** subsection **D9 – Profitability, Annex II**.

2. Please explain how you calculate profitability for the goods concerned/like goods, referring to your accounting and bookkeeping methods. Attach a breakdown to show how you have calculated the figures in **D9 – Profitability**.

Answer *[Redacted – Confidential Profitability Methodology]*. Please refer to CPChem's audited financial statements provided in Appendix A6.6.	
	Appendix reference: Appendix A6.3 – Audited Financials *[Confidential]* and Appendix A6.6 – Income statements *[Confidential]*

D10 Cost to make (CTM) in the US

1. Please provide the CTM for your domestic market (US) by completing **Section D – Costing information**, subsection **D10.1 – CTM in US**
   - Provide details for each PCN of your goods during the POI, produced by your company or an associated party.
   - For each associated party, make a new copy and complete the spreadsheet annex separately.
   - Note that subheadings of each line item (e.g. raw materials, energy) can be changed to suit the categorisation of your own cost accounting system.

2. If there are differences in production costs for the same PCN between your like goods and the goods concerned, explain the reasons for the differences.

Answer: *[Redacted – Confidential Cost Structure]*	
	Appendix reference: None

3. Please state the cost allocation method for each cost subheading used to allocate costs against individual PCNs (e.g. units, tonnes, labour hours etc)

Answer: *[Redacted – Confidential Cost Allocation Method]*	
	Appendix reference: None

4. Please state if there were any major changes within the POI in input prices. If so, please provide details for each of the relevant PCNs.

Answer: *[Redacted – Confidential Input Pricing Trend Data]*	
	Appendix reference: None

5. Please state if there were any major changes to your pricing structure during the POI. If so, please provide details of the price structure (sales prices, discounts etc…) for each of the relevant PCNs.

Answer: *[Redacted – Confidential Cost Structure]*	
	Appendix reference: None

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

Answer: *[Redacted – Confidential Cost Structure]*	
	Appendix reference: None

7. Please explain how you finance your production of like goods, your sources of finance, whether there is any cost of finance associated with the production of like goods, and how you have reported this in the cost to make figures and company accounts.

Answer: *[Redacted – Confidential Financial Structure Data]*	
	Appendix reference: None

D11 AS&G in the US Administration, Selling & General costs

1. Please provide AS&G costs for the like goods produced for your domestic market by completing **Section D – Costing information**, subsections **D11.1 – AS&G in domestic market**.

   - Provide details for each cost type of goods produced during the POI, by your company or an associated party.
   - Note that subheadings of each line item (e.g., sales commissions, supply and client) must be changed to suit the categorisation of your own cost accounting system.

2. Please explain the cost allocation and apportion method used for each cost type for the POI, including an explanation of that allocation and apportion method under each cost type.

Answer: *[Redacted – Confidential Cost Allocation Method]*	
	Appendix reference: None

3. If there are differences in costs for the same cost type between your goods concerned and like goods explain the reasons for the differences.

Answer: *[Redacted – Confidential Cost Structure]*	
	Appendix reference: None

D12 Raw material (RM) and major input purchases

1. Please complete **Section D – Costing information**, subsection **D12 – RM and input purchased, Annex II** detailing the RM and major input purchases

Please provide an invoice and any supporting documents for two of your purchases stated within D12. Use the box below to give an overview of any supporting documents provided.

Answer: The requested documents are provided in Appendix D12.1.	
	Appendix reference: Appendix D12.1 - RM Reference *[Confidential]*

2. If you purchase materials or inputs from associated suppliers, please provide information about how prices are set, the negotiation process on price setting; and any contracts or evidence of price negotiation. Also, in addition to the 'Cost to make (CTM)' sheets for Domestic sales (D10.1), please provide the cost to make of the material by the associated suppliers on the same basis by adding in a column to the 'raw materials and input purchases' sheet (D12), labelling it as 'Associated supplier CTM'.

Answer: *[Redacted – Confidential Procurement Policy]*	
	Appendix reference: None

3. For material costs purchased from independent companies, explain the nature of contractual arrangements. State whether the material costs include transportation charges, duties and other expenses normally associated with obtaining the materials used in production.

Answer: *[Redacted – Confidential Cost Structure Data]*	
	Appendix reference: None

D13 Direct labour

1. Please complete **Annex D13 – Direct labour**, detailing the monthly direct labour costs per PCN for the like goods during the POI by your company.

SECTION E:
Other questions

Please note that all questions in this section are optional. If you choose not to provide information to a question in this section, please state this or write 'N/A' in the respective text box.

1. Please indicate any other factors which might have caused the injury to the UK industry, for example:
   - volume and prices of imports not sold at dumped prices.
   - contraction in demand or changes in patterns of consumption.
   - restrictive trade practices of, and competition between, third country and UK producers.
   - developments in technology; and
   - export performance and the productivity of the UK.

Answer: CPChem believes that any assessment of injury should consider all relevant market factors and not attribute changes in the conditions of the UK industry solely to imports from the countries under investigation.

Several factors have likely influenced market conditions during the period under review including but not limited to product differentiation and customer requirements, technical developments, and business specific factors affecting producers. The goods concerned supplied by CPChem include metallocene based polyethylene products that offer distinct technological, processing, and performance characteristics. These products are designed to satisfy specific customer requirements and applications that may differ from those served by products manufactured by certain UK producers. As a result, competitive dynamics may be influenced by differences in product capabilities, application requirements, and customer preferences rather than price alone. Advancements in catalyst technologies, resin design, manufacturing processes, and end use performance requirements can also affect customer purchasing patterns and competitive positioning. Demand for more differentiated products may increase as converters seek improved processing efficiency, downgauging opportunities, enhanced mechanical properties, or other performance benefits. Finally, *[Redacted – Confidential Business Strategy Data]*.

To the extent UK customers selected these products, such decisions may have been driven by technical requirements, product performance, manufacturing efficiency, or end-use application needs. These factors should be considered when evaluating the

causes of any alleged injury and the extent to which imports may have affected the condition of the UK industry.
Appendix reference: None

2. Please describe how you would expect the implementation of a trade remedy to affect :
   - your exports of the goods concerned to the UK
   - market price of the goods in the UK.

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

Answer: The proposed trade remedy would likely increase market prices and reduce access to specialized polyethylene products that UK converters rely upon to meet specific processing, performance, and sustainability requirements. Because these products are not always substitutable with domestic alternatives, converters may face higher raw material costs, reduced operational efficiency, and limitations in delivering the performance demanded by end users. Furthermore, many of these products enable innovations in downgauging and advanced product formulations that reduce material consumption while maintaining or improving end-use performance. Restricting access to these technologies could impede sustainability initiatives, slow the development of more resource-efficient packaging and film structures, and reduce the ability of UK converters to compete effectively in both domestic and international markets. As a result, the measure risks increasing costs throughout the value chain while reducing choice, innovation, and the competitiveness of UK downstream manufacturers.
Appendix reference: None

SECTION G:
Checklist and appendices

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A – Company structure and operations	Yes
Section B – Sales	Yes
Section C – Fair comparison	Yes
Section D – Costing information	Yes
Section E – Other questions	Yes
Section F – Declaration	Yes

Please list any appendices that you have referenced throughout and are attaching along with this questionnaire.

Certain information, annexes, and appendices in this Quarterly Report have been redacted because they contain confidential business information whose disclosure to third parties could prejudice CPChem. Where possible, a meaningful summary has been provided in place of the redacted content.

Appendix reference (Folder Name)	**Document title**	**File Qty**
Appendix A1.2 – LoA	Appendix A1.2 - LoA	1
Appendix A2.3 – UK REACH Registration	*[Confidential]*	2
Appendix A2.4 – International Production Standard	*[Confidential]*	3

Appendix A3.2 – - Structure Charts	*[Confidential]*	2
Appendix A4.3 - Organizational Documents	*[Confidential]*	3
Appendix A5.1 - Contracts	*[Confidential]*	7
Appendix A6.3 - Audited Financials	*[Confidential]*	4
Appendix A6.5 - Trial Balance	*[Confidential]*	2
Appendix A6.6 - Income statements	*[Confidential]*	2
Appendix A6.8 - Accounting Policies	*[Confidential]*	4
Appendix A7.3 - Product Brochures	Appendix A7.3.1 - Marlex Film, Extrusion Coating & Geomembrane Appendix A7.3.2 - Marlex Metollocene Appendix A7.3.3 - Premium Extrusion Rigid Packaging	3
Appendix A7.5 - Technical Data Sheets	Appendix A7.5.1 - TDS – Marlex_7109L Appendix A7.5.2 -TDS – Marlex_7308K Appendix A7.5.3 - TDS – Marlex_7104 Appendix A7.5.4 - TDS – Marlex_7105 Appendix A7.5.5 - TDS – Marlex_7109 Appendix A7.5.6 - TDS – Marlex_7109M	26

	Appendix A7.5.7 - TDS – Marlex_7120X Appendix A7.5.8 - TDS – Marlex_7308DK-P01 Appendix A7.5.9 - TDS – Marlex_D139DK-N Appendix A7.5.10 - TDS – Marlex_D139FJ-P01 Appendix A7.5.11 - TDS – Marlex_D139FK Appendix A7.5.12 - TDS – Marlex_D139FK-P01 Appendix A7.5.13 - TDS – Marlex_D139-N Appendix A7.5.14 - TDS – Marlex_D139-P01 Appendix A7.5.15 - TDS – Marlex_D143FK Appendix A7.5.16 - TDS – Marlex_D143FK-P01 Appendix A7.5.17 - TDS – Marlex_D143-N Appendix A7.5.18 - TDS – Marlex_D143-P01 Appendix A7.5.19 - TDS – Marlex_D163-N Appendix A7.5.20 - TDS – Marlex_D163-P01 Appendix A7.5.21 - TDS – Marlex_D170DK-N Appendix A7.5.22 - TDS – Marlex_D173 Appendix A7.5.23 - TDS – Marlex_D174 Appendix A7.5.24 - TDS – Marlex_D350 Appendix A7.5.25 - TDS – Marlex_D350-N Appendix A7.5.26 - TDS – Marlex_D350-P01	
Appendix B3.8 - Distribution Agreements Related Companies	*[Confidential]*	8
Appendix B4.1.4 - UK Transactions	*[Confidential]*	6
Appendix B4.2.2 - US Transactions	*[Confidential]*	6
Appendix B5.1 - SAP Exchange Rate Monthly Table	*[Confidential]*	1
Appendix C2.5 - Fair Comparison	*[Confidential]*	2
Appendix C2.10 - Texas Chapter 151 (Sales & Use Tax)	Appendix C2.10 - Texas Chapter 151	1

Appendix C4.1 - US Interest Rate for borrowing companies	Appendix C4.1 - US Interest Rate for borrowing companies	1
Appendix D2.2 - Tax Statements	*[Confidential]*	2
Appendix D3.2 - Production Process	*[Confidential]*	2
Appendix D6 - Stocks	*[Confidential]*	4
Appendix D12.1 - RM Reference	*[Confidential]*	1