Annex I: Questionnaire for associated companies involved in sales or marketing of the goods

Guidance

This annex is an essential part of the questionnaire and is intended for companies which are associated with the exporting producer, and which are **not involved in producing** the goods concerned but **are involved in the sale or export** of the goods to the UK. All the general instructions, deadlines and guidance given in this questionnaire are directly applicable to this annex. Each associated company involved should complete this annex separately.

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

The questionnaire is divided into three parts:
Section I – Associated company information
Section II – Information relating to purchase prices and stocks
Section III – Information relating to resale prices

Related persons

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

Section I of Annex I: Associated company information

S1.1 – Identity and contact details

1. Please describe the activities carried out by your company. In your description explain the range of products sold, markets sold to, functions performed, your relationship with the associated company and any other relevant factors.

Answer: Chevron Phillips Chemicals International N.V. (***CPCI***) is the principal EMEA operating entity of Chevron Phillips Chemical Company LP (***CPChem***). CPCI is engaged in the manufacture, processing, storage, sale, transportation and distribution of chemical products derived from petroleum and other raw materials. CPCI sells across CPChem's European product lines, organised through business units and corporate functions including *[Redacted – Commercially sensitive information]*. It operates *[Redacted – Commercially sensitive information].* CPCI does not produce the goods concerned. It is appointed as a non-exclusive distributor of *[Redacted – Commercially sensitive information],* and purchases and resells the goods concerned in its own name as an independent contractor. CPCI performs the trading, logistics and inventory management functions for the European region; this structure is not specific to the goods concerned. CPCI sells the goods concerned to *[Redacted – Commercially sensitive information].* Goods destined for the UK market are held in a warehouse under CPCI's customs supervision arrangements and remain owned by CPCI until resale. CPCI does not own the warehouse. CPCI did not make any sales of the goods concerned to independent customers in the UK during the POI.
Appendix reference: None

2. Please complete the table below.

Legal name of company:	Chevron Phillips Chemicals International N.V.
Legal structure (e.g., <limited company, sole trader, partnership> etc):	Company limited by shares
Year of establishment:	1978
Other operating names:	CPChem
Name (point of contact):	*[Redacted – Contains personal information]*
Position:	*[Redacted – Contains personal information]*

Address:	Leonardo da Vincilaan 19, 1831, Diegem, Belgium
Telephone No:	*[Redacted – Contains personal information]*
Email:	*[Redacted – Contains personal information]*
Website:	www.cpchem.com

3. 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:	Van Bael & Bellis
Address:	Chaussée de La Hulpe 166, 1170 Brussels, Belgium
Telephone No.:	*[Redacted – Contains personal information]*
Email:	*[Redacted – Contains personal information]*
Confirm they have signed authority to act (Yes/No):	Yes – the LoA is attached to CPChem's questionnaire
	Appendix reference: None

S1.2 – About your company

1. Please provide the details of any other operating name you use to sell or market the goods concerned.

Answer: CPCI purchases the goods concerned from *[Redacted – Commercially sensitive information* and sells such goods to *[Redacted – Commercially sensitive information*, which resells them to independent customers in the UK in its own name. CPCI does not make any direct sales to customers in the UK.
Appendix reference: None

2. Please provide a list of all your company's shareholders that owned more than 5% of its shares during the period of investigation (POI, 1 January 2025 to 31 December 2025) in **S1.2.1 – Shareholders** in **Annex I (Associated companies – Exporter)**. Where known, please give details of their activities in the table.

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

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

Answer: CPCI is a Belgian company limited by shares, headquartered at Airport Plaza – Stockholm Building, Leonardo Da Vincilaan 19, 1831 Diegem, Belgium. It is CPChem's principal EMEA operating entity, engaged in the manufacture, processing, storage, sale, transportation and distribution of chemical products derived from petroleum and other raw materials. CPCI operates under a Managing Director, EMEA Region, through business units and corporate functions including *[Redacted – Commercially sensitive information]*. CPCI operates *[Redacted – Commercially sensitive information]*.
Appendix reference: None

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

Answer: CPCI is *[Redacted – Commercially sensitive information regarding the shareholders and the level of shares]*. Please refer to CPChem's response for further details.
Appendix reference: Appendix S1.2.5 – Global Company Organisation *[Confidential]*

S1.3 – Accounting practices

1. 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: CPCI's financial year runs from 1 January to 31 December.
Appendix reference: None

2. Please attach copies of your audited accounts for the injury period, 1 January 2022 to 31 December 2025. This may include a statement of financial position; statement of profit and loss and other comprehensive income; statement of changes in equity; cash-flow statement; notes to the accounts and all reports; and the auditor's opinion on these documents.

Answer: The audited accounts of CPCI for the years 2023, 2024 and 2025 and of Chevron Phillips Chemical Company LLC (CPCI's indirect parent company) for the years 2022, 2023, 2024 and 2025 are provided in Appendices S1.3.2.1 to S1.3.2.7*[Confidential]*. CPCI's financial year 2022 figures are reported as prior-year comparatives in its 2023 audited accounts.
Appendix reference: Appendix S1.3.2 – Audited Accounts *[Confidentia]*

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

Answer: Not applicable.
Appendix reference: None

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

Answer: Not applicable.
Appendix reference: None

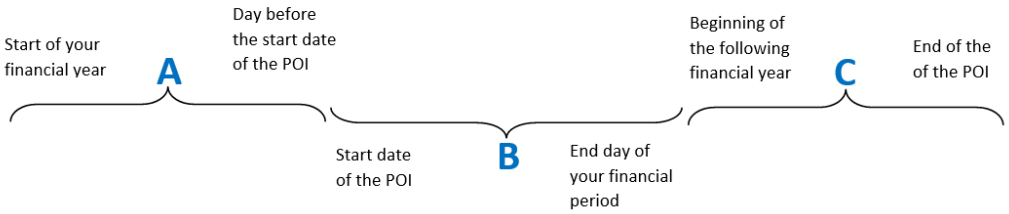
5. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI 1 January 2022 to 31 December 2025. If your financial year is fully aligned with the POI, this is all that is required.

   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 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 CPCI's trial balance covering the POI is provided in Appendices S1.3.5.1 to S1.3.5.2 *[Confidential]*.
Appendix reference: Appendix S1.3.5 – Trial Balance *[Confidential]*

S1.4 – Employment and turnover

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

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

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

S2.1 – Purchases and stocks

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

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

Answer: CPCI purchases the goods concerned exclusively from *[Redacted – Commercially sensitive information]*. CPCI does not purchase the goods concerned from any unrelated supplier. Purchases are governed by *[Redacted – Commercially sensitive information]*. The relationship between the parties is that of seller and buyer, each acting as an independent contractor. A copy of the agreement and the relevant amendment is provided at the appendix reference below. *[Redacted – Commercially sensitive information regarding the determination of the price, the terms of payment and other contractual obligations].*

Appendix reference: Appendix S2.1.1 – Distribution Agreements *[Confidential]*

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

Answer: The goods concerned are manufactured by *[Redacted – Commercially sensitive information]*. All material sold to the UK during the POI was mLLDPE produced at *[Redacted – Commercially sensitive information regarding the plants].*

[Redacted – Commercially sensitive information regarding the production process].

The goods are shipped by *[Redacted – Commercially sensitive information regarding delivery].* On arrival, the goods are moved to a warehouse, where they are stored under CPCI's customs supervision arrangements and remain owned by CPCI.

[Redacted – Commercially sensitive information regarding the customs office].

Appendix reference: None

3. Please list all locations where your company keeps stocks of the goods concerned.

Answer: CPCI holds stocks of the goods concerned in third party warehouses serving the EMEA region. CPCI does not own the warehouses; the inventory is owned by CPCI while held in storage.

Stock of the goods concerned destined for the UK market is held at *[Redacted – Commercially sensitive information regarding the location of the warehouses].*

Appendix reference:
None

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

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

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

Section III of Annex I: Information relating to resale prices

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

S3.1 – General information

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

Answer: The goods concerned are manufactured by *[Redacted – Commercially sensitive information* and shipped by *[Redacted – Commercially sensitive information]*, where they are held at a third-party warehouse under CPCI's customs supervision arrangements. CPCI does not physically alter the goods; they are purchased and resold in the same form. *[Redacted – Commercially sensitive information].* *[Redacted – Commercially sensitive information regarding the financial flows]*. The resulting channel for the goods concerned is: *[Redacted – Commercially sensitive information]*.
Appendix reference: None

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

Answer: For the goods concerned, CPCI sold to a single customer category during the POI: *[Redacted – Commercially sensitive information].* CPCI made no sales of the goods concerned to traders, distributors, wholesalers, industrial users or end users in the UK. Terms of sale and pricing between CPCI and *[Redacted – Commercially sensitive information]* are governed by *[Redacted – Commercially sensitive information regarding terms of sale and pricing].* The sale from CPCI to *[Redacted – Commercially sensitive information]* takes place *[Redacted – Commercially sensitive information regarding terms of sale and delivery]*.
Appendix reference:

Appendix S3.1 - Terms of sale and pricing *[Confidential]*

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

Answer: CPCI does not physically alter the goods concerned. The material is purchased and resold in the same form.
Appendix reference: None

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

Answer: During the POI, CPCI's only sales of the goods concerned for consumption in the UK were made to *[Redacted – Commercially sensitive information].* CPCI therefore does not conduct a customer facing sales negotiation process in respect of the goods concerned. The independent UK customer places its order with *[Redacted – Commercially sensitive information]. [Redacted – Commercially sensitive information regarding the sales negotiation process].*
Appendix reference: None

5. Explain how sales prices are set and whether sales prices differ between or among grades, types or specifications of the goods concerned or among customers, regions or time periods.

Answer: *[Redacted – Commercially sensitive information regarding sales price].*
Appendix reference: None

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

Answer: Not applicable. *[Redacted – Commercially sensitive information regarding sales price].*
Appendix reference: None

S3.2 – Sales to independent customers in the UK during the POI

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

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

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

Answer: Not applicable. *[Redacted – Commercially sensitive information]*. Accordingly, no CIF value has been calculated for this table.
Appendix reference: None

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

S3.3 – Sales to associated parties in the UK during the POI

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

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

1. Please complete **S3.3 – Sales to associated parties** in the spreadsheet **Annex I (Associated companies – Exporter)** provided. Show all sales of the goods concerned made by your company to associated customers for consumption in the UK on a transaction-by-transaction basis.

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

Answer: Not applicable. CPCI's sales of the goods concerned to [*Redacted – Commercially sensitive information regarding the delivery terms]*.
Appendix reference: None

S3.4 – Selling costs

1. Please complete **Annex S3.4 – Selling costs** in the spreadsheet **Annex I (Associated companies – Exporter)** provided. Please provide the requested information for the goods you sold on the UK market during the POI.

LIST OF APPENDICES

Appendix reference (Folder Name)	Document title	File Qty
Appendix S1.2.5 – Global Company Organisation	*[Confidential – Not subject to any meaningful summary]*	2
Appendix S1.3.2 – Audited Accounts	*[Confidential – Not subject to any meaningful summary]*	10
Appendix S1.3.5 - Trial Balance	*[Confidential – Not subject to any meaningful summary]*	6
Appendix S2.1.1 - Distribution Agreements	*[Confidential – Not subject to any meaningful summary]*	5
Appendix S3.1.2 – Terms of sale and pricing	*[Confidential – Not subject to any meaningful summary]*	1