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:	ExxonMobil Product Solutions Company, a division of Exxon Mobil Corporation (hereafter "EMPSC").

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.

As per our separate e-mail exchange, Respondents are available during the week of October 12 for the verification.
Appendix reference: Not applicable

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.

Preliminary comments

Responses that apply equally to all ExxonMobil affiliates involved in AD0091 have been included in the response for ExxonMobil Product Solutions Company ("EMPSC"). Where responses differ for specific ExxonMobil affiliates, they have been included in the questionnaire for the concerned affiliate.

As per the work process agreed with the TRA, [Redacted – commercially sensitive intercompany arrangement].

The ExxonMobil entities submitting responses to the questionnaire, are jointly referred to as "Respondents".

The Respondents note that the Notice of Initiation does not contain a definition of linear low-density polyethylene ("LLDPE"). Furthermore, the notice of Initiation includes HS codes which cover not only LLDPE but also other goods. As set out in the registration form, conventional LLDPE grades typically possess densities ranging from 0.91 to 0.94 g/cm³. Accordingly, this is the criterion that has been applied by the Respondents for the purpose of the questionnaire.

[Redacted – commercially sensitive commercial terms]

Please note that the information provided herein sets out Respondents' best understanding at the time of writing, based on information available at this stage. Respondents reserve their right to update and/or expand the information in future stages of the investigation as appropriate.

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.

a. Characteristics such as melt index, density, additive concentrations are important considerations for customers when purchasing LLDPE resins and can impact significantly different properties that impact end-use applications and corresponding price structure. There is also further differentiating between catalysts within one particular type – for example, different resins produced with varying metallocene catalysts will perform very differently in the field and command different price premiums despite all falling under the common "metallocene" umbrella.

b. It is also worth noting that in publicly available statements attributable to Applicant, Applicant itself treats its (Ziegler-Natta) C6 LLDPE as a differentiated product occupying a distinct (higher-performance) segment from C4 LLDPE.
In its brochure, Applicant itself distinguishes C6 from C4 LLDPE as "distinctive and unique" with "superior" properties of toughness, reduced neck-in and better stretchability that C4 cannot match without additional thickness. (p4 and 9 of Ineos' brochure "Your partner in Hexene (C6) LLDPE film", © INEOS Olefins & Polymers Europe, September 2019).

Appendix reference:
Appendix_Scope_NonConfidential_EMPSC_IneosbrochureC6LLDPE.F

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.

The PCN structure does not fully capture the various technical and physical characteristics of various LLDPE resins and allows more broadly commoditized resins to be categorized in a similar fashion to much more advanced resins with enhanced properties.

Appendix reference: Not applicable

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.

Comonomer concentrations are adjusted to control for density. Additive concentrations added during the extrusion process will impart different properties to the finished resin. Differences in properties of the specific catalyst used in the process will further differentiate resins. Multi-reactor setups in series can also influence finished product qualities.
Appendix reference: Not applicable

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:	ExxonMobil Product Solutions Company, a division of Exxon Mobil Corporation (hereafter "EMPSC").
Legal structure (e.g., limited company, sole trader, partnership etc)	Exxon Mobil Corporation ("EMC") is a New Jersey corporation. EMPSC is an unincorporated division of Exxon Mobil Corporation in the US.
Year of establishment:	[Redacted – commercially sensitive organisational information]
Other operating names:	Not applicable.
Company registration number:	3793794100.
Place of registration:	New Jersey, US
Name (point of contact):	[Redacted – contains personal information]
Position:	[Redacted – contains personal information]
Address:	[Redacted – contains personal contact information]
Telephone No:	[Redacted – contains personal contact information]
Email:	[Redacted – contains personal contact information]
Website:	www.exxonmobil.com www.exxonmobilchemical.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:	Van Bael & Bellis
Address:	Belgium office: Chaussée de La Hulpe 166, 1170 Brussels, Belgium

	UK office: Holborn Gate, 330 High Holborn London WC1V 7QH United Kingdom
Telephone No.:	[Redacted – contains personal contact information]
Email:	[Redacted – contains personal contact information]
Confirm they have signed authority to act (Yes/No):	Yes. The authorization letters were provided previously as part of the registration form.
	Appendix reference: Not applicable

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.

Exxon Mobil Corporation, acting through its division EMPSC, is a producer of LLDPE. [Redacted – commercially sensitive production and organisational information]
Appendix reference: Not applicable

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.

Date	Legal form	Explanation of change
		Same corporate form; no changes. EMPSC as a division was established in May 1, 2022. For clarification, prior to May 1, 2022, the chemical business of Exxon Mobil Corporation was carried out under a division called “ExxonMobil Chemical Company”. That division has been dissolved and effective May 1, 2022 EMPSC is the new division that carries out the chemical business of Exxon Mobil Corporation. For clarification, all these are

		under the same corporate entity i.e. Exxon Mobil Corporation. Remark: some appendices provided may still refer to "ExxonMobil Chemical Company"

+Add additional rows as required.

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.

No specific authorization requirements or restrictions apply, other than certain environmental permits.
Appendix reference: Not applicable

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

[Redacted – commercially sensitive quality system information]
Appendix reference: Not applicable

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.

EMPSC does not belong to a representative organization specifically covering the goods concerned. However, ExxonMobil participates in a variety of representative organisations relating to its wide portfolio of activities, such as: Industrial Packaging Alliance of North America (IPANA); American Chemistry Council (ACC); American Fuel and Petrochemical Manufacturers (AFPM) (Formerly National Petrochemical and Refiners Association (NPRA)); American Oil Chemists' Society; American Oil Chemists' Society, Chemical Fabrics and Films Association – US.
Appendix reference: Not Applicable

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.

Please refer to the diagram in appendix. Please also refer to the responses to questions A.1.1 and A.2.1.

Appendix reference: Appendix_A.3.2_[Redacted – confidential appendix reference]

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

Please refer to the relevant section in Annex II.

Appendix reference: Not applicable

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

As EMPSC is an unincorporated division of Exxon Mobil Corporation, and the Board is technically the Board of Exxon Mobil Corporation, the description below is for Exxon Mobil Corporation. The Board of Directors appoints various committees to help carry out its duties. One of the committees is the Nominating and Governance Committee ("Committee"). [Redacted – commercially sensitive corporate governance information]
Appendix reference: Not applicable

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.

EMPSC is an unincorporated division of Exxon Mobil Corporation. [Redacted – commercially sensitive corporate governance information] There is no requirement to have a business license in the US to sell LLDPE.
Appendix reference: Appendix_A.4.2.3.a_[Redacted – confidential appendix reference] Appendix_A.4.2.3.b_[Redacted – confidential appendix reference] Appendix_A.4.2.3.c_[Redacted – confidential appendix reference]

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.

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix number of contract
[Redacted – commercially sensitive organisational information]	Redacted – commercially sensitive supply chain information]	Redacted – commercially sensitive business information]	Redacted – confidential appendix reference
		Appendix reference: Appendix_A.5.1.a_[Redacted – confidential appendix reference] Appendix_A.5.1.b_[Redacted – confidential appendix reference]	

+Add additional rows as required.

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.

EMPSC keeps all its records electronically.

Records address	What records are held?
Not applicable.	Not applicable.

+Add additional rows as required

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.

The corporate financial accounting period of Exxon Mobil Corporation is from 1st January to 31st December. Exxon Mobil Corporation's accounting practices and audited accounts at group level are prepared in accordance with USA GAAP.
Appendix reference: Not Applicable

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.

EMPSC does not have audited accounts. For the (group) consolidated financial statements of the associated entity, EMPC, please refer to EMPC's response in Annex I to the corresponding question.
Appendix reference: Not applicable

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

This is not applicable to EMPSC.
Appendix reference: Not applicable

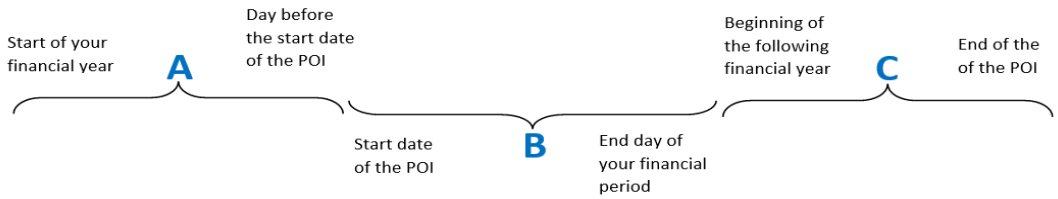
5. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI 1 January 2025 to 31 December 2025. If your financial year is fully aligned with the POI, this is all that is required.

   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.



Please refer to Appendix A.6.7_NonConfidential_EMC_10k.F for last year's audited financial statements of Exxon Mobil Corporation. EMPSC does not file separate audited financial statements.	
	Appendix reference: Appendix A.6.7_NonConfidential_EMC_10k.F

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.

[Redacted – commercially sensitive cost information]	
	Appendix reference: Appendix_A.6.6_[Redacted – confidential appendix reference]

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.

Please refer to Appendix_A.6.7_NonConfidential_EMC_10k for Exxon Mobil Corporation's last year's audited financial statements; Please note that in 2026 a new holding company was created (ExxonMobil Holdings Corporation) as part of a re-domiciliation to Texas.

Appendix reference:
Appendix_A.6.7_NonConfidential_EMC_10k.F

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.

Exxon Mobil Corporation's accounting practices and chart of accounts are prepared in accordance with both IFRS and USA GAAP. Consolidated ExxonMobil books are published under US GAAP in the United States while foreign affiliates will produce statements that follow IFRS or Local GAAP as well, depending on the local requirements.

[Redacted – commercially sensitive cost information]

There are 2 types of pricing formation elements:
1) First is cost of goods sold (COGS)
For COGS, the accounting entries are determined based on material code, plant and inventory movement types. Examples for inventory movement types include goods receipt and goods issue.

2) Second is the operating expenses (OPEX):
For OPEX, there are 2 types of costs. First is primary (direct) expense, which can be traced directly to a product profit center. Second is secondary (indirect) expense, which is allocated based on Cost Center and are reasonable allocated to product lines in [Redacted – commercially sensitive information – contains supplier identity] through different criterias. [Redacted – commercially sensitive financial information]

The financial and cost accounting systems are maintained under:

[Redacted – commercially sensitive accounting system information]

Data is processed through [Redacted – commercially sensitive accounting system information]

ExxonMobil's corporate structure comprises a number of distinct legal entities, each separately incorporated and operating in their respective jurisdictions. For management and operational purposes, the group's activities are organized into units, each divided based on its main activity and location, to ensure effective oversight of the broad activity range and geographical span. The transactions between affiliates are recorded at [Redacted – commercially sensitive accounting system information], in accordance with local law requirements (particularly related to tax return and governmental reporting) in each country where detailed and isolated information is needed. This information often involves keeping import/export control and in-country basis for tax/tax return calculation in the various countries where ExxonMobil operates.

[Redacted – commercially sensitive intercompany arrangement and financial information]

Appendix reference: Appendix_A.6.8_[Redacted – confidential appendix reference]

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.

There have been no material changes in ExxonMobil's accounting systems.

Appendix reference: Not applicable

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.

Unique numerical material codes are created for distinct combinations of product and package style. [Redacted – commercially sensitive business information]

Appendix reference: Not applicable.

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

The same material codes are used throughout different stages. In some cases, there may be repackaging activities such that a resin is produced under one material code and then sold under a different material code for a different packaging style of the same resin. For example, [Redacted – commercially sensitive production information]
Appendix reference: Not applicable

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.

ExxonMobil sells and markets various Metallocene ("Me") C6 LLDPE grades based on performance (attributes). As such, technical sales documents are developed to highlight and compare product performance in a wide variety of applications. [Redacted – commercially sensitive pricing information] An example of an extract of such a technical sales document is provided below. It demonstrates that the same film performance can be obtained by using ExxonMobil's C6LLDPE metallocene products with a 40 micron film than a 60 micron film based on C4LL ZN combined with LDPE products. This downgauging results in significant savings for the value chain as well as less packaging waste. [Redacted – commercially sensitive business information, including a graph] To provide context, packaging films are typically multi-layer structures in which different polymer grades are selected for specific layers based on the performance requirements of the end application. For example, a freezer film needing cold-temperature bag drop resistance may use different grades than a stretch film requiring elasticity and stretchability. For the purpose of the investigation, the general performance ranking the relevant grades – from lowest to highest mechanical performance – is as follows: C4LLDPE Ziegler-Natta ("ZN") → C6LLDPE ZN → C8LLDPE ZN → C6/C8 metallocene LLDPE, as is illustrated by the below graph. Important to note is that even within the

Metallocene space, there are clear differences in performance between various grades. [Redacted – commercially sensitive business information, including a graph] In addition to performance and the value it delivers in the end-application (such as thinner film, higher packaging line speed, less food waste/better hermeticity, etc.), supply/demand aspect should also be considered:[Redacted – commercially sensitive business and pricing information]
Appendix reference: Appendix_A.7.1.3.a_[Redacted – confidential appendix reference] Appendix_A.7.1.3.b_NonConfidential_EMPSC_IneosLL8109AA.F Appendix_A.7.1.3.c_NonConfidential_EMPSC_Flowm1020.F Appendix_A.7.1.3.d_NonConfidential_EMPSC_sC6LL0917.F Appendix_A.7.1.3.e_NonConfidential_EMPSC_Tough+m1019.F Appendix_A.7.1.3.f_NonConfidential_EMPSC_C4LL1018.F Appendix_A.7.1.3.g_NonConfidential_EMPSC_C6LL1017.F Appendix_A.7.1.3.h_NonConfidential_EMPSC_Dowlex2045G.F Appendix_A.7.1.3.i_NonConfidential_EMPSC_DowlexTM2045G.TDS.F Appendix_A.7.1.j_NonConfidential_EMPSC_Exceedm1018.F

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.

[Redacted – commercially sensitive sales and product information]
Appendix reference: Not applicable

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.

1/ Please find below general information on sales of LLDPE which apply to all Respondents.

The products produced and sold in the United States and exported to the United Kingdom are Linear Low Density Polyethylene (LLDPE) resins manufactured and marketed under various ExxonMobil product families, [Redacted – commercially sensitive product and production information]

The products [Redacted – commercially sensitive business information] generally exhibit:

- Uniform pellet size and shape.
- Density characteristics typical of LLDPE
- Consistent mechanical properties within product specifications.
- Excellent flexibility and durability.
- Good optical properties, depending on grade selection.
- Suitability for a wide range of film conversion processes.

[Redacted – commercially sensitive product information]

A sample of product data sheets are provided in EMPSC's corresponding Appendices A.7.5.a up to A.7.5.j included, and additional product data sheets can be found on our website:
https://www.exxonmobilchemical.com/en/productselector/#/datatable/landinghttps://www.exxonmobilchemical.com/en/productselector/#/datatable/landing

Appendix reference:
Appendix_A.7.5.a_NonConfidential_EMPSC_TDS_C4LL1018.AV.F
Appendix_A.7.5.b_NonConfidential_EMPSC_TDS_C4LL1018.AY.F
Appendix_A.7.5.c_NonConfidential_EMPSC_TDS_ExceedFlowm0535.RA.F
Appendix_A.7.5.d_NonConfidential_EMPSC_TDS_Exceed Flow+m0126.RA.F
Appendix_A.7.5.e_NonConfidential_EMPSC_TDS_Exceedm1018 Series.F
Appendix_A.7.5.f_NonConfidential_EMPSC_TDS_Exceedm3518.CB.F
Appendix_A.7.5.g_NonConfidential_EMPSC_TDS_Exceedm4518.PA.F
Appendix_A.7.5.h_NonConfidential_EMPSC_TDS_ExceedStiffm1327.RA.F

Appendix_A.7.5.i_NonConfidential_EMPSC_TDS_ExceedStiff+m0238.RA.F Appendix_A.7.5.j_NonConfidential_EMPSC_TDS_ExxtraSealm1012S.F

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**.

[Redacted – commercially sensitive sales information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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**.

[Redacted – commercially sensitive business information]

B3 Sales

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

[Redacted – commercially sensitive sales information]
Appendix reference: Appendix_B.3.1_[Redacted – confidential appendix reference]

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

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business and pricing information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business and pricing information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive sales and commercial terms information]
Appendix reference: Not applicable

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.

Production planning is coordinated through [Redacted – commercially sensitive organisation information] process, [Redacted – commercially sensitive production information].
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive sales information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive commercial terms and pricing information]
Appendix reference: Not applicable

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**.

[Redacted – commercially sensitive business information]

Appendix reference: Not applicable

- 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**.

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive financial information]
Appendix reference: Not applicable

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.

Please refer to the Appendices, which contain two sets of documents relating to sales to the UK [Redacted – commercially sensitive business information], each concerning a different customer.
Each set includes an order confirmation, setting out the applicable contractual terms, including [Redacted – commercially sensitive business information]

Appendix reference:
Appendix_B.4.1.4.a_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.b_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.c_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.d_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.e_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.f_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.g_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.h_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.i_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.j_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.k_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.l_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.m_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.n_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.o_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.p_[Redacted – confidential appendix reference]
Appendix_B.4.1.4.q_[Redacted – confidential appendix reference]

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.

Please refer to the relevant section in Annex II.	
	Appendix reference: Not applicable

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.

Please refer to the Appendices, which contain two sets of documents relating to domestic sales [Redacted – commercially sensitive business information], each concerning a different customer. Each set includes an order confirmation, setting out the applicable contractual terms, including [Redacted – commercially sensitive business information]	
	Appendix reference: Appendix_B.4.2.2.a_[Redacted – confidential appendix reference] Appendix_B.4.2.2.b_[Redacted – confidential appendix reference] Appendix_B.4.2.2.c_[Redacted – confidential appendix reference] Appendix_B.4.2.2.d_[Redacted – confidential appendix reference] Appendix_B.4.2.2.e_[Redacted – confidential appendix reference] Appendix_B.4.2.2.f_[Redacted – confidential appendix reference]

Appendix_B.4.2.2.g_[Redacted – confidential appendix reference] Appendix_B.4.2.2.h_[Redacted – confidential appendix reference] Appendix_B.4.2.2.i_[Redacted – confidential appendix reference] Appendix_B.4.2.2.j_[Redacted – confidential appendix reference]

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.

All transactions in sales table B4 for EMPSC for sales to the domestic market are reported in USD. [Redacted – commercially sensitive business information]Most columns are reported in USD due to ease of reconciliation with the booked values in SAP. If the final invoice towards the customer was in Euro or GBP, then the original stated invoice amounts (Gross Revenue/invoice value and Net Revenue/invoice value) were also reported. [Redacted – commercially sensitive business and financial information – the confidential version describes the processing of exchange rates and provides an overview table of the rates applied].
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive pricing information – the confidential version provides a description of the pricing and pricing drivers, and includes an overview table and adjustment information]

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

[Redacted – commercially sensitive sales and pricing information]	
	Appendix reference: Not applicable

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

[Redacted – commercially sensitive business and sales information]	
	Appendix reference: Not applicable

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.

[Redacted – commercially sensitive sales and financial information – the confidential version contains a description, an overview table and the GL account(s) for each expense]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business information – the confidential version contains a detailed explanation on interest rates determination and application, including an illustrative example and corresponding overview tables]
Appendix reference: Appendix_C.1.4_[Redacted – confidential appendix reference]

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?

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business information. The confidential version contains a description of supply chain costs calculation, including an overview table, and a general ledger account record identification]
Appendix reference: Appendix_C.2.3_[Redacted – confidential appendix reference]

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.

[Redacted – commercially sensitive business information]

[Redacted – commercially sensitive business and pricing information - the confidential version provides pricing information by product category and includes an illustrative example with a supporting table and graph]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive sales and pricing information]
Appendix reference: Not applicable

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

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business and sales information]
Appendix reference: Not applicable

- 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.

[Redacted – commercially sensitive organisational information]
Appendix reference: Not applicable

- 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.

[Redacted – commercially sensitive organisational information]
Appendix reference: Not applicable

- 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.

[Redacted – commercially sensitive organisational information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive organisational information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive sales information]
Appendix reference: Not applicable

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

[Redacted – commercially sensitive sales information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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).

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive financial information]
Appendix reference: Not applicable

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.

The following EMPSC facility produces LLDPE: [Redacted – commercially sensitive production information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business information – the confidential version contains a detailed description of the production process]
Appendix reference: Appendix_D.3.2_[Redacted – confidential appendix reference]

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).

The main inputs to the production process are monomer (ethylene) and comonomer (butene or hexene). [Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive production information]
Appendix reference: Not applicable

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

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

D5 Capacity

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

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.)

[Redacted – commercially sensitive production information. The confidential version includes an illustrative example of capacity calculation and a production overview table]
Appendix reference: Not applicable

D6 Stocks

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

[Redacted – commercially sensitive supply chain information]
Appendix reference: Not applicable

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

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

Waste streams include [Redacted – commercially sensitive production information] Offgrade product will have quality data – for example, a reactor was intending to produce material with a density of 0.916 – 0.920 but the density produced was 0.921, so the product is out of prime specifications – whereas scrap may not have strong quality data and it may not be clear what exactly the material is, such as floor sweepings, scraps recovered from hopper car washes, etc. Cost and revenue for these materials may depend on the specific scenario, [Redacted – commercially sensitive production information]. As an order of magnitude, polymer scrap represents approximately less than [Redacted – commercially sensitive information]% of sales from the assets and offgrade is approximately [Redacted – commercially sensitive information]% of sales.
Appendix reference: Not applicable

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.

MBPP produces [Redacted – commercially sensitive supply chain information].
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive cost and financial information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive supply chain information]
Appendix reference: Not applicable

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

[Redacted – commercially sensitive production and financial information]
Appendix reference: Not applicable

D9 Profitability

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

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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**.

All expenses, including operating expenditure and material procurement costs are recorded against the appropriate cost centers supporting the manufacturing site, including Operations, Maintenance, Safety, Environmental, and other functional areas. Costs are charged to the applicable General Ledger accounts in accordance with the nature of the expense and the company's accounting structure. [Redacted – commercially sensitive financial information. The confidential version provides for a detailed profitability calculation description]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

There are differences in costs between the goods concerned & like goods. [Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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)

Costs were aggregated at the [Redacted – commercially sensitive production information] and allocated based on [Redacted – commercially sensitive production information] production volumes to derive a unit cost ($/T) by cost category (e.g., Manufacturing Overhead, Primary Raw Materials). Production volumes were then consolidated by material number and grouped into the relevant in-scope product categories. [Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

No extraordinary costs during the period of investigation.
Appendix reference: Not applicable

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.

Internally generated funds are expected to cover the majority of financial requirements for production. The corporation does have long-term and short-term debt. [Redacted – commercially sensitive financial information]
Appendix reference: Not applicable

D11 AS&G in the US

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.

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

AS&G costs comprise of expenses incurred by the Polyethylene business organization, including Marketing, Sales, Management, and Product Management functions, as well as allocated corporate support service costs. These allocations cover General and Administrative functions such as Legal, Human Resources, Public and Government Affairs, Procurement, and Treasury/Audit. In accordance with guidance received, Depreciation & Amortization has also been included within this cost category. The portion allocated to the U.S. business was determined based on the ratio of LLDPE domestic sales to total Polyethylene sales generated by the respective entity or asset, thereby aligning cost allocation with the underlying sales contribution.
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive cost information]
Appendix reference: Not applicable

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.

This response covers major inputs – hexene and butene, [Redacted – commercially sensitive supply chain information] Please refer to the appendix for the relevant invoices and the corresponding general terms and conditions applicable to two purchases made by EMPSC.
Appendix reference: Appendix_D.12.1.a_[Redacted – confidential appendix reference]

Appendix_D.12.1.b_[Redacted confidential appendix reference] –

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'.

[Redacted – commercially sensitive supply chain information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive purchase information]
Appendix reference: Not applicable

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.

[Redacted – commercially sensitive business information]
Appendix reference: Not applicable

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.

It cannot be reasonably denied that the UK industry of the like goods experienced difficulties. However, those difficulties were not caused by the investigated Imported Goods (of US origin). Furthermore, the Applicant's methodology on pricing for proving material injury is defective.

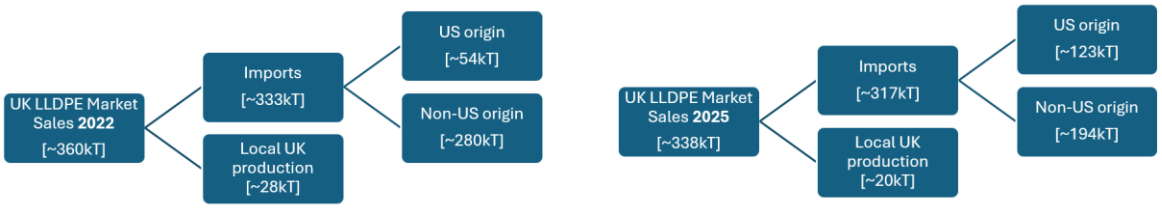
The Applicant omits or ignores crucial factors independent or remote from the Imported Goods such as: market demand, market composition before the Injury Period, global market supply-demand balance and resulting price declines, and structural UK production site cost disadvantages. The Application demonstrates, at most, a correlation between the US imports concerned and the alleged injury. The Applicant, however, fails to fulfil their burden to establish causation.

The Applicant's analysis and Material Injury claim is motivated by sales volume and price decreases from the Injury Period. **Careful analysis of both price and volume as presented by Applicant however demonstrate that there is no proven causal relationship between increased Imported Goods (of US origin) and Material Injury claimed by the Applicant.** Moreover, the Application omits or fails to adequately assess several crucial effective causes of the difficulties experienced by the UK industry, as set out below:

Volume decrease – no causal link

While the Applicant's presentation of a volume decrease of 35%-40% on their Like Goods may seem impressive at first sight – further analysis shows that this volume decrease is taken out of context from both the UK region and INEOS production asset perspective and is driven by other causes than the increase of Imported Goods.

- UK PE demand:
  - The following overview provides a reconstruction of the UK LLDPE market in 2022 and 2025 based on the data submitted by the applicant:



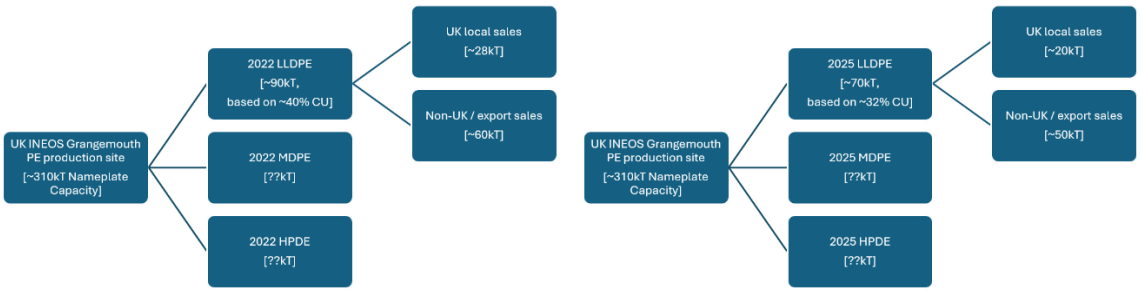
Source: applicant submission data, AMI & CMA (see footnote[1])

  - The Applicant's Application disregards the contraction in UK market demand itself, which is estimated to have fallen by approximately 6% from the exceptional peak reached during the COVID-19 period in year 2022, when demand for packed goods and packaging was at its highest point in a decade.
  - The applicant ignores the fact that the UK market was already heavily dependent on imports (>90%) before the injury period and that >90% of the volume gained by US importers was won from non-US origin importers (~86kT). This implies that the principal competitive effect of increased US imports was a redistribution of import market share among foreign suppliers and not from the local UK producer (~8kT). Therefore, the market-share gains achieved by imports of US origin does not, in itself, demonstrate injury to the UK industry, let alone an injury of a material nature.

Summarized – The Like Goods (UK LLDPE) market was/is a >90% import market, in which US origin import product has largely (>90%) replaced non-US import product during a period of market demand contraction. As such, the simultaneous displacement of, for majority part, non-US origin imports and, for a minor part, the UK domestic industry means that wider market forces i.e., global oversupply (more on that in the next section) are at work, not targeted dumping uniquely injuring the UK domestic industry.

[1] *Reconstruction of UK LLDPE market:*
LLDPE market in UK in 2022: ~360kT – Source: AMI database
LLDPE market in UK in 2025: ~338kT – Source: CMA page 14 – sum of decreases from 2022 – 2025 = 6%
Respective shares of import / Local UK production 2022 to 2025: page 47 Applicant Application Form
Respective shares of Local UK production: page 41 Applicant Application Form

- INEOS production asset:
  - The following overview provides a reconstruction of the INEOS UK LLDPE production plant in 2022 and 2025, based on data submitted by the Applicant:



Source: applicant submission data (see footnote[2])

  - While the UK site is also able to produce MDPE and HDPE products (on top of LLDPE) – no visibility on sales volumes was provided by the Applicant. In addition, limited information was provided on the non-UK/export sales. These numbers are relevant to the site as a whole, as the UK LLDPE sales to the UK are reasonably assumed to be only a small portion of the whole production site's annual production.
  - The Applicant's own data indicates that domestic UK sales declined by approximately 8kT during the Injury Period, while the Grangemouth LLDPE facility has a nameplate capacity of approximately 310 kT. Thus, the entirety of the alleged domestic sales loss represents less than 3% of annual site capacity and <6%-10% of annual estimated production (based on 30-50% CU). The Applicant has not explained how the loss of such a limited volume could reasonably account for the extensive deterioration alleged in production, capacity utilization, investment, profitability and employment. The evidence instead suggests that the economic performance of the facility is primarily determined by broader regional and global market conditions coupled with competitiveness of the site, which must be carefully distinguished from the effects of the investigated imports.

[2] Reconstruction of UK Grangemouth production site volumes:
Available Production capacity range: Applicant Application Form page 48, Table 5: [280,000 – 380,000]
Available Production capacity estimate: Process Engineering article "Ineos Polyolefins expanding Grangemouth Capacities" dated 19 March 2008. See Appendix_E.1.a_Confidential_EMPSC_ProcessEngineering.F; Contractors Unlimited article "AMEC wins BP Grangemouth work". See Appendix_E.1.b_Confidential_EMPSC_Contractorsunlimited.F
Capacity Utilization %: Applicant Application Form page 50, graph 3 for absolute CU % and page 48 Table 5 for relative CU%

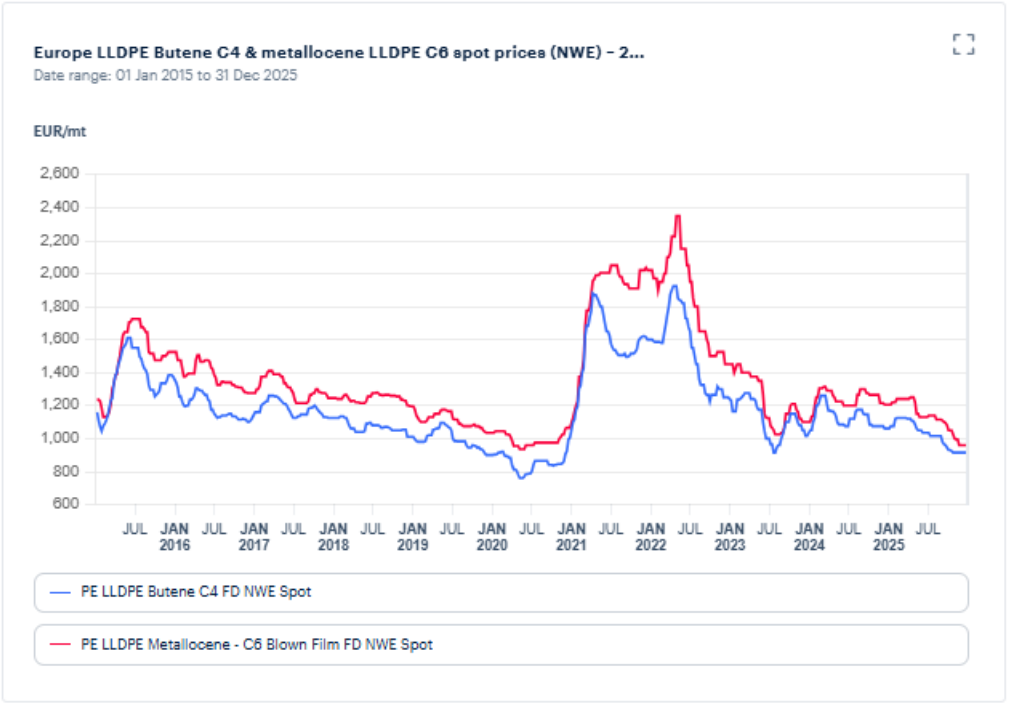
Summarized - the loss of approximately 8kT of Like Goods (UK domestic) sales over the injury period cannot plausibly explain why a 310 kT asset is reportedly operating at 30-50% utilization (with all negative effects claimed by the applicant as a result). The magnitude of the alleged injury is disproportionate to the volume allegedly displaced.

Price decrease – no causal link and deficiency in the Applicants methodology

The Applicant also fails to provide causal link between the price decrease of the Like Goods over the 2022-2025 time period and the increase in Imported Goods (US origin) over the same period.

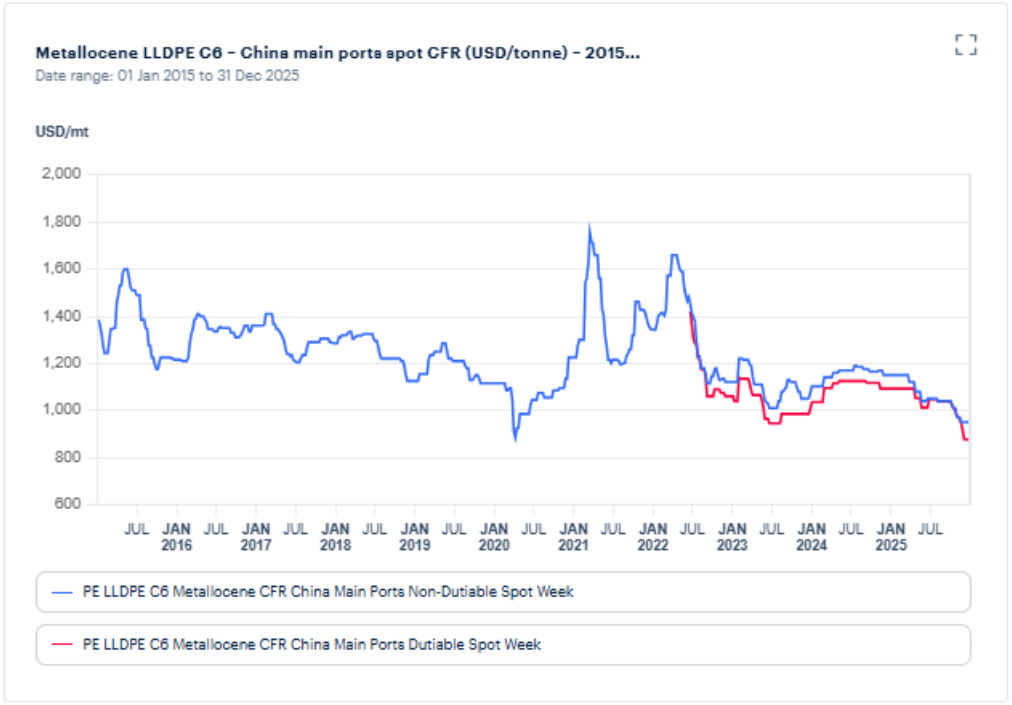
The following charts below are ICIS data based (ICIS is a leading price benchmark consultant, they deliver independent commodity pricing and analytics, news, market intelligence and insight across global chemical and energy markets (www.icis.com)) LLDPE **market** prices for Europe, Asia and US (because ICIS does not publish a 'global' price for LLDPE – individual charts are provided). The markers below represent C4LL = Butene based Ziegler-Natta Catalyzed LLDPE, C6LL = Hexene based Ziegler-Natta Catalyzed LLDPE, C6mLL = Hexene Based Metallocene Catalyzed LLDPE. Not all markers are published in all the regions, but the combined dataset below provides a very representative picture of European and Global LLDPE market prices.

Graph: ICIS based Europe LLDPE Prices (C4LL & C6mLL)



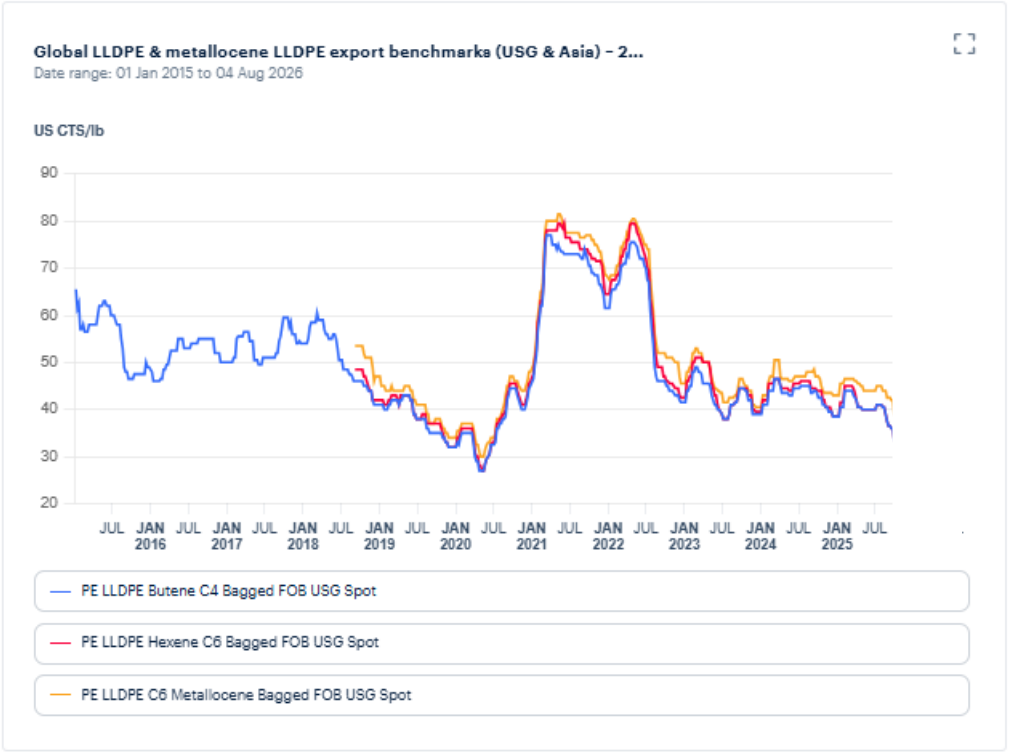
Source: ICIS

Graph: Asia (with China as proxy) LLDPE (mC6LL)



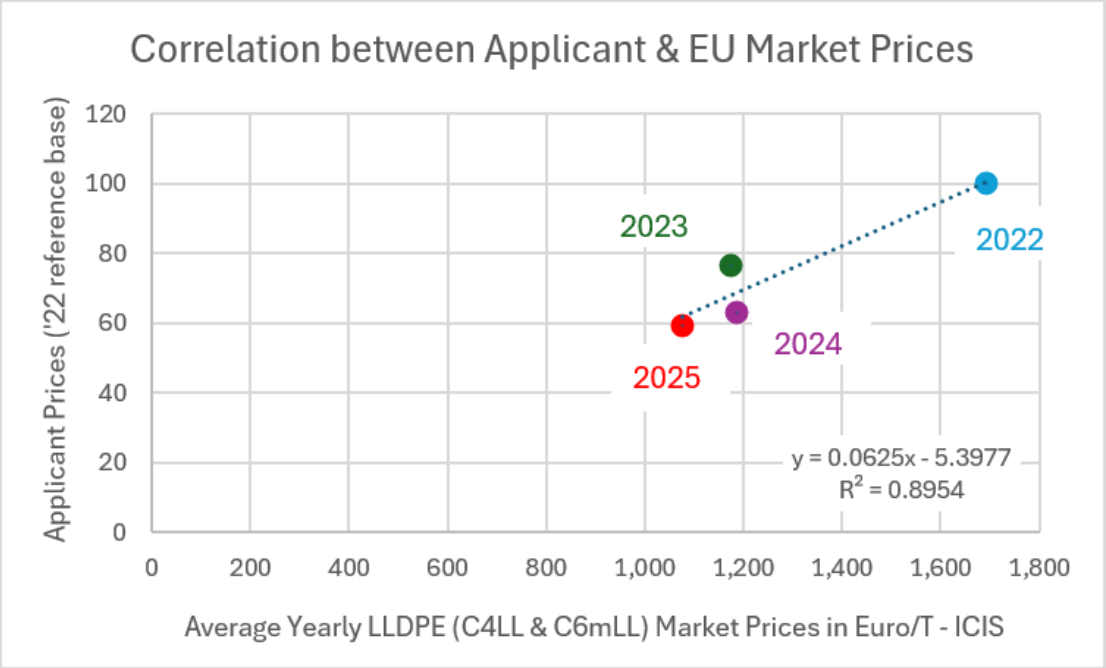
Source: ICIS

Graph: US LLDPE Prices (C4LL, C6LL & C6mLL)



Source: ICIS

- According to the Applicant's Application, the deterioration in the Like Goods selling prices has 'clearly been caused first and foremost' by imports of the Imported Goods (US-origin). However, the above charts show this is a global pricing phenomenon: European and Global LLDPE market benchmark data from ICIS show the same decline across all the markets during the same period. [Redacted – commercially sensitive pricing information]. This in fact can be explained by global bottom-of-cycle conditions within the global PE industry, driven by 1) overcapacity due to continued global investment and 2) global demand contraction post-covid. The direction, timing and magnitude of the price movement observed by the Applicant are therefore consistent with a broader market correction rather than a UK-specific effect arising from the investigated imports. In other words, there is no causal link between the increase in US imports into the UK and the observed price decrease in the 2022 to 2025 time period. In the following graph, the Applicant prices are correlated/compared with the global market prices. What results is a very strong correlation between the 2.



Source: Applicant submitted data & ICIS market reference data (see footnote[3])

Second, the reference year (2022) as chosen by the applicant is the year with the highest price in over a decade. Using this price level to be able to justify investments and continue reliable operations is both a deficiency in the Applicants methodology and not a sustainable business model. In addition, plant operations at CU% of 30-50%, while the average industry is running at around [Redacted – commercially sensitive business information] CU (as per

[3] Price Correlation Graph:
Applicant Prices: Applicant Application Form – page 44, Table 1
Market Prices: [ICIS PE LLDPE Butene C4 FD NWE Spot] & [PE LLDPE Metallocene - C6 Blown Film FD NWE Spot] Markers, yearly average

below chart), suggest many other (internal and external) competitiveness root causes. Several of these issues are illustrated in the applicant's submission and are elaborated upon by way of illustration in Annex 1, but cannot be reasonably attributed to increased US LLDPE imports into the UK.

[Redacted – commercially sensitive business information, including plant operations at CU% visualised in a graph]

Summarized, **the decline in UK sales prices for the Like Goods mirrored price trends across the European and global LLDPE markets.** This market-wide correlation undermines the alleged 'clear and first and foremost' causal link. It indicates that **broader market conditions, rather than the Imported Goods (of US origin), were the principal cause of the price decline and related injury.** Moreover, the Applicant applies a deficient methodology by using the exceptional price peak of 2022 as its baseline, which overstates the apparent deterioration, while its low capacity utilisation points to broader competitiveness and operational challenges that cannot reasonably be attributed to US imports.

Annex – Other causal factors for the Grangemouth site decline

1. High UK Energy Costs and Carbon Taxes

INEOS' own public statements directly contradict its complaint's assertion that energy costs and carbon taxes are negligible factors. In April 2025, INEOS publicly declared: "Carbon tax and high energy costs are killing off manufacturing in Britain". [1] In January 2025, INEOS stated: "Chemicals coming to an end in the UK". [2] Sir Jim Ratcliffe himself, in the December 2025 announcement of the £150 million government investment, stated: "High energy costs and punitive carbon charges are driving industry out of the UK at an alarming rate. If politicians want jobs, investment and energy security, then they must create a competitive environment". [3]

In parliamentary proceedings, INEOS told the UK Parliament "in no uncertain terms that carbon taxes and high energy costs are killing off manufacturing in the UK". [4] The UK Government described the Grangemouth site as facing the "risk of closure" specifically "due to surging energy costs and carbon taxes". [5]

These public admissions are devastating to INEOS' attempt in the complaint to minimise energy costs as an injury factor. The complaint's assertion that energy costs "decreased from 200p per therm to 89p per therm" during the injury period must be evaluated against the reality that UK industrial energy costs remain substantially above US levels. The relevant metric is not the direction of change in UK energy costs but the persistent competitive gap between UK and US energy costs — a gap that constitutes a structural injury factor entirely unrelated to dumping.

2. The Grangemouth Site Crisis

The Grangemouth industrial complex has been in a state of multi-year crisis that has nothing to do with LLDPE imports. The Petroineos oil refinery at Grangemouth — co-located with and integrated into the INEOS chemicals operations — was closed in April 2025 with the loss of 400 direct jobs.[6] Petroineos cited losses of approximately $500,000 per day and stated the refinery "had become uncompetitive against larger

and more [efficient refineries]". [7] In December 2023, Versalis announced permanent closure of its own Grangemouth site, eliminating approximately 135 jobs. [8]

The December 2025 UK Government bailout — which INEOS cites as evidence of injury from dumping — was explicitly designed to save "Britain's last ethylene plant" and was driven by the wider structural crisis affecting the entire Grangemouth complex. [9,10] The Government framed the intervention in terms of energy security, the Forties Pipeline System, and preserving the UK's chemical manufacturing base in the face of high energy costs — not in terms of addressing unfairly traded imports. [11, 12, 13] INEOS had spent "over £100 million over the last year maintaining operations at the site" before the bailout, indicating pre-existing financial distress from operational causes. [14]

The loss of the integrated refinery, the disruption to site-wide utilities and shared infrastructure, and the general atmosphere of decline at Grangemouth inevitably affect the LLDPE operation. The complaint acknowledges that maintenance of the ethylene cracker was "delayed in 2023 and 2024 (taking longer to complete) which resulted in the LLDPE plant not receiving sufficient feedstock to start production". [15] This feedstock interruption — caused by INEOS' own financial inability to maintain its cracker — directly reduced the LLDPE plant's utilisation. It is a self-inflicted wound, not a consequence of US imports.

Annex notes:

1. See Appendix_E.1.c_NonConfidential_EMPSC_Grangemouth News April 2025.F
2. See Appendix_E.1.d_NonConfidential_EMPSC_Grangemouth News Jan 2025.F
3. See Appendix_E.1.e_NonConfidential_EMPSC_150mio investment announcement.Dec2025.F
4. See Appendix_E.1.f_NonConfidential_EMPSC_UK Parliament Hansard.F
5. See Appendix_E.1.g_NonConfidential_EMPSC_Industrial Info 18 Aug 2025.F
6. See Appendix_E.1.h_NonConfidential_EMPSC_The Guardian June 2025.F
7. See Appendix_E.1.i_NonConfidential_EMPSC_Reuters April 2025.F
8. See Appendix_E.1.j_NonConfidential_EMPSC_Gov scot extract Nov 2024.F
9. See Appendix_E.1.k_NonConfidential_EMPSC_Gov.UK press release Dec 2025.F
10. See Appendix_E.1.k_NonConfidential_EMPSC_Gov.UK press release Dec 2025.F
11. See Appendix_E.1.k_NonConfidential_EMPSC_Gov.UK press release Dec 2025.F
12. See Appendix_E.1.k_NonConfidential_EMPSC_Gov.UK press release Dec 2025.F
13. See Appendix_E.1.k_NonConfidential_EMPSC_Gov.UK press release Dec 2025.F
14. Applicant Application Form Page 55

Appendix reference:

Appendix_E.1.a_NonConfidential_EMPSC_ProcessEngineering.F
Appendix_E.1.b_NonConfidential_EMPSC_Contractorsunlimited.F

Appendix_E.1.c_NonConfidential_EMPSC_Grangemouth News April 2025.F
Appendix_E.1.d_NonConfidential_EMPSC_Grangemouth News Jan 2025.F
Appendix_E.1.e_NonConfidential_EMPSC_150mio investment announcement.Dec2025.F
Appendix_E.1.f_NonConfidential_EMPSC_UK Parliament Hansard.F
Appendix_E.1.g_NonConfidential_EMPSC_Industrial Info 18 Aug 2025.F
Appendix_E.1.h_NonConfidential_EMPSC_The Guardian June 2025.F
Appendix_E.1.i_NonConfidential_EMPSC_Reuters April 2025.F
Appendix_E.1.j_NonConfidential_EMPSC_Gov scot extract Nov 2024.F
Appendix_E.1.k_NonConfidential_EMPSC_Gov.UK press release Dec 2025.F

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.

A) [Redacted – commercially sensitive business information]

[Redacted – commercially sensitive product information]

Based on the Applicant's submitted technical datasheets and the Respondent's market knowledge, the Applicant's current UK production capabilities appear to be limited to **C6 LLDPE produced using Ziegler-Natta catalyst technology (C6LL Zn)**. Nevertheless, the Applicant claims that C4LL Zn, C6LL Zn, C6LL Me (metallocene) and C8LL Me (metallocene) are all "like goods," that they are interchangeable, and that UK purchasers and converters would source C6LL Zn as a replacement for US-origin C6LL Me, C8LL Me, or C4LL Zn.

These claims are not substantiated. [Redacted – commercially sensitive information]

Physical likeness and chemical composition

The Applicant argues that the products share physical likeness and chemical composition. Most polyolefins and other plastics are supplied in pellet form of a similar size and transparent colour, and most share the same carbon-based building blocks. However, this observation is equally true of numerous polymer grades with widely different properties, uses, and applications. For example, polypropylene resins used in automotive parts have the same physical likeness as polyethylene pellets used for wire and cable jacketing and polyethylene pellets used for food packaging films. In the Respondent's view, the physical-likeness argument is therefore irrelevant.

[Redacted – commercially sensitive business information. The confidential version provides a detailed PE types comparison description, including a graph and two illustrative examples]

The Applicant's own public statements confirm product differentiation

In publicly available materials, the Applicant itself treats C6 LLDPE as a differentiated product occupying a distinct, higher-performance segment from C4 LLDPE. In its product brochure, the Applicant describes its C6 LLDPE grades as offering "*Distinctive and Unique advantages*" with "*superior*" toughness, reduced neck-in, and better stretchability that C4 materials cannot match without additional thickness. The Applicant further states that its "*enhanced levels of toughness and tear resistance can allow for significant down-gauging compared to LLDPE-C4 materials*."

Source: pp. 4 and 9 of INEOS' brochure "Your partner in Hexene (C6) LLDPE Film," © INEOS Olefins & Polymers Europe, September 2019. See Appendix_Scope_Conf_EMPSC_Ineos brochureC6LLDPE.F

Conclusion on scope

These examples confirm that C4, C6 Zn, C6 Me, and C8 LLDPE grades [Redacted – commercially sensitive information] They exhibit materially different performance characteristics, serve different customer requirements, and produce significantly different outcomes in terms of film thickness, recycled-content capability, and end-product performance. [Redacted – commercially sensitive information]

B) Impact on exports of the goods concerned to the UK

If trade-remedy measures or import tariffs were to be applied broadly to **all** LLDPE products (rather than being narrowly limited to C6LL Zn), the Respondent would no longer be able to supply its UK customers with C6LL metallocene and C4LL Zn products at competitive prices. The Applicant does not appear capable of producing

these grades at its Grangemouth facility, meaning that UK purchasers and converters would lose access to distinct products for which there is no equivalent domestic supply.

More specifically:

- For **C6LL Me**, broad duties would [Redacted – commercially sensitive business information]. UK customers currently rely on these products for high-performance packaging applications — including downgauged food packaging and stretch-wrap films incorporating recycled content — where conventional C6LL Zn cannot deliver equivalent performance.
- For **C4LL Zn grades**, broad duties would similarly restrict supply to UK converters who use these grades in cost-sensitive commodity applications where they are not substitutable with C6LL Zn without adverse effects on film properties and conversion economics.

C) Impact on the market price of the goods in the UK

Increased landed cost and reduced product availability

The mechanical effect of anti-dumping duties is to increase the landed cost of imported US-origin LLDPE by the amount of the duty. However, the true market-price impact extends well beyond this nominal increase, because of the nature of the products affected.

As set out in Part A above, the Applicant's UK production at its Grangemouth facility is currently concentrated on C6LL Zn. While the Applicant has stated in its application that all three co-monomer variants can in principle be produced from the same process types and with interchangeable catalysts, this theoretical flexibility has not translated into actual commercial supply of C6LL Me, C8LL Me, or C4LL Zn from Grangemouth. Duties – particularly if applied broadly across all LLDPE grades – would therefore not result in an immediate shift of supply from imports to domestic production. Instead, they would reduce the availability of differentiated products that the domestic industry does not currently supply. UK purchasers would face both higher costs for those grades that remain available and a loss of access to grades that the domestic industry has not demonstrated the capacity or willingness to produce in commercial volumes.

Reduced film performance and higher total cost of ownership for converters

The market-price impact on the UK must be assessed not by reference to the resin price per tonne alone, but by the total cost to produce a unit of finished film. UK converters that currently use high-performance metallocene grades benefit from the ability to downgauge their films – that is, to achieve equivalent or superior film performance at a thinner gauge – thereby reducing material consumption per unit of

output. As demonstrated above, a 40-micron film produced using the Respondent's C6 LLDPE metallocene product achieves performance comparable to a 60-micron film based on C4LL Zn blended with LDPE, representing an approximate one-third reduction in material use.

If duties render metallocene grades unavailable or uneconomic, UK converters would be forced to revert to thicker films based on lower-performance grades. This would increase:

- the quantity of resin required per unit of finished film;
- per-unit material and production costs; and
- packaging waste volumes.

The effective cost to UK converters – and, ultimately, the price of finished film products in the UK – would therefore increase by significantly more than the nominal duty rate, as converters would require more resin per unit of output to achieve the same film performance.

Competitive impact on UK converters from imported finished films

The imposition of duties on LLDPE resin would increase input costs for UK film converters without providing any equivalent protection against imported *finished films*. Converters in countries that can purchase US LLDPE without anti-dumping duties – including converters in the EU, Turkey, and the Middle East – would continue to benefit from competitively priced, high-performance resin. Their finished film products would enter the UK market at prices that UK converters, burdened by higher resin input costs, could not match.

Broad duties on LLDPE would therefore risk a shift in trade patterns: rather than protecting UK domestic industry, duties would divert competitive pressure from the resin level to the finished-film level, ultimately undermining the viability of UK converting operations and the jobs they support.

No domestic substitute for the affected grades

Because the Applicant does not produce C6LL Me, C8LL Me, or C4LL Zn at its UK facility, the domestic industry cannot replace the supply that would be withdrawn or reduced by duties. UK purchasers would therefore face both higher costs and reduced product availability, with no realistic prospect of domestic substitution.

These effects would be most pronounced under broad measures covering **all** LLDPE grades, but would also arise – to a lesser degree – under narrow measures limited to C6LL Zn. The Respondent respectfully urges the TRA to take these impacts into careful consideration in its assessment of the economic interest of the United Kingdom.

D) Broad duties would undermine UK customers' ability to tailor performance through blending

The Applicant itself acknowledges that, for applications with more sophisticated performance requirements (e.g., cable jackets), customers select different combinations of C4, C6, and C8 LLDPE and blend them according to the strength required, and that additives, blends, and multilayer structures allow buyers to tailor performance regardless of the comonomer type. This concession confirms that UK converters actively rely on access to a range of comonomer types – not a single grade – to engineer the properties their end-use applications require. The very flexibility that the Applicant points to as evidence of interchangeability in fact depends on the continued availability of each distinct grade at competitive prices.

By extending the scope of the investigation to cover all LLDPE grades, broad duties would severely curtail the opportunity for UK customers to produce such tailored blends. If C4LL Zn, C6LL Me, and C8LL Me grades from the United States are rendered unavailable or uneconomic, UK converters would lose access to the specific comonomer inputs needed to achieve the performance characteristics that the Applicant's own submission describes.

The Applicant's own example underscores this point: its German sister company previously produced C4 for wire cabling but shifted production to C6. This shift confirms that the choice between comonomer types is driven by specific technical and commercial considerations, [Redacted – commercially sensitive information] — if the two were truly equivalent, there would have been no reason for the transition.

The Respondent respectfully submits that this impact on the ability of UK converters to optimise their formulations through blending must weigh heavily [Redacted – commercially sensitive information].

Appendix reference:
Appendix_E.2.a_[Redacted – confidential appendix reference]
Appendix_A.7.1.3.a_[Redacted – confidential appendix reference]
Appendix_Scope_NonConfidential_EMPSC_Ineos brochureC6LLDPE.F

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	✓
Section B – Sales	✓
Section C – Fair comparison	✓
Section D – Costing information	✓
Section E – Other questions	✓
Section F – Declaration	This section was not included in the questionnaire published by the TRA.

+Add additional rows as required.

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

Appendix reference	**Document title *** **the document title is provided in the appendix reference*
Appendix_Scope_NonConfidential_EMPSC_Ineos brochureC6LLDPE.F	
Appendix_A.6.7_NonConfidential_EMC_10k.F	
Appendix_A.7.1.3.b_NonConfidential_EMPSC_IneosLL8109AA.F	
Appendix_A.7.1.3.c_NonConfidential_EMPSC_Flowm1020.F	
Appendix_A.7.1.3.d_NonConfidential_EMPSC_sC6LL0917.F	
Appendix_A.7.1.3.e_NonConfidential_EMPSC_Tough+m1019.F	
Appendix_A.7.1.3.f_NonConfidential_EMPSC_C4LL1018.F	

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