

Anti-Dumping Questionnaire (Exporter)

Case TD0035: Certain pneumatic tyres used for buses or lorries exported from the People's Republic of China (PRC)

Period of Investigation (POI):	1 January 2022 – 31 December 2022
Injury period:	1 January 2019 – 31 December 2022
Deadline for response:	8 September 2023
Contact details:	TD0035@traderemedies.gov.uk
Completed on behalf of:	Jiangsu Hankook Tire Co. Ltd. ("JHKT")

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 10 August 2023.

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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 a Transition Review of the UK trade remedies measure set out in [Taxation Notice 2020/18](#) which gave effect to the EU trade remedies measure specified in the [Notice of Determination 2020/18](#). The TRA's role is to consider whether the dumping of the goods and injury to the UK industry is likely to continue or recur if the anti-dumping measures were to be revoked.

Why should I take part?

We are asking overseas exporters to complete this questionnaire to help us understand the industry and market for this product and assess whether the dumping of the Goods Subject to Review would be likely to continue or recur if the measure were revoked, and whether there is a likelihood of injury to the UK industry as a result of that revocation.

If you are an exporter of the Goods Subject to Review 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 Subject to Review that you export.

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

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 10 August 2023. 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 TD0035@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 10 August 2023 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 formulae 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, TD0035, 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, and
- 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 Subject to the Review.

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 Subject to Review, 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 Goods Subject to Review 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 Goods Subject to Review 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 or remote meeting/s 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.

Please indicate any dates when you would be unable to host a verification visit.

The company will be unavailable on the following dates due to previously scheduled commitments:

- 15th September ~17th September 2023
- 28th September ~ 15th October 2023 (3rd Quarter Audit)
- 29th October ~ 31st October 2023

Appendix reference: N/A

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.

In this version of the questionnaire response, parts of the answers and certain exhibits and annexes have been redacted since they constitute confidential business information the disclosure of which may cause prejudice to the Hankook Group. Where possible, a summary of the redacted information has been provided.

The scope of this investigation

Goods subject to review

This review covers certain pneumatic tyres, new or retreaded, of rubber, of a kind used for buses and lorries, with a load index exceeding 121, exported from the People's Republic of China (PRC).

These Goods Subject to Review are currently classifiable within the following commodity codes:

- 4011 20 90 00
- 4012 12 00 10

These commodity codes are only given for information.

In this questionnaire, these goods will be referred to as '**the Goods Subject to Review**'. Any reference to 'Goods Subject to Review' 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 Subject to Review, 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.

We have created a draft PCN table and enclose this here for you now.

Category:	Section Width (in mm or inches)	Aspect Ratio (% of section width)	Construction	Rim / Wheel Diameter (inches)	Tyre Position	Winter Tyre	Tubeless or Tubetype Tyre
Expected input:	numerical measurement	numerical measurement	R - radial, B- Bias	numerical measurement	F - front, D - drive, T - trailer, Z - multi-position	Y - yes, N - no	TL - tubeless, TT - with tube

Considering four potential real-world examples:

- 1) Front all season tubeless radial tyre, 315mm wide, aspect ratio of 80%, 22.5 diameter.
- 2) Trailer all season tubeless radial tyre, 10 inches wide, aspect ratio of 100, 22.5 diameter.
- 3) Multi-position all season tubed radial tyre, 13 inches wide, aspect ratio of 100, 19.5 diameter.
- 4) Drive winter tubeless radial tyre, 275mm Wide, aspect ratio of 70, 22.5 diameter.

This information feeds into the final PCN in the following manner:

Example	Section Width (in mm or inches)	Aspect Ratio	Construction	Rim/Wheel Diameter	Tyre Position	Winter	Tubeless or Tubed	PCN
1	315	80	R	22.5	F	N	TL	315/80R22.5FNTL
2	10	100	R	22.5	T	N	TL	10/100R22.5TNTL
3	13	100	R	19.5	Z	N	TT	13/100R19.5ZNTT
4	275	70	R	22.5	D	Y	TL	275/70R22.5DYTL

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 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.

Not Applicable

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

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 Subject to Review and the like goods.

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:	Jiangsu Hankook Tire Co., Ltd.
Legal structure (e.g., limited company, sole trader, partnership etc)	Limited company
Year of establishment:	26/03/1996
Other operating names:	N/A
Company registration number:	[CONFIDENTIAL – commercially sensitive information]
Place of registration:	No.1, South Hantai Road, Huaian Economic Development Zone, Huaian, 223005 Jiangsu, China
Name (point of contact):	[CONFIDENTIAL – contains personal information]
Position:	Team Manager
Address:	No.1, South Hantai Road, Huaian Economic Development Zone, Huaian, 223005 Jiangsu, China
Telephone No:	[CONFIDENTIAL – contains personal information]
Email:	[CONFIDENTIAL – contains personal information]
Website:	www.hankooktire.com/cn

A2 About your company

1. Describe the role of your company in relation to exports of the Goods Subject to Review 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.

Jiangsu Hankook Tire Co., Ltd. (***JHKT***) is a producer and exporter of the Goods Subject to Review to the UK market.

Appendix reference: N/A

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

There were no changes in the legal form over the past 5 years.

Appendix reference: N/A

3. List and explain all authorisations your company has been required to obtain to produce, sell, or to export the Goods Subject to Review. 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.

JHKT was only required to obtain a business licence: please see Exhibit A4.3B, provided in response to question 3 of section A4 (below). There are no other restrictions.

Appendix reference: N/A

4. List all international production standards (BS / EN etc) your company currently conforms to, for the like goods / Goods Subject to Review.

JHKT conforms to the following:

- [CONFIDENTIAL – commercially sensitive information];
- [CONFIDENTIAL – commercially sensitive information]; and
- [CONFIDENTIAL – commercially sensitive information].

Appendix reference: [Exhibit A2.4A, Exhibit A2.4B, Exhibit A2.4C]
[CONFIDENTIAL – commercially sensitive information]

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.

JHKT is a member of **[CONFIDENTIAL – commercially sensitive information]**

Appendix reference: **[Exhibit A2.5]**
[CONFIDENTIAL – commercially sensitive information]

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 Subject to Review or other goods you produce.

JHKT provides the internal hierarchical and organisational structure of the company in **[Exhibit A3.2A and A3.2B]** Regarding the specific roles of the companies within the group (R&D, internal distribution, raw material supply etc.), please refer to worksheet A3 of Annex II.

Appendix reference: **[Exhibit A3.2A, Exhibit A3.2B]** **[CONFIDENTIAL – commercially sensitive information]**

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 POI, 1 January 2022 – 31 December 2022
 - b. the Board of Directors during the period of investigation (POI), 1 January 2022 – 31 December 2022
2. Explain your procedure for appointing the members of the Board of Directors.

JHKT has a Board of Directors, which consists of five members who are non-employee representatives. They are elected by the shareholders' meeting for a term of three years, which may be renewed by re-election. If a director is not re-elected in time for the expiry of their term of office, or if a director resigns during their term of office — resulting in the Board of Directors having a number of members which is lower than the quorum of the Board of Directors — that director shall continue to perform their duties in accordance with the relevant applicable laws, administrative regulations and articles of association of the company until a newly elected director assumes office. The Board of Directors elects a chairman and a vice-chairman.

The above procedure is described in the company's articles of association (see Exhibit A4.3A (below answer)).

Appendix reference: N/A

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.

- Articles of association
 - JHKT provides the articles of association in [Exhibit A4.3A] .
- Business licence
 - JHKT provides the business license in [Exhibit A4.3B] .
- Proof of registration of the company
 - JHKT provides the proof of registration of the company in [Exhibit A4.3C] .

Appendix reference: [Exhibit A4.3A, Exhibit A4.3B, Exhibit A4.3C]
[CONFIDENTIAL – commercially sensitive information]

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 People's Republic of China, 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
Hankook Tire Co., Ltd. (133 Yeoksam-dong, Gangnam-gu Seoul, Korea)*	Contracts for trademarks, concessions and technical services	N/A	[Exhibit A5.1] [CONFIDENTIAL – commercially sensitive information]
		Appendix reference: [Exhibit A5.1] [CONFIDENTIAL – commercially sensitive information]	

*To be noted that the contract was not updated to reflect the change in name to Hankook Tire & Technology Co. Ltd.

A6 Accounting practices

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

Records address	What records are held?
Factory Cashier Room No.1, South Hantai Road, Huaian Economic Development Zone, Huaian, 223005 Jiangsu, China	Accounting vouchers, invoices and other attachments
Factory technical building No.1, South Hantai Road, Huaian Economic Development Zone, Huaian, 223005 Jiangsu, China	Accounting vouchers, invoices and other attachments

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 financial year of JHKT is from 1 January to 31 December. There have been no changes either with respect to this period or in JHKT's accounting practices over the last four financial years.
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Appendix reference: N/A

3. For your company and any associated parties involved in the production, marketing or sales of the Goods Subject to Review, please attach a copy of your annual accounts covering the injury period including the financial statements and audit reports.

JHKT provides the audit reports covering the POI and the injury period.

Appendix reference: [Exhibit A6.3A, Exhibit A6.3B, Exhibit A6.3C, Exhibit A6.3D] [CONFIDENTIAL – commercially sensitive information]

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

Not applicable.

Appendix reference: N/A

5. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI and the most recent financial year. This includes:
- the trial balance which covers the beginning of the financial year to 1 January 2022;
 - the trial balance which covers the full financial year to 1 January 2022;
 - the trial balance which covers the beginning of the financial year to 31 December 2022.

JHKT provides a copy of the trial balance covering the POI, which is also the most recent financial year.

Appendix reference: [Exhibit A6.5] [CONFIDENTIAL – commercially sensitive information]

6. For your company and any associated parties involved in the production, marketing or sales of the Goods Subject to Review, please attach copies of relevant management reports (e.g. profit and loss statement) for the profit centre that

includes the Goods Subject to Review and like goods. Please provide these reports for the (i) POI and (ii) most recently completed financial year.

JHKT provides the 2022 audit report of Shanghai Hankook Tire Sales Co., Ltd. ("**SHT**") in [Exhibit A6.6.] 2022 is also the most recently completed financial year.

Appendix reference: [Exhibit A6.6]
[CONFIDENTIAL – commercially sensitive information]

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.

JHKT provides the 2022 consolidated audit report of Hankook Tire & Technology Co., Ltd. ("**HKT**") and subsidiaries (collectively, "**Hankook Group**") in [Exhibit A6.7] .

Appendix reference: [Exhibit A6.7]
[CONFIDENTIAL – commercially sensitive information]

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.
 - your company's cost centres; and

The accounting recognition, measurement and report of the company are made on **[CONFIDENTIAL – commercially sensitive information]**. JHKT's accounting principles and practices are fully set out in the Auditor's reports provided in [Exhibits A6.3A, A6.3B, A6.3C (see. "Notes to the financial statements", section 3) and A6.3D (see. "Notes to financial statements", section 2)] in particular.

- JHKT's chart of accounts
 - JHKT provides the chart of accounts in [Exhibit A6.8A.]
- JHKT's cost centres
 - JHKT provides the cost centres in [Exhibit A6.8B.]

Appendix reference: [Exhibit A6.8A, Exhibit A6.8B] **[CONFIDENTIAL – commercially sensitive information]**

9. Have you changed your financial policies 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 Subject to Review or like goods.

There were no changes in the financial policies during the injury period.

Appendix reference: N/A

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 Subject to Review 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.

JHKT provides a description of the company's CCN system in [Exhibit A7.1.] In addition, please see the subsection A7.1 of Section A of Annex II for detailed information as to how JHKT's CCN system corresponds to the PCNs.

Appendix reference: [Exhibit A7.1]
[CONFIDENTIAL – commercially sensitive information]

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

Not applicable. JHKT uses the same product codes across production, sales and invoicing.

Appendix reference: N/A

3. If there are differences in characteristics between your range of Goods Subject to Review 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.

The costs of production for each product regardless of the goods Subject to Review or like goods, are calculated **[CONFIDENTIAL – commercially sensitive information]**

Appendix reference: N/A

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.

Please refer to the Annex II Section A7.1. [**CONFIDENTIAL** – commercially sensitive information]

Appendix reference: N/A

5. For each type of the like goods sold on your domestic market and the Goods Subject to Review 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.

JHKT provides the sales brochure in Exhibit A7.5.			
Appendix	reference:	Exhibit	A7.5
[CONFIDENTIAL		–	commercially sensitive information]

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

SECTION B: Sales

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

B1 Sales

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

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

JHKT has completed the table in subsection B1.1 – Upwards sales reconciliation of Section B of Annex II.			
Appendix	reference:	Exhibit	B1.1
[CONFIDENTIAL		–	commercially sensitive information]

B2 Captive sales

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

Not applicable. JHKT has no captive sales.
--

Appendix reference: N/A

B3 Sales

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

Figure 1. [CONFIDENTIAL – commercially sensitive information]

First, all domestic sales are made through [CONFIDENTIAL – commercially sensitive information: a related company] and sold to the first independent customers.

Second, the export sales for Hankook Tire Group can generally be classified into three types as following: [Non-confidential summary: Direct sales, indirect sales, direct sales without affiliated parties]

For like goods/goods subject to review (“**TBR**”), most of the export sales are conducted through direct or indirect sales [CONFIDENTIAL – commercially sensitive information].

Regarding export sales to the UK, these are primarily conducted through direct sales. [CONFIDENTIAL – commercially sensitive information]. This means that sales are made to the first independent customers through Hankook Tyre U.K. Ltd. (“**HKT UK**”) (affiliated UK sales corporation)

[Non-confidential summary – Explanations regarding a specific type of sales representing less than 0.5% of total sales quantity and made under exceptional circumstances].

Figure 2. [CONFIDENTIAL – commercially sensitive information]

Appendix reference: N/A

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

Both domestic sales and exports to the UK are to affiliated sales corporations [CONFIDENTIAL – commercially sensitive information] JHKT have categorised all customers in the sales data as “distributor”.

Appendix reference: N/A

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.

The terms of sale to domestic and export customers are as following:

Market	Customer category	Delivery term	Payment term	
			Code	Explanation
Domestic	Distributor [CONFIDENTIAL – commercially sensitive information]	EXW	Z100	[CONFIDENTIAL – commercially sensitive information]
Export	Distributor [CONFIDENTIAL – commercially sensitive information])	CIF or CIP	A030	[CONFIDENTIAL – commercially sensitive information]
			A120	[CONFIDENTIAL – commercially sensitive information]

Figure 3. Terms of sale to domestic and export (to the UK) customer

Regarding pricing, JHKT sets selling prices to the sales corporations at a level [**CONFIDENTIAL** – commercially sensitive information: non-confidential range 20 – 40%]. As far as the sales prices to the first independent customers are concerned, these are solely determined by the sales corporations[**CONFIDENTIAL** – commercially sensitive information].

Appendix reference: N/A

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.

The sales process of Hankook Group can generally be classified into two types, as follows:

*Figure 4. [**CONFIDENTIAL** – commercially sensitive information]*

[Non-confidential summary: Depending on the sales terms agreed with the client, the shipment method may vary. In both sales type, the customers negotiate the sales conditions with the sales corporation.]

The sales process is the same for both exports to the UK and domestic sales. **[CONFIDENTIAL – commercially sensitive information on pricing policy]**.

The pricing negotiations on the sales price to first independent customers are solely conducted between HKT UK and the client. **[CONFIDENTIAL – commercially sensitive information]**. These discount rates and trading terms are ultimately determined based on on agreements reached with the customers.

In addition to this, certain customers in the retail sales channel are offered a volume rebate **[CONFIDENTIAL – commercially sensitive information]**.

[CONFIDENTIAL – commercially sensitive information].

Appendix reference: N/A

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 Subject to Review, including the terms, price changes and renegotiation by either side, etc. Explain the requirements on either party, should the contract be terminated early.

With regard to sales between JHKT and sales corporations (i.e., HKT UK and SHT):

There are no framework sales contracts (neither individual sales contracts nor long-term framework contracts) between JHKT and the sales corporations. **[CONFIDENTIAL – commercially sensitive information]**

Since JHKT and the sales corporations are part of the same corporate group, there is no contractual relationship determining the condition of the contract renegotiation, terms and price modifications, early termination.

With regard to sales between sales corporations (i.e., HKT UK and SHT) and independent customers:

As mentioned above (i.e., Section B3.4), the sales corporations can conclude longterm and short-term contracts with their customers. The contracts and prices are determined as a result of individual negotiations and they depend on various factors, **[CONFIDENTIAL – commercially sensitive information on Pricing policy]**.

In relation to sales to UK unrelated customers, negotiations on sales prices to independent customers in the UK are conducted solely between HKT UK and the client. **[CONFIDENTIAL – commercially sensitive information]**.

In addition to this, certain customers in the retail sales channel are offered a volume rebate **[CONFIDENTIAL – commercially sensitive information]**.

Appendix reference: N/A

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.

The production scheduling of the manufacturing corporations of Hankook Group, including JHKT, is primarily managed at central level by the Korean headquarters.

[Non-confidential summary: The production scheduling is determined based on various criteria such as global demand and factory capacity].
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Appendix reference: N/A

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 Subject to Review or among customers, regions or time periods.

JHKT, as a producer, does not have a list of prices that is applied in its sales to the affiliated sales corporations.
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For reference, JHKT has attached a copy of the price list [CONFIDENTIAL – commercially sensitive information].
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Appendix reference: Exhibit B3.7 [CONFIDENTIAL – commercially sensitive information]

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.

For the general procedure of sales through associated companies, please refer to the answer provided in response to Question 4 of Section B3 (above).

[Non-confidential summary: Regardless of the sales type agreed between the customers and the sales corporations, the invoice date between the producer and the sales corporation doesn't change. However, the invoice date of the sales between HKT UK and the customers varies depending on the sales type mentioned in Section B3.4. HKT UK receives payment based on the payment terms agreed upon individually with customers.]
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Appendix reference: N/A

B4 Sales Transactions

B4.1 UK Sales

In this part, you must provide complete information on sales of the Goods Subject to Review 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 **B4.1 – Sales to the UK, Annex II**. For instructions on filling out and explaining the adjustments for sales to the UK, please see **Section C**, subsection **C1 – Adjustments for export sales to the UK**
 - Report each good sold on a given invoice with a different PCN (see Section A on Product Control Numbers) or invoice line, as a separate transaction. If there are any other sales costs, charges or expenses incurred which have not been identified in the table above, add a column for each item (see 'other factors'). For example, other selling expenses incurred.

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

JHKT has completed the table in subsection [CONFIDENTIAL – commercially sensitive information].

Appendix reference: N/A

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 **B4.1 – Sales to the UK, Annex II**.

All export sales to the UK are conducted exclusively on [CONFIDENTIAL – commercially sensitive information].
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[CONFIDENTIAL – commercially sensitive information].
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Appendix reference: Exhibit B4.1.2 [CONFIDENTIAL – commercially sensitive information]

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 Subject to Review. In detail, explain the types of costs listed.

JHKT pays most of the selling expenses related to the export sales, including the transportation cost, after-sales costs and commissions [**CONFIDENTIAL** – Commercially sensitive information on sales costs].

First, [**CONFIDENTIAL** – commercially sensitive information].

Second, [**CONFIDENTIAL** – commercially sensitive information].

Appendix reference: N/A

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.

JHKT has provided the complete set of documents for sample invoices in Exhibit B4.1.4

Appendix reference: Exhibit B4.1.4
[CONFIDENTIAL – commercially sensitive information]

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 the People's Republic of China in **Section B – Sales**, subsection **B4.2 – 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).

Please note that JHKT has completed this section of the questionnaire, (i.e., B4.2) and the corresponding table of [CONFIDENTIAL – commercially sensitive information], solely in relation to its sales to [CONFIDENTIAL – commercially sensitive information], an associated reseller in the exporting country. Concerning domestic sales to independent customers, please refer to the corresponding sections of the questionnaire and [CONFIDENTIAL – commercially sensitive information] as completed by [CONFIDENTIAL – commercially sensitive information].

Appendix reference: N/A

Report each goods sale on a given invoice with a different PCN (see Section A on Product Control Numbers) or invoice line as a separate transaction.

If there are any other sales costs, charges or expenses incurred which have not been identified in the table above, add a column for each item (see 'other factors'). For example, other particular selling expenses incurred.

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

2. Select two invoices from two different customers regarding sales to domestic customers during the POI. Provide a complete set of documents for these sales. For example:

- purchase order.
- order acceptance.
- commercial invoice.
- applicable discounts or rebates.
- credit/debit notes.
- long or short-term contract of sale.
- inland freight contract; and
- bank documents showing proof of payment.

JHKT provides the complete set of documents for sample invoices in Exhibit B4.2.

Appendix reference: Exhibit B4.2
[CONFIDENTIAL – commercially sensitive information]

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.

For export sales, the transaction currency is converted to accounting currency (RMB) based on the exchange rate on the invoice date in SAP. As explained above, the invoice date is the date of product shipment. The daily exchange rate data in SAP is provided in Exhibit B5.

Appendix reference: Exhibit B5
[**CONFIDENTIAL** – commercially sensitive information]

B6 Sales to other 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.

JHKT has completed the table in [**CONFIDENTIAL** – commercially sensitive information].

Appendix reference: N/A

SECTION C: Fair comparison

If the TRA decide that it is appropriate to recalculate, we will conduct a fair comparison between the normal value and the export price of the Goods Subject to Review. In some cases adjustments may be required. When you make any adjustment claim, you will need to show how the issue you raise affects price comparability.

In Section C, please give details of any adjustments you want to claim and information you can provide to verify these adjustments. Please keep a record of the information you provide to facilitate subsequent verification.

This section is divided into subsections **C1 – Adjustments on export sales to the UK** and **C2 – Adjustments on domestic sales in the People’s Republic of China**. 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 **B4.1 – Sales to the UK, Annex II**. The following questions relate to the adjustments provided in this annex. If they are not applicable, then please state this in the relevant box.

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

Not applicable. [CONFIDENTIAL – commercially sensitive information].
[CONFIDENTIAL – commercially sensitive information].
Appendix reference: N/A

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

Not applicable. Please refer to above answer.
Appendix reference: N/A

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.

The transportation expenses incurred during JHKT's exports to the UK, categorized by Incoterms, include the following items:

Incoterms	Item	G/L Account Code	G/L Account Name
[CONFIDENTIAL – commercially sensitive information]	Domestic Freight (Plant to port)	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
[CONFIDENTIAL – commercially sensitive information]	Ocean Freight	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
[CONFIDENTIAL – commercially sensitive information]	Insurance	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
[CONFIDENTIAL – commercially sensitive information]	Forwarding Charge	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
[CONFIDENTIAL – commercially sensitive information]	Handling Charge	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]
[CONFIDENTIAL – commercially sensitive information]	Inland Freight in the UK (Port to Customer)	[CONFIDENTIAL – commercially sensitive information]	[CONFIDENTIAL – commercially sensitive information]

* As explained above, the inland freight in the UK under [CONFIDENTIAL – commercially sensitive information] incoterms is included in ocean freight.

Figure 5. Transportation expense by incoterms

For the detailed calculation of each expense, please refer to Exhibits C1.3.1-3

Appendix reference: Exhibits C1.3.1-3
[CONFIDENTIAL – commercially sensitive information]

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.

Since JHKT does not [CONFIDENTIAL – commercially sensitive information]. Therefore, JHKT uses the interest rate for short-term borrowings published by the Bank of China. For the supporting document, please refer to Exhibit C1.4.1 and C1.4.2.

JHKT tracked the AR Clearing date until April 2023. For transactions that were not cleared by April 2023, JHKT applied the end date of the POI (i.e., 31/12/2022) to calculate the credit period.

JHKT reported credit expenses according to credit period from the invoice date to payment date on a transaction specific basis as follows:

Credit expense = Net sales amount X interest rate on short term borrowings (*) X credit period / 365

(*) The short-term interest rate is the interest rate published by the Bank of China.

Credit period = Account receivable clearing date - billing date

JHKT also submits sample calculation of credit expense in Exhibit C1.4.2.

Appendix reference: Exhibit C1.4.1 and Exhibit C1.4.2. [CONFIDENTIAL – commercially sensitive information]

5. For the reporting of:

- differences in after sales costs;
- differences in commissions paid regarding sales under consideration; and
- any other adjustments made for differences not provided for in the above.

Please state:

- what the basis of the adjustment is; and
- how are the adjustments are reported.

In JHKT's exports to the UK, there are additional expenses, such as [CONFIDENTIAL – commercially sensitive information]. For detailed explanations regarding [CONFIDENTIAL – commercially sensitive information], please refer to the response in subsection B4.1.3. As for [CONFIDENTIAL – commercially sensitive information]. The detailed calculation methods for each cost can be found in Exhibits C1.5.1 — C1.5.2. For the [CONFIDENTIAL – commercially sensitive information] please refer to Exhibit C1.5.3.

Appendix reference: Exhibit C1.5.1a, Exhibit C1.5.1b, Exhibit C1.5.2, and Exhibit C1.5.3. [CONFIDENTIAL – commercially sensitive information]
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C2 Adjustments on domestic sales

Please make adjustments for each transaction in the relevant columns of the transaction-by-transaction lists requested in **Section B – Sales, B4.2 – Domestic sales, Annex II**. All charges must be reported in your accounting currency.

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

JHKT has [CONFIDENTIAL – commercially sensitive information on sales strategy] .

Appendix reference: N/A

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

Please refer the above question's answer.

Appendix reference: N/A

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.

<p>JHKT has reported actual expenses on a transaction-specific basis for all expenses stated above. Freight in the exporting country is recorded as [CONFIDENTIAL – commercially sensitive information – internal accounting]. There are two sales types in the domestic market.</p>

<p>For [CONFIDENTIAL – commercially sensitive information] billing, all freight costs were paid by JHKT [CONFIDENTIAL – commercially sensitive information]. JHKT provides the calculation of the freight cost for the [CONFIDENTIAL – commercially sensitive information] billing in Exhibit C2.3A.</p>

For [CONFIDENTIAL – commercially sensitive information], JHKT ships the products to [CONFIDENTIAL – commercially sensitive information]warehouse. This freight cost is also borne by the JHKT. In the case of [CONFIDENTIAL – commercially sensitive information]. JHKT provides the calculation of the freight cost for the [CONFIDENTIAL – commercially sensitive information] billing in the Exhibit C2.3B.

Appendix reference: Exhibit C2.3A and Exhibit C2.3B [CONFIDENTIAL – commercially sensitive information]

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.

JHKT produces the products uniquely with reference to its product code, regardless of the market in which the product is to be sold. Therefore, there is no physical difference between the tyres.

Appendix reference: N/A

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.

During the POI, JHKT sold the products only to [CONFIDENTIAL – commercially sensitive information]. Therefore, there is no difference in the levels of trade.

Appendix reference: N/A

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

The only packaging performed on the subject merchandise is the affixing of a label or sticker to the tyre's exterior. JHKT calculates the average unit packing cost. The packing expense label account is recorded as [CONFIDENTIAL – commercially sensitive information]and divided by the total number of tyres sold during the transaction review period. JHKT provides the sample calculation of packing costs in the domestic market in Exhibit C2.6.

Appendix reference: Exhibit C2.6 [CONFIDENTIAL – commercially sensitive information]
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7. For adjustments for import charges please do the following:

- provide original and English translations of statutes and regulations authorising duty drawback on exported goods and the governing methods used to calculate duty drawback.

JHKT provides the original and English translations of statutes and regulations authorising duty drawback on export goods in Exhibit C2.7.
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Appendix reference: Exhibit C2.7 [CONFIDENTIAL – commercially sensitive information]
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8. Please explain the method you used to connect the duty drawback amount to the specific UK sale and to third country sales.

<p>In contrast to the usual duty drawback system, where customs duties on raw materials used for producing export goods are refunded upon exporting the final products, China follows a different approach. In China, an exemption is initially granted for import duties on raw materials that are expected to be used in producing export goods. However, the company pays import duties for raw materials used to produce the domestic goods at the time of importing the raw materials.</p>

<p>Later, after the quantity of raw materials actually used in the manufacturing process is determined, the final customs duties for the import of raw materials are calculated and settled accordingly. For instance, if the exempted import raw materials were actually used for the domestic product, the company is required to pay the relevant import duties. On the other hand, if the quantity of the raw materials used for the products for export is less than the quantity for which imported duties were exempted in advance after production, additional import duties will be required to be paid on the difference. This system allows for upfront duty exemption on materials intended for export production, and the actual duties are adjusted based on the verified usage.</p>
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Appendix reference: N/A

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

As indicated in response to Question 8 of Section C2 (above), JHKT paid import duties on the raw materials used in domestic products. JHKT internally recorded
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[CONFIDENTIAL – commercially sensitive information]. JHKT provides the additional import charges in Exhibit C2.9.

Appendix reference: Exhibit C2.9 [CONFIDENTIAL – commercially sensitive information]

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.

Not applicable. JHKT does not claim any indirect taxes.

Appendix reference: N/A

- 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.

Not applicable.

Appendix reference: N/A

- 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.

Not applicable.

Appendix reference: N/A

- 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.

Not applicable.

Appendix reference: N/A

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.

JHKT reported credit expenses according to credit period from the invoice date to payment date on a transaction specific basis as follows:
 Credit expense = Net sales amount X interest rate on short term borrowings (*) X credit period / 365
 (*) The short-term interest rate is the interest rate published by the People's Bank of China.
 Credit period = Account receivable clearing date - billing date
 JHKT provides the sample calculation of credit expense in Exhibit C2.11.

Appendix reference: Exhibit C2.11
[CONFIDENTIAL – commercially sensitive information]

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.

JHKT incurred warranty expenses on claims by its domestic customers through **[CONFIDENTIAL – commercially sensitive information]**. When **[CONFIDENTIAL – commercially sensitive information]** received the claims from its customers, it investigated the claims. If **[CONFIDENTIAL – commercially sensitive information]** accepted any claims, **[CONFIDENTIAL – commercially sensitive information]** collected and scrapped the tyres concerned. After that, JHKT paid for those tyres or sent new tyres. To report warranty expenses, JHKT identified warranties claimed and paid by JHKT during the POI on a material code basis. JHKT calculated the average ratio of warranty by each tyre material. The warranty expense label account is recorded as **[CONFIDENTIAL – commercially sensitive information]**. JHKT divided by the total sales amount during the POI for each material. JHKT provides the sample calculation of warranty expense in the domestic market in Exhibit C2.12.

[CONFIDENTIAL – commercially sensitive information].

Appendix reference: Exhibit C2.12
[CONFIDENTIAL – commercially sensitive information]

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

Not applicable. JHKT does not pay any commissions in the domestic market.
Appendix reference: N/A

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.

Not applicable.
Appendix reference: N/A

SECTION D: Costs and performance

D1 Turnover

1. Please complete **Section D – Costing Information**, subsection **D1 – Turnover**, **Annex II** by reporting your total sales after all discounts and excluding taxes, for the injury period.
 - If your company accounts are consolidated with accounts of associated companies, create a copy of the table to report **total group** turnover.
 - The total turnover must reconcile with the turnover in your financial reporting (accounts).

D2 Statement of profit and loss and other comprehensive income

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

Please note that JHKT has included the inventory value variance, i.e., the difference between cost to make and cost of goods sold in the field “other operating expense”. The selling, administrative and general expenses, interest income/expense, extraordinary gains/losses and abnormal gains/losses are distributed by proportion of the sales amount of goods subject to review and like goods to total sales. The detailed calculation worksheet is provided in **Exhibit D2.1**.

Appendix reference: Exhibit D2.1
[CONFIDENTIAL – commercially sensitive information]

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.

These are provided in **Exhibit D2.2A** and the reconciliation between the income statement and the income tax statements is provided in **Exhibit D2.2B**.

Appendix reference: Exhibit D2.2A, Exhibit D2.2B
[CONFIDENTIAL – commercially sensitive information]

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.

JHKT has only one facility, which is at the same location as the company address provided in Section A1. The detailed description of JHKT's production facilities is provided in Exhibit D3.1.

Appendix reference: Exhibit D3.1
[CONFIDENTIAL – commercially sensitive information]

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

The production process is composed of eight stages, as follows:

1. **Mixing / Refining process:** In mixing process, raw materials and secondary materials are inputted and mixed, and produce the rubber for tire as compound.
2. **Extrusion process:** In extrusion process, mixed rubber to be produced in mixing is inputted; produce the tread that is part to face the ground in tire and the sidewall that is part to compose both sides in tire.
3. **Beading process:** Steel wires are coated with the rubber compound to produce beads. They are used to fix the tyre onto the wheel.
4. **Rolling (Calendering) process:** In rolling process, textile cords and steel cords that insert to space between tread and inner rubber are produced.
5. **Cutting process:** The stuff produced in rolling process and extrusion process is cut by specifications finished goods.
6. **Building process:** The components produced from the above processes are assembled to produce cylindrical green tyres.
7. **Curing (Molding) process:** In curing process, the major tasks of the process are that green tire is strengthened the quality of the product, and marking company, specification etc.
8. **Inspection:** Lastly, the finished goods are inspected.

The flowchart illustrating the production process of the goods subject to review is provided in **Exhibit D3.2**. [CONFIDENTIAL – Commercially sensitive information on company production process].

Appendix reference: Exhibit D3.2
[CONFIDENTIAL – commercially sensitive information]

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 Goods Subject to Review are mainly made from natural rubber, synthetic rubber, carbon black and steel cord, which account for more than [CONFIDENTIAL – commercially sensitive information: non-confidential range 2% - 10%] of the manufacturing cost. JHKT has been sourcing carbon black from [CONFIDENTIAL – commercially sensitive information] in the domestic market. The other major raw materials have been purchased or imported from [CONFIDENTIAL – commercially sensitive information]. Please refer to the two types of affiliated transactions as below.

[CONFIDENTIAL – commercially sensitive information]
Figure 6. [CONFIDENTIAL – commercially sensitive information]

[CONFIDENTIAL – commercially sensitive information]
[CONFIDENTIAL – commercially sensitive information].

As shown above, JHKT mainly imports natural rubber and synthetic rubber. Natural rubber is imported from [CONFIDENTIAL – commercially sensitive information]. JHKT imports special types of synthetic rubber that are technically impossible to produce in China, i.e., [CONFIDENTIAL – commercially sensitive information]. The input values of raw materials include all costs, such as import charges and indirect taxes incurred before the raw material use.

Appendix reference: N/A

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

JHKT produces [CONFIDENTIAL – commercially sensitive information] types of products: [CONFIDENTIAL – commercially sensitive information: product not subject to review], for light truck (**LTR**), and for truck and bus (**TBR**). Of these products, LTR and TBR both fall within the Goods Subject to Review. JHKT classified tyres

[**CONFIDENTIAL** – commercially sensitive information]. Please refer to **Exhibit D3.3** for all such products produced by JHKT during the POI.

JHKT does not have the ability to switch production and cannot produce the Goods Subject to Review in a production line where other goods are produced.

Appendix reference: Exhibit D3.3
[CONFIDENTIAL – commercially sensitive information]

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.

Please note that it is extremely burdensome for JHKT to trace where and when products produced during the injury period were sold. Therefore, the cost of production of the Goods Subject to Review sold in domestic, UK and third country markets are calculated by the proportion of sales volumes in 2022.

Appendix reference: N/A

D5 Capacity

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

Explain your calculation of the capacity and the capacity utilisation for the Goods Subject to Review. 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.)

JHKT provides a capacity table in Annex II – Table D5. JHKT calculated capacity and capacity utilization of LTR and TBR production lines as following:

- 1) Capacity = Planned working days x Daily production capacity (EA)
- 2) Capacity utilization = Actual production quantity (EA) / 1) Capacity

Each tyre is produced through a total of four processes: **[CONFIDENTIAL – commercially sensitive information]**. Please refer to **Exhibit D5** for the detailed calculation.

Appendix reference: Exhibit D5 [CONFIDENTIAL – commercially sensitive information]
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D6 Stocks

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

JHKT provides the details on stocks of the Goods Subject to Review in Table D6 of Annex II. JHKT does not purchase any Goods Subject to Review, therefore this question is not applicable.

Appendix reference: N/A

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

From 2020 to 2021, the inventory-sales ratio was **[CONFIDENTIAL – commercially sensitive information: non-confidential range 8-15%]** as sales performance was low due to the influence of the COVID-19 pandemic. However, the economy started to recover in 2022, leading to a larger increase in sales than the growth in production. As a result, the inventory-sales ratio is reduced to the **[CONFIDENTIAL – commercially sensitive information: non-confidential range 2.5% - 7.5%]**.

JHKT usually manages inventory-sales ratio at a level as low as possible in order to reduce any costs related to inventory maintenance.

Appendix reference: N/A

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 Subject to Review and like goods.

No by-products are generated from the Goods Subject to Review. A variety of scrap is generated during the production of TBR tyres, which is either sold to unaffiliated parties or disposed of by unaffiliated waste disposal service providers. While JHKT [CONFIDENTIAL – commercially sensitive information]. In addition, some scraps, such as [CONFIDENTIAL – commercially sensitive information: example] generated mainly from an overlap during the [CONFIDENTIAL – commercially sensitive information: production process].

[CONFIDENTIAL – commercially sensitive information: accounting policy].

The ratio of waste and scrap cannot be calculated only for the Goods Subject to Review and like goods. Therefore, the ratio is calculated by the proportion of total weight of waste and scrap generated from the production of all finished goods relative to the total weight of production. Please refer to **Exhibit D7** for the waste and scrap ratio calculation.

Appendix	reference:	Exhibit	D7
[CONFIDENTIAL	–	commercially	sensitive information]

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

All products (regardless of whether these are Goods Subject to Review or non-subject goods) share a joint process from [CONFIDENTIAL – commercially sensitive information]. They diverge after [CONFIDENTIAL – commercially sensitive information].

Appendix reference: N/A

3. Please explain how your costs of production (per unit) differ between the Goods Subject to Review 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.

The costs of production for each product (whether these are Goods Subject to Review or non-subject goods) are calculated according to the product code-specific bill of materials (BOMs). As mentioned above, all products share a joint process from [CONFIDENTIAL – commercially sensitive information]. At the point of divergence, the [CONFIDENTIAL – commercially sensitive information].

Appendix reference: N/A

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.

JHKT does not purchase any Goods Subject to Review and therefore Section D – Costing information , subsection D8 – Purchases, Annex II is not applicable.

Appendix reference: N/A

2. Within your company, do you use any integrated processes in the production of the Goods Subject to Review? If so, please explain.

[CONFIDENTIAL – commercially sensitive information]

Appendix reference: N/A

D9 Profitability and administration, selling and general costs

1. Please complete **Section D – Costing information**, subsection **D9 – Profitability, Annex II**.
2. Please explain how you calculate profitability for the Goods Subject to Review/like goods, referring to your accounting and bookkeeping methods. Attach a breakdown to show how you have calculated the figures in **D9 – Profitability**.

A calculation worksheet is provided in Exhibit D9 . [CONFIDENTIAL – commercially sensitive information].

Appendix reference: Exhibit D9 [CONFIDENTIAL – commercially sensitive information]

D10 Cost to make (CTM) in the People's Republic of China

1. Please provide the CTM for your domestic market (the People's Republic of China) by completing **Section D – Costing information**, subsection **D10.1 – CTM in the People's Republic of China**.
 - Provide details for each PCN of your goods during the POI, produced by your company or an associated party.
 - For each associated party, make a new copy and complete the spreadsheet annex separately.
 - Note that subheadings of each line item (e.g. raw materials, energy) can be changed to suit the categorisation of your own cost accounting system.
2. If there are differences in production costs for the same PCN between your like goods and the Goods Subject to Review, explain the reasons for the differences.

As mentioned in Question 3 of Section D7, production costs for each product (whether Goods Subject to Review or non-subject goods) are calculated according to the product code-specific bill of materials (BOMs). Therefore, if there is a difference in production costs for the same PCN between the like goods and the Goods Subject to Review, it is caused by a difference in BOM, not by any differences in the physical characteristics.

Appendix reference: N/A

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)

JHKT utilises [**CONFIDENTIAL – commercially sensitive information**].
 [**CONFIDENTIAL – commercially sensitive information: cost accounting**]

Appendix reference: N/A

4. 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.

During the POI, JHKT did not perform any start-up operations or incur any ramp up costs. Therefore, this question is not applicable.

Appendix reference: N/A

5. 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.

JHKT finances production of like goods by [CONFIDENTIAL – commercially sensitive information]

Appendix reference: N/A

D11 Administrative, Sales and General (AS&G) in the People's Republic of China

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 for domestic market.
 - Provide details for each cost type of goods produced during the POI, by your company or an associated party.
 - Note that subheadings of each line item (e.g., sales commissions, supply and client) must be changed to suit the categorisation of your own cost accounting system.
2. Please explain the cost allocation and apportion method used for each cost type for the POI, including an explanation of that allocation and apportion method under each cost type.

Please refer to the cost allocation method for each cost type as below.

1. Selling costs

[CONFIDENTIAL – commercially sensitive information: details on the company's cost allocation].

2. Administrative and general costs

[CONFIDENTIAL – commercially sensitive information: details on the company's cost allocation].

[CONFIDENTIAL – commercially sensitive information: details on the company's cost allocation]. Please refer to our comments in Annex II Table D11.1 for more details.

Appendix reference: N/A

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

Except for certain expenses, AG&S expenses are allocated [CONFIDENTIAL – commercially sensitive information: details on company's cost allocation].

Appendix reference: N/A

D12 Raw material (RM) and major input purchases

1. Please complete **Section D – Costing information**, subsection **D12 – RM purchased, Annex II** detailing the RM and major input purchases accounting for >5% of the total cost to make and sell (>1% if energy for energy related costs) during the POI

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.

Please refer to Exhibit D12.1A for purchase invoices and Exhibits D12.1B and D12.1C for contracts of two purchase samples.

Appendix reference: Exhibit D12.1A, D12.1B and D12.1C [CONFIDENTIAL – commercially sensitive information]

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'.

As already mentioned in Question 3 of Section D3, JHKT purchases almost all its materials from [CONFIDENTIAL – commercially sensitive information: non-confidential range 65% - 95%]. In the column I of Table D12 of Annex II, JHKT reported the original source or actual manufacturer of raw materials.
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Also, JHKT purchases materials from [CONFIDENTIAL – commercially sensitive information] which is responsible for intermediary trade between JHKT and actual suppliers. Pursuant to [CONFIDENTIAL – commercially sensitive information][CONFIDENTIAL – commercially sensitive information: non-confidential range 1-5%].

When there is a shortage of raw materials in stock, JHKT occasionally purchases these from [CONFIDENTIAL – commercially sensitive information]. Pursuant to [CONFIDENTIAL – commercially sensitive information][CONFIDENTIAL – commercially sensitive information: non-confidential range 3 – 8%]. [CONFIDENTIAL – commercially sensitive information].

For the purchase from associated suppliers, the field “associated supplier CTM” is added to provide the cost to make of the material by the associated suppliers. In this field, the actual purchase price of [CONFIDENTIAL – commercially sensitive information]and the average unit cost of inventories of [CONFIDENTIAL – commercially sensitive information]is included. Please refer to the field “mark-up” (see Section D12 of Annex II) for how much margin was added to the actual purchase price of the associated suppliers.

Appendix reference: N/A

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.

JHKT purchases raw materials from [CONFIDENTIAL – commercially sensitive information]mainly through two types of contractual arrangement, [CONFIDENTIAL – commercially sensitive information].

Appendix reference: N/A

D13 Specificities regarding the exporting country

In addition to the questions below exporters should also complete **Annex III** and provide the requested evidence.

The European Commission Staff working document on the People's Republic of China for the purposes of trade defence investigations, includes evidence that the GOC interferes with the decision-making processes of private and state-owned companies in pursuance of goals that reflect the GOC’s interests rather than the free market (p.39).

Please comment on these claims and describe the GOC influence and or control over internal company decision making. If there are specific producers of Bus and Lorry Tyres over which the GOC has control or influence regarding internal company decision-making, it would be helpful if you can name those producers.

There is [**CONFIDENTIAL** – Commercially sensitive information]. JHKT could not obtain any information on the producers of bus and lorry tyres influenced by the GOC regarding internal company decision-making.

Hankook Group is in [**CONFIDENTIAL** – Commercially sensitive information]. Hankook Group's [**CONFIDENTIAL** – commercially sensitive information: meaningful summary: majority] of the shares of JHKT.

Appendix reference: N/A

The European Commission Staff working document on the People's Republic of China for the purposes of trade defence investigations, includes evidence that the GOC intervenes in the economy to support industries that it deems strategic (see e.g., p 14).

Please comment on these claims, and describe any government measures, policies, laws or directives (including regional and industry specific measures) that have impacted any aspect of the production and sale, whether domestically or for export, of Bus and Lorry Tyres during the injury period, 1 January 2019 to 31 December 2022. If any of these government measures have ceased, please indicate when this occurred.

There are no government measures, policies, laws or directives that have impacted any aspect of the production and sales of bus and lorry tyres during the injury period.

Appendix reference: N/A

Please provide an explanation, plus any supporting evidence, for each of the following areas to show that these costs/prices are determined by open market conditions. Where costs/prices may be low please offer an explanation, plus any supporting evidence, of the cause.

1. **Exporters access to bank financing.** Please describe any capital benefits distributed to exporting producers by a government department, agency, institution, or SOE bank (including investment, loans or grants), motivated by non-market forces, during the POI 1 January 2022 to 31 December 2022. This

includes access to finance granted by institutions which implement public policy objectives or otherwise not acting independently of the State.

JHKT [**CONFIDENTIAL** – Commercially sensitive information] except the short-term borrowing using [**CONFIDENTIAL** – Commercially sensitive information]

Appendix reference:

2. **Chinese exporters preferential tax regimes.** Please describe any preferential tax rules which benefit producers and/or exporters of Bus and Lorry Tyres.

During the POI, JHKT has received a total of three types of preferential tax rate. However, these tax benefits are not specific to the TBR industry, but rather a result of government taxation policy reforms.

[**CONFIDENTIAL** – commercially sensitive information].

Appendix reference:

3. **Chinese exporters beneficial energy prices.** Please describe any influence that any government department, agency or institution, has had on the energy costs incurred by producers within the bus and lorry tyre industry. This may include:
- a. Information about whether government agencies regulate electricity, coal or gas prices, including how these are regulated.
 - b. How electricity prices are determined for different provinces and industries.

There is no influence that any government department, agency or institution has had on the energy costs incurred by JHKT within the bus and lorry tyre industry. Therefore, JHKT does not derive any benefits from government related organizations.

The energy prices of JHKT are determined by market forces, which means that there are no significant distortions affecting energy prices. JHKT generally compares electricity prices of 2~5 suppliers through a bidding process and signs a contract with a supplier who provides electricity at a competitive price. JHKT also purchases gas through a non-public entity and the purchase price reflects the conditions of the Chinese local market. There is no indication that the energy prices are not determined by market forces and JHKT receives no preferential treatment regarding energy.

Appendix reference: N/A

4. **Chinese exporters beneficial labour costs.** Please provide information on any government intervention in the labour market, within the Bus and Lorry Tyre Industry. This includes:
- a. Laws or government policy affecting the formation and operation of Trade Unions.
 - b. Laws or government policy affecting wages or salaries (including minimum or maximum wage rates).
 - c. Government intervention in the hiring or dismissal of employees working for Bus and Lorry Tyre producers.

There are no laws or government policy affecting either the formation or operation of Trade Unions, or wages and salaries, within the bus and lorry tyre industry. There is also no government intervention in the hiring or dismissal of employees working for bus and lorry tyre producers. Please refer to **Exhibit D13.4** for more detailed information.

Appendix reference: Exhibit D13.4
[CONFIDENTIAL – commercially sensitive information]

5. **Chinese exporters beneficial raw material prices.** Please describe any influence that any government department, agency or institution, has had on the raw material costs incurred by producers within the Bus and Lorry tyre industry.

The costs of raw materials used in the manufacture of tyres are not affected by any government intervention. In particular, no significant distortions affecting the markets for the raw materials in China could be identified.

First, neither the price for the main raw materials (namely **[CONFIDENTIAL – commercially sensitive information: examples]**) nor the price of other materials is regulated or otherwise influenced by government intervention in China. Therefore, there is no indication whatsoever that the price of these materials in China is not the result of market forces.

Second, there are no distortions affecting the raw material prices of JHKT. The price actually paid by JHKT to buy **[CONFIDENTIAL – commercially sensitive information: examples]** is in line with international benchmarks. It follows that JHKT's raw material price is undistorted.

Appendix reference: Exhibit D13.5 [CONFIDENTIAL – commercially sensitive information]

6. **Chinese exporters beneficial land costs.** Please describe any government intervention that has occurred in the allocation or sale of land to producers within the Bus and Lorry Tyre Industry (which has been used in the production and/or export of the like good or goods subject to review). This may include (but is not limited to) discounts or preferential contract terms and may be a result of provincial or industry specific government policies.

JHKT purchased the land use right from the government through the procedure of general land transaction. The land price was established by [CONFIDENTIAL – commercially sensitive information] . The acquisition of land use rights is not conditioned on the fulfilment of any requirements other than what are required by the laws.

Appendix reference:

7. Please provide any information which you believe is relevant and would like us to consider as part of our determination on whether a Particular Market Situation exists in the Bus and Lorry tyre industry in your country.

Although JHKT operates in China, it should be highlighted that JHKT is part of a Korean group and is therefore not subject to the intervention of the Government of China. Moreover, as explained in answers above, the majority of JHKT's inputs used in the production of the Goods Subject to Review was not sourced in China during the POI but from third countries. This circumstance excludes the existence of any distortions. In relation to the inputs sourced in China (e.g., energy), it should be recalled that the supplier is determined following a competitive procedure and, consequently, the relevant costs were thus substantially determined by market forces.
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Appendix reference:

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 may cause 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.

In considering the causes of injury allegedly suffered by the UK industry, it is important to recall that the UK industry exclusively produces retreaded tyres. As explained in HKT UK's response, there is no competitive relationship between retreaded tyres and the multi-life tyres exported by JHKT. This points to the conclusion that the AD measures should be terminated as regards multi-life tyres such as those produced and exported to the UK by JHKT.

As a subordinate ground, it is submitted that the measures should be revoked as such (i.e., as regards both multi-life and single-life tyres). In fact, while the Chinese tyres imported into the UK all new tyres, it should be recalled that there is no production of new tyres in the UK (whether multi-life or single-life). The UK industry is exclusively made of retreaders. Thus, imports of new tyres from China cannot cause any injury.

Appendix reference:

2. Would the cause(s) or degree of injury change if the existing anti-dumping measure on the goods subject to review were to no longer apply? Please describe the nature of any change and substantiate your claims with evidence.

Since the products that JHKT exports to the UK (i.e., multi-life tyres) are not produced in the UK, a demand for those products exists in any event. Therefore, in terms of quantities, it is unlikely that imports will be affected significantly if the anti-dumping measures were to no longer to apply. Thus, such imports cannot have any detrimental effect in terms of injury to the (non-existing) UK industry for new tyres.

By contrast, imports of multi-life tyres alleviate any injury allegedly suffered by the UK (retreading) industry since these are products which — although not produced in the UK — constitute the key raw material used by local retreaders in the UK.

Therefore, in terms of cause and degree of injury, exports of JHKT's multi-life tyres cannot produce any negative impact should the measures be revoked.

Appendix reference:

3. Please describe how you would expect to be affected, if the existing anti-dumping measure on the goods subject to review were to no longer apply, regarding:
- your exports of the goods subject to review to the UK
 - the market price of the goods in the UK

If the existing anti-dumping measure on the goods subject to review was to no longer apply, Hankook Group does not expect a significant increase in exports compared to the past four years. In fact, the sales within the UK are managed by Hankook's subsidiary HKT UK and are driven by UK demand, which is generally stable. In terms of prices in the UK, it should be emphasised that maintenance of AD or CVD measures on multi-life tyres exported by Hankook Group entails a higher cost for downstream industries (including the UK retreading industry, as well as transport and logistics companies) and ultimately consumers. Therefore, their removal would be highly beneficial to the UK economy as a whole.

Appendix reference: Exhibit E1
[CONFIDENTIAL – commercially sensitive information]

SECTION F: 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	✓

+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
Exhibit A2.4A [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A2.4B [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A2.4C [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A2.5 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A3.2A [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A3.2B [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A4.3A [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A4.3B [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A4.3C [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]

Exhibit A5.1 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A6.3A [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A6.3B [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A6.3C [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A6.3D [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A6.5 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A6.6 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A6.7 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A6.8A [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A6.8B [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A7.1 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit A7.5 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit B1.1 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit B3.7 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit B4.1.2 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit B4.1.4 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit B4.2 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit B5 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C1.3.1 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C1.3.2 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]

Exhibit C1.3.3 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C1.4.1 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C1.4.2 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C1.5.1a [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C1.5.1b [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C1.5.2 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C1.5.3 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C2.3A [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C2.3B [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C2.6 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C2.7 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C2.9 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C2.11 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit C2.12 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit D2.1 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit D2.2A [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit D2.2B [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit D3.1 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit D3.2 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit D3.3 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]

Exhibit D5 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit D7 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit D9 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit D12.1A [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit D12.1B [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit D12.1C [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit D13.4 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit D13.5 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]
Exhibit E1 [CONFIDENTIAL]	[CONFIDENTIAL – commercially sensitive information]