

Anti-Dumping Transition Review Questionnaire (UK Producer)

Case TD0061: Bicycles and certain bicycle parts originating in the People's Republic of China (including bicycles consigned from Cambodia, Indonesia, Malaysia, Pakistan, the Philippines, Sri Lanka and Tunisia)

Period of Investigation (POI):	<input type="text" value="1 July 2023 – 30 June 2024"/>
Injury period:	<input type="text" value="1 July 2020 – 30 June 2024"/>
Deadline for response:	<input type="text" value="4 December 2024"/>
Contact details:	<input type="text" value="TD0061@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="FROG BIKES LIMITED"/>

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 annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by 4 December 2024.

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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.

As part of our work, we are carrying out a transition review of each trade remedy measure active under the EU system that the United Kingdom (UK) has decided to maintain after EU exit.

This transition review will consider whether dumping of bicycles and certain bicycle parts originating in the People's Republic of China (PRC) and injury to the UK industry would be likely to continue or recur if the anti-dumping amount currently applicable were no longer applied to those goods.

Why should I take part?

We are asking domestic producers of bicycles to complete this questionnaire to inform our review of whether the current anti-dumping measure should be maintained or revoked.

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

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section below.

Please provide all the information requested by 04 December 2024. 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 TD0061@traderemedies.gov.uk.

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

Instructions on completing this questionnaire

Preparing your response

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

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

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

How to answer the questions

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

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why. If the answer to a question is "zero", "no" or "none", please write this.
- Please complete the spreadsheet annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this

information as appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.

- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g., 23/05/2019).
- Unless otherwise stated, 'year' or 'calendar year' refers to the period 1 January – 31 December and 'quarter' refers to the associated three-month periods (e.g., 1 January – 31 March, 1 April – 30 June, etc).
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g., do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g., '1,300' for one-thousand three hundred, '1,300,000' for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g., £1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of tax unless otherwise stated.
- Please refer to the case number, TD0061, in any correspondence with the TRA.

Preparing confidential and non-confidential versions

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annex by the due date. This is so that we can publish the non-confidential version of your information on our public file. **Please ensure that each page of information you provide is clearly marked either "Confidential" or "Non-Confidential" in the header.**

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

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential (e.g., the data is commercially sensitive).
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.

- If you do not provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

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

Providing information from subsidiaries or associated parties

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our investigation covers all subsidiaries and any other associated companies involved in the import, production, sale, R&D, distribution and/or supply of the like good and/or goods subject to 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 a UK producer of like goods, they should **also** complete a Producer questionnaire. Please make sure you provide your subsidiaries with access to it.
- Where your subsidiaries or associated companies are not producers but are involved in the sales of the like goods, your questionnaire response should include information from those companies.

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

What happens next

Once you have completed your questionnaire responses including the corresponding annex(es) and any additional documents requested, you must upload confidential and non-confidential versions through our [Trade Remedies Service](#). Following this:

- you will receive an email confirming the documents have been uploaded successfully
- the Case Team will contact you if further information is required
- the non-confidential responses will be placed on the public file; and

- the Case Team may contact you to arrange a visit to verify the information contained in your responses.

Verifying the information you supply

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

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

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

In some circumstances verification visits may be conducted remotely.

Please indicate any dates between December 2024 and March 2025, when you would be unable to host a verification visit.

<p><i>22 December to 1 January (inclusive)- Business is closed</i> <i>1 March to 12 March (inclusive)- End of Financial Year</i></p>

Appendix reference:

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

The scope of this review

Goods subject to review

This review covers bicycles and certain bicycle parts originating in the People's Republic of China (PRC), described as:

Category 1 Goods (Bicycles)

This transition review covers bicycles and other cycles (including delivery tricycles, but excluding unicycles), not motorised originating in the PRC (including bicycles consigned from Cambodia, Indonesia, Malaysia, Pakistan, the Philippines, Sri Lanka and Tunisia).

These goods are currently classifiable within the UK's following commodity codes:

87 12 00 30 10	87 12 00 30 90	87 12 00 70 92
87 12 00 30 20	87 12 00 70 91	87 12 00 70 99

These codes are only given for information.

Category 2 goods (certain bicycle parts)

This transition review also covers certain bicycle parts originating from the PRC, in quantities of 300 or more units per month (per type), including:

- brake levers
- coaster braking hubs
- complete wheels with or without tubes, tyres and sprockets
- crank-gear
- derailleur gears
- frames (painted, anodised, polished or lacquered)
- free-wheel sprocket-wheels
- front forks (painted, anodised, polished or lacquered)
- handlebars
- hub brakes

These goods are currently classifiable within the UK's following commodity codes:

87 14 91 10 31	87 14 93 00 19	87 14 99 10 99
87 14 91 10 35	87 14 94 20 99	87 14 99 50 91
87 14 91 10 39	87 14 94 90 19	87 14 99 50 99
87 14 91 30 35	87 14 96 30 90	87 14 99 90 19
87 14 91 30 39	87 14 99 10 89	

These 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

This questionnaire asks for information about your company's production and sales of goods which are **like** the goods subject to review. Any reference to **'like goods'** in this questionnaire refers to bicycles produced in the UK or imported to the UK from a country other than the PRC, Cambodia, Indonesia, Malaysia, Pakistan, the Philippines, Sri Lanka or Tunisia, which are like the goods subject to review 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 or goods subject to review.

Product Control Numbers (Category 1)

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.

In this questionnaire and the corresponding annex, you will be asked to assign PCNs representing the different types of category 1 products you produce or import. When stating your PCNs, please do not use any spaces, dashes or other means of separation, and ensure you follow the order of characteristics outlined in the table below. Please use this PCN structure consistently throughout your questionnaire response, including the corresponding spreadsheet annex.

Category	Type	Code
Bicycle type	ATB (all-terrain bicycles including mountain bicycles, above 24" wheel diameter)	A
	Foldable	F
	Junior action (BMX) and children's bicycles (24" and below)	J
	Road / Race (above 24")	R
	Trekking/city/hybrid/touring bicycles (above 24")	T
	Other (e.g. delivery, cargo, tricycle)	O
Suspension	None	0
	Front suspension	1
	Dual / full suspension	2
Frame material	Aluminium	A
	Carbon Fibre/Composite	C
	Steel (hi-tensile)	S
	Titanium	T
	Other	O
Fork leg material	Aluminium	A
	Carbon Fibre/Composite	C
	Steel (hi-tensile)	S
	Titanium	T
	Other	O
Gear type	None/fixed/single	N
	Internal (hub)	I
	Derailleur	D

Brake	Mechanical	M
	Hydraulic	H
EXAMPLE		
F2AADH	Foldable bicycle with dual suspension, an aluminium frame and fork, gears using a derailleur and Hydraulic brakes.	

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

Balance bikes (which are classed as toys according to EN71-1 and require CE marking) have no pedals or drive system (no chain, cranks, or gears) these characteristics could be added and therefore listed as "none" for balance bikes or alternatively balance bikes could be removed from the list altogether.

Track bikes which are excluded from the UK pedal cycle regulations and are designed for use strictly on velodrome tracks and not public roads have no brakes so the brake section could have "none" as an option and track bikes could either be listed in "other" or have their own category. We have used "0" (zero) in our return data.

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

Balance and Track bikes to the list of others or give it its own category.

Dropper seat posts, specialised suspension controls, extra gearing, racing tyres, and weight reduction in components are all specialised products to aid in high performance and may unduly influence the comparison.

It is important to note that for example, a hardtail Mountain bike (front suspension only) with a code A1AADH can be anything from £200 to £8,000 retail cost based on the quality, weight, material, and manufacturing process of the parts used.

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

Some other more expensive bikes have premium CNC machined parts which can be much more costly than the typical forged & Hydroformed parts instead of conventional extruding and bending (particularly brake and drive train components for CNC and frames/forks for Hydroforming) Other more expensive bikes use composite parts (Carbon) components other than frame & forks. Handlebars, wheels, seat posts, etc.

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:	Frog Bikes Limited
Legal structure (e.g., limited company, sole trader, partnership etc):	Limited Company
Year of establishment:	21/02/2012
Other operating names:	[REDACTED]
Company registration number:	07958824
Place of registration:	England & Wales
Name (point of contact):	[REDACTED]
[REDACTED]	[REDACTED]
Address:	Unit 3, Silwood Business Park, Buckhurst Road, Ascot, SL5 7PW
Telephone No:	[REDACTED]
Email:	[REDACTED]
Website:	www.frogbikes.com

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

Name:	n/a
Address:	
Telephone No.:	
Email:	
Confirm they have signed authority to act (Yes/No):	
Appendix reference: n/a	

A2 About your company

1. Describe the role of your company in the UK market for the like goods (e.g., producer, producer/exporter, producer/importer or producer/distributor).

Frog Bikes is the designer, manufacturer of light weight children's bicycles, we predominantly sell to Retail stores however, also sell direct to consumers, councils, cycle trainers, hotels, cycle clubs etc

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
28/02/2023	Transfer of Trade & Assets	Transfer of Trade & Assets of Frog Bikes Manufacturing (a subsidiary of Frog Bikes Limited) to Frog Bikes Limited. No change to overall operations of the group.

+Add additional rows as required.

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

Under General Product Safety Regulations, we need to have a suitable technical files that demonstrate our bikes are safe.

Appendix reference: A2-3 examples

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

*Frog Bikes test all Frog bikes to International Standards. Bicycles in UK and Europe only need to conform to GPSD, however, Frog Bikes go further to pass ISO Balance Bikes are CE approved and we test to 8098:2023
First Pedal pass ISO 8098:2023
Hybrid pass ISO 4210:2023
City pass ISO 4210:2023
Mountain pass ISO 4210:2023
Road pass ISO 4210:2023
Track pass ISO 4210:2023
ISO14001 had ISO9001*

Appendix reference:A2-4a, A2-4b, A2-4c,

5. Please describe all the other products (not including the like goods) produced or sold by your company in the UK.

*Balance Bikes (wheeled toys) spare parts & accessories for children's bicycles
Track Bikes which are specifically not for use on roads.....*

Appendix reference:A2-5a

6. 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.

Frog Bikes is a member of the following:
The Bicycle Association – this is the bicycle industry trade body
The FSB (Federation of Small Businesses)
MakeUK (Manufacturers association)
NBDA (National Bike Dealers Association) USA
People for Bike Coalition USA
Shift Cycling Culture
Accelerated Growth Program with Welsh Government
Frog Bikes have a Queen's Award and King's Award for Enterprise

Appendix reference:

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) or 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 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, sales, R&D, supply and distribution of the like goods for domestic and export markets.

See Org chart July 2024

Appendix reference: A3-1 Org Chart July 2024

2. Please provide a written summary and a diagram/flow chart, if available, of your production process for the like goods that you produce in the UK. Clearly indicate the different production stages carried out by your company.

See Frog Factory Video - <https://www.youtube.com/watch?v=mMhJ4oRk2tY>
Wheels – Hubs and Spokes are merged in our automated Hub Filler at about 1 hub in every 24 seconds

These filled hubs are then moved to a lacing machine with a Wheel Lacer who use the machine to place spokes into the rim

The wheels then are taped and trued by a robot

Finished wheels have a cassette added as well as Inner Tube and Tyre placed on and inflated.

The rear wheels are placed in a rack.

The front wheels have mudguards added, then placed in paper bags (packaging for protection) and then placed in the rack.

Frames and Forks have headsets pressed on to them at different stations.

Forks then have front brakes added and tested with the correct wheel

Frames then Bottom brackets added as well as crank-sets.

These frames then have rear brakes added as well as multiple bolts.

Frame and Forks are moved to the station where they are joined with stems and spacers.

Next chains are put on the frame crank set and moved to the production line.

These almost bikes, are sent down the line where rear wheels are added.

Handlebars are placed on the line with all cables for brakes and gears.

Gears are tested with the cranks spinning the rear wheel.

2. Provide a general description of the nature of competition within the overall UK market for the category 1 goods from the PRC and the category 1 like goods produced in the UK.

*UK competitors are split into the following groups:
Fellow specialist kids bike brands, these are for example the Austrian brand Woom, Early Rider, Isla bikes who closed in October 2023
Brands that have adult range that also produce kids bikes' Trek, Specialized, Cannondale, Tandem (who have the Squish brand)
Other manufacturers of bikes this included brands that inhouse for large retailers i.e sold in Evans and Halfords*

Appendix reference: A4-2

3. How price-sensitive is demand for the bicycles? In other words, to what extent will the overall demand for bicycles change in response to changes in price?

*As per the Market Data overview from the Bicycle Association:
Average Selling price has dropped since 2022, however, sales are the lowest they have been since 2019, demonstrating that lower prices does not mean higher volume of sales.
Data on propensity to cycle demonstrates that road safety is the barrier to increased cycling, not the price of the bike*

Appendix reference: A4-3

4. Do consumers buy from the cheapest producer, or are there other factors that influence their decision such as quality and service?

Consumers can be split into many segments. Some consumers are price sensitive and only buy the cheapest product. Others look at quality, safety, ethics etc.

Appendix reference: A4-4

5. To what extent is it feasible for producers to change their level of production in response to changing market conditions such as increases in prices?

If costs increase for a quality brand such as Frog Bikes there is very little we can do to reduce our overheads to avoid price increases to the consumer. We have developed every component based on extensive research of the needs of kids. Our lead times are as long as 200 days, so a change in input costs cannot be mitigated easily. For example the April increase in Living Wage and National Insurance

Employer costs will mean an extra cost on the production of bikes. The choices open to us are reduce overheads, by losing employees or changing site or increasing the selling price of the bikes, which will have a negative impact on volume.

Appendix reference: A4-5

6. Provide a general description of the trends and drivers of demand within the UK market for bicycles, including causes of demand fluctuations and any factors contributing to overall market growth or decline.

The BA market data shows the trends overtime, volumes have dropped. This is believed to be due to so many more bikes selling during covid and a rise in second hand bike sales. Prices have been reduced in the last year, however, volume has not increased as the barrier to cycling is not price, it is safety on the road and infrastructure. In areas where there are Active Travel campaigns and spend there have been increases in cycling take up.

Appendix reference: A4-3

7. What are the major distribution and marketing channels within the UK market for bicycles?

Sales are split between
 Independent Bike Dealers (IBDs) believed to be about 2,000 in the UK
 Major chain shops like Halfords and Evans
 Mass market retailers and supermarkets
 Consumers shop online from the IBDs and big chains as well as Brands direct
 There are also sales on market places like eBay, Facebook, Decathlon Market place and Amazon

Appendix reference:

8. Do the goods subject to review (from the PRC) and like goods from the UK compete directly with one another?

All compete

Appendix reference:

9. Provide a general description of any government regulations or tax incentives affecting the production or sale of the goods subject to review within the PRC.

As we understand the PRC support businesses in this area exporting so much so there has been evidence to show that like bikes are cheaper outside of the PRC than in the PRC

Appendix reference:

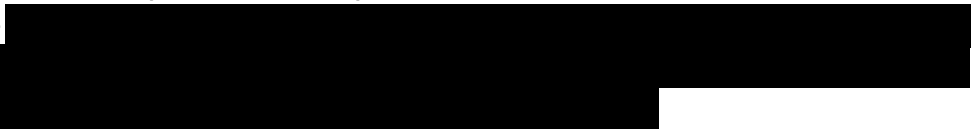
10. Provide a general description of any government regulations or tax incentives affecting the production or sale of bicycles in the UK.

Currently there are no incentives to produce in the UK

Appendix reference:

11. Provide a general description of developments in technology affecting the characteristics, demand or the production process of bicycles.

The current big development that Frog Bikes are working on include the following:

1. Greener Aluminium. Aluminium creates 17kg of CO₂e per 1kg of Primer Aluminium. As there is an increase in the percentage of Post-Consumer Recycled (PCR) Aluminium the amount of CO₂e drops. Frog Bikes has recently launched 25% PCR on frames and forks and have sme 30% coming soon. Frog Bikes also has moved cranks to 75% PCR. The emissions at this level are thought to be about 4kg of CO₂e. This is market leading. Brompton and Hydro have been testing 100% PCR Aluminium rims. Frog are planning to rollout to 75% PCR on more components
2. Plastic alternatives- Frog Bikes have removed all signle use plastic and are moving away from primary plastic to recycled plastic or alternative Bio Plastics, for example Rice Husk pedals
3. Tyres – 

Appendix reference: A4-11

12. Provide a comment on any other factors which influence the market for bicycles.

Frog Bikes are in a strong position only making kids bikes. These riders are constantly growing and general stay with the brand.

Generally, the market for bicycles are impacted by the following:

Cost of living

Local government spend on active travel

Bikeability trainers in the area

Schools support for active travel and Bikeability

Appendix reference:

A5 Board members and principal shareholders

1. Please complete the table below for any shareholder with >5% holding in the company who also has interest in any organisation related to the production, marketing, administration, and sale of the like good in the UK or the PRC.

Name	Shareholding in company	Name of Other Companies in which person holds interest	Activity of other companies
██████████	██	█	█
██████████	██	█	-

+Add additional rows as required.

2. Please complete the table below for any members of the Board of Directors who also has interest in any organisation related to the production, marketing, administration and sale of the like good in the UK or the PRC.

Name	Position on Board of Directors	Name of Other Companies in which person holds interest	Activity of other companies
██████████	██████████	██████████	██████████

+Add additional rows as required.

A5 Operational links with other companies or persons

1. Please complete the table below if your company has established long term agreements or relationships with any company/companies located in the UK, the PRC or in third countries for the production (e.g., sub-contracting), supply and sale of the goods subject to review or the like goods, or other licensing, technical patent or compensatory agreements. Please provide the relevant contract for each agreement listed.

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix Number of contract
Fibrax – Wrexham	Manufacturer of Cables	117971 -UK	No Contract, long term partnership
Herrmans – Finland	Manufacture of Reflectors	Finland	No Contract, long term partnership
Thun	Manufacturer of Bottom Brackets	Germany	No Contract, long term partnership
██████	██████	Sweden	Agreement included
██████	Saddles	Taiwan	No Contract, long term partnership
██████	Rice Husk Pedals	Taiwan	No Contract, long term partnership
Microshift	Shifters and Levers	Taiwan	No Contract, long term partnership
Sunrace	Cassettes	Taiwan	No Contract, long term partnership
Tektro	Brakes and Levers	Taiwan	No Contract, long term partnership
Wellgo	Pedals	Taiwan	No Contract, long term partnership
██████	Forks	██████	No Contract, long term partnership
██████	Spokes	██████	No Contract, long term partnership
██████	Cranks	██████	No Contract, long term partnership
Kenda	Tyres	Taiwan	No Contract, long term partnership

KT	Hubs	Taiwan	No Contract, long term partnership
██████	Rims	██████	No Contract, long term partnership
██████	Mudguards	██████	No Contract, long term partnership
██████	Handlebars, Stems, Seatposts	██████	No Contract, long term partnership
██████	Frames	██████	No Contract, long term partnership
██████	Grips	██████	No Contract, long term partnership
			Appendix A5-1

+Add additional rows as required

A6 Accounting practices

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

Records address	What records are held?
n/a	

+Add additional rows as required

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

1 March – 28 February

Appendix reference:

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

Please note the statutory accounts for February 2024 have not been submitted to companies' house. Unsigned draft accounts provided as at the date of submission.

Appendix reference:
A6-3 Statutory accounts zip

4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the injury period 1 July 2020 – 30 June 2024.

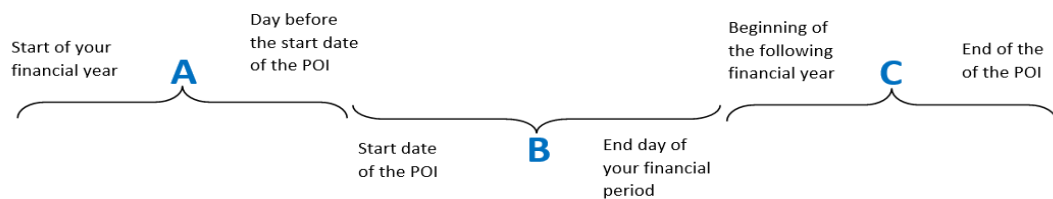
n/a

Appendix reference: n/a

5. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI 1 July 2023 – 30 June 2024. If your financial year is fully aligned with the POI, this is all that is required.

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

- A.** the trial balance which starts from the beginning of your financial year and ends on 30 June 2023;
- B.** the trial balance which starts from 1 July 2023 to the end of your financial year; and
- C.** the trial balance which starts from the beginning of your following financial year and ends on 30 June 2024.



Transactional TB unavailable. TB provided at the following dates (EOM)
Feb 2023
June 2023
Feb 2024
June 2024

Appendix reference:
A6-5 Trial Balance zip

6. For your company and any associated parties involved in the production, marketing or sales of the like goods or the goods subject to review (PRC produced), please

attach copies of relevant management reports (e.g., profit and loss statement) for the profit centre that includes the like goods. Please provide these reports for the (i) POI and (ii) most recently completed financial year.

If we understand this question this is for any PRC subsidiary – Frog Bikes don't have this

Appendix reference:

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

Draft accounts for Feb 2024 provided – audit report remains unsigned, not yet submitted at Companies House

Appendix reference:

A6-3 Statutory accounts zip

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

NetSuite Financial Accounting System: Overview and Integration

NetSuite is a comprehensive, cloud-based Enterprise Resource Planning (ERP) system that includes integrated financial accounting, management accounting, and operational modules. The system is designed to manage all financial aspects of a business, from transactional data to reporting, offering a unified view of financial data. One of its key features is how it integrates sub-ledgers (costing, debtors, creditors, etc.) with the general ledger (GL) and how it links to the management accounting system.

1. General Ledger and Sub-Ledgers Integration

*The **General Ledger (GL)** serves as the core of the financial accounting system, where all financial transactions are eventually posted. NetSuite seamlessly integrates various sub-ledgers into the GL, allowing for automatic updates and streamlined financial reporting.*

Key Sub-Ledgers in NetSuite:

1. Accounts Receivable (Debtors) Sub-Ledger:

- ***Sales Transactions:** When sales are made, the **accounts receivable sub-ledger** records the outstanding amounts owed by customers. These are linked to the general ledger through journal entries. For instance, when an invoice is created, it is reflected as a debit entry in*

accounts receivable (asset account) and a credit entry in revenue (income account).

- **Collections and Payments:** As payments are received, they reduce the outstanding receivables and are posted to cash accounts and accounts receivable.
- **Aging Reports:** NetSuite provides an aging report that tracks overdue invoices and their respective statuses, which is critical for cash flow management.

2. Accounts Payable (Creditors) Sub-Ledger:

- **Purchases and Expenses:** When goods or services are purchased, **accounts payable** records the amounts owed to suppliers. These transactions are linked to the GL, with a debit entry to an expense or asset account (depending on the purchase) and a credit entry to accounts payable.
- **Payments:** When payments are made to creditors, the cash account is credited, and accounts payable is debited, reducing the liability.
- **Vendor Aging:** Similar to the accounts receivable module, NetSuite tracks overdue payables, helping to manage supplier relationships and cash flow.

3. Costing Sub-Ledger:

- **Inventory Costing:** NetSuite allows for detailed tracking of inventory items. The costing sub-ledger calculates the cost of goods sold (COGS) based on average costing. When inventory is sold, the system automatically updates the GL with the appropriate COGS and inventory adjustments.

Integration Process:

- **Automatic Posting to the General Ledger:** As each sub-ledger transaction occurs, NetSuite automatically creates journal entries that flow into the GL, ensuring that financial data remains accurate and up-to-date without manual intervention.
- **Double-Entry Accounting:** NetSuite maintains a double-entry accounting system, where every transaction involves both a debit and a credit. For example, when a sale is made (accounts receivable), the revenue account is credited, and the accounts receivable account is debited.
- **Real-Time Updates:** As sub-ledger transactions occur, they are reflected in real time in the general ledger, ensuring that financial statements are always current.

2. Integration with Other Sales and Production Systems

NetSuite offers integration with various sales, procurement, and production systems, enabling seamless data flow between operations and financial accounting.

- **Sales Integration:** The **Sales Order** module integrates with accounts receivable and the GL. When a sale is placed, NetSuite automatically generates an invoice and records the transaction in the accounts receivable

sub-ledger. The associated revenue and cost of goods sold are updated in the GL.

- **Production Integration:** For companies that manufacture goods, NetSuite can integrate with the **Manufacturing** module. This module tracks production costs, inventory usage, and work-in-progress (WIP) items. The system can automatically calculate labour, material, and overhead costs, which are posted to the GL through the costing sub-ledger.
- **Procurement Integration:** The **Purchase Order** module integrates with the accounts payable sub-ledger. When a purchase order is received, the system updates inventory and accounts payable records.

3. Linking to Management Accounting

NetSuite facilitates management accounting through its **management reporting tools**, providing the ability to analyse data from various sources, such as operational and financial systems. The integration between the general ledger and management accounting tools ensures that managers have access to up-to-date, accurate data for decision-making.

Manual Interventions:

While NetSuite's automation reduces the need for manual interventions, there are still certain situations where human involvement is required:

- **Manual Journal Entries:** If a transaction does not fit into the automated process (e.g., unusual accounting adjustments), finance teams may need to create manual journal entries.
- **Accruals and Prepayments:** For certain accrual accounting adjustments (e.g., accrual of expenses or recognition of revenue), manual intervention may be necessary to ensure proper reporting.
- **Period-End Adjustments:** At the end of a financial period, finance teams often review and adjust financial statements, making sure all transactions have been recorded accurately and that accounts are reconciled.

4. Reporting and Dashboards

- NetSuite provides **real-time financial reporting** tools, such as balance sheets, profit and loss statements, and cash flow reports. These reports pull data directly from the GL and integrated modules.
- **Management Dashboards** offer key performance indicators (KPIs) and metrics that can help with quick decision-making, providing an overview of both financial and operational performance.

Conclusion

NetSuite integrates its financial accounting system with various sub-ledgers, including accounts receivable (debtors), accounts payable (creditors), and costing, seamlessly posting transactions into the general ledger. This integration allows for real-time updates, reducing manual data entry and ensuring accurate financial reporting. Furthermore, NetSuite links its general ledger with the management accounting system, offering tools for budgeting, forecasting, profitability analysis, and cost allocation, enabling better decision-making. While most processes are

automated, there are areas where manual interventions, such as journal entries and period-end adjustments, may be necessary to ensure accurate financial reporting.

Appendix reference:
A6-8a Chart of Accounts
A6-8b Company's Cost Centre

9. Have you changed your financial policies during the injury period? If so, please explain the changes, including dates and the reasons for those changes along with the financial impact of those changes against the like goods.

No change in accounting policies during the injury period

Appendix reference: n/a

SECTION B: About your goods

B1 Understanding your like goods (Category 1 – Bicycles)

The goods subject to review in this review are defined in [‘the scope of this review’](#). For the purposes of this section, the focus is on category 1 goods – bicycles.

1. Please complete **Annex 2 – Product comparison**, If your company manufactures a range of bicycles, list this information for each individual make and model in the range.
2. If there are differences in characteristics within your range of bicycles 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.

Balance Bike	No pedals for small kids	Teaches balance
First Pedal	No gears	First chances to pedal
Hybrid	Gears and tyres good for on and off road	Everyday bike
Road Bike	Specialist for road cycling	Drop handlebars, come with on and off road tyres
Mountain Bike	Off road specialist bike	Chunky tyres, front suspension, more specialist bike

City Bike	Commuting	Used in Europe for journeys to school
Track Bike	Very specialist, not on road. No gears and no brakes	Fixed wheel so having to pedal slower to slow down. No free wheel, no brake
Appendix reference: A4-2		

3. Indicate in the box below any physical, commercial or functional differences between your products and the goods subject to review (from the PRC). If these differences cause distinguishable variations in price, explain those differences and the effect they have. Attach any evidence you have that is relevant.

*Frog Bikes has commissioned independent research at Brunel University in 2012-2015 to understand key differences between kids cycling and adults cycling. Then redesigned the bikes and parts to be ideal for kids. No-one else has this data of thought about kids cycling in this way.
The work Frog Bikes is doing in sustainability is ahead of all other businesses globally*

Appendix reference: B1-2, A4-11

4. Please provide details of your like goods (bicycles) regarding their production processes, interchangeability, raw materials used, degree of model differentiation channels of distribution and sale, pricing and other relevant characteristics.

See section A3 Qu 2

Appendix reference: A4-2

SECTION C: Costs and Production

C1 Cost to make and sell

1. Please Complete **Annex 3 – Cost to make and sell** for your total goods and for the total like goods (category 1) produced in the POI (1 July 2023 – 30 June 2024).
2. If your company is vertically integrated or some of the inputs (e.g., raw materials, energy) used in the production of your like goods are produced by an associated party, provide details of this arrangement, and attach documentation demonstrating any agreements you have.

n/a

Appendix reference: n/a

3. Please state the cost allocation method for each cost type listed in **Annex 3 – Cost to make and sell**.

Direct Cost allocation

Appendix reference:

C2 Cost reconciliation (Bicycles)

1. Please complete **Annex 4 – Cost reconciliation**: please only fill in the white cells and include reference to the source documents of the inserted data.

C3 Production process

1. Please provide a written summary and a diagram/flow of your production process clearly indicating the different production stages for your bicycles carried out by your company.

See Frog Factory Video - <https://www.youtube.com/watch?v=mMhJ4oRk2tY>
Wheels – Hubs and Spokes are merged in our automated Hub Filler at about 1 hub in every 24 seconds

These filled hubs are then moved to a lacing machine with a Wheel Lacer who use the machine to place spokes into the rim

The wheels then are taped and trued by a robot

Finished wheels have a cassette added as well as Inner Tube and Tyre placed on and inflated.

The rear wheels are placed in a rack.

The front wheels have mudguards added, then placed in paper bags (packaging for protection) and then placed in the rack.

Frames and Forks have headsets pressed on to them at different stations.

Forks then have front brakes added and tested with the correct wheel

Frames then Bottom brackets added as well as crank-sets.

These frames then have rear brakes added as well as multiple bolts.

Frame and Forks are moved to the station where they are joined with stems and spacers.

Next chains are put on the frame crank set and moved to the production line.

These almost bikes, are sent down the line where rear wheels are added. Handlebars are placed on the line with all cables for brakes and gears. Gears are tested with the cranks spinning the rear wheel.

Other areas of the factory we

- a) put the saddles and seat posts together and add the rear reflector
- b) put the brake levers, handlebars and grips together then add the cables
- c) we place all the accessory items in a little box, reflectors, road grips, bell, clear protective stickers, paint plasters etc

These are then moved to the production line.

As the production line move the above three aspects join rest of the bike and the handlebars are placed on the bike.

At the end of the line, Front Wheels and the almost built bike are placed in a box with the seat post placed in the frame.

The box is sealed closed with staples and paper tape.

The bike is then moved to our lifting system to be put away in the upstairs warehouse.

Appendix reference:

2. Identify what parts of your production process take place in the UK and explain at what stage the most value is added to your like goods in the production process. Please describe the manufacturing process of the like goods, its level of complexity and the investment of capital involved. If a production process is carried out outside the UK, please explain the nature of the activity and where this process step takes place.

See Frog Factory Video - <https://www.youtube.com/watch?v=mMhJ4oRk2tY>
Wheels – Hubs and Spokes are merged in our automated Hub Filler at about 1 hub in every 24 seconds

These filled hubs are then moved to a lacing machine with a Wheel Lacer who use the machine to place spokes into the rim

The wheels then are taped and trued by a robot

Finished wheels have a cassette added as well as Inner Tube and Tyre placed on and inflated.

The rear wheels are placed in a rack.

The front wheels have mudguards added, then placed in paper bags (packaging for protection) and then placed in the rack.

Frames and Forks have headsets pressed on to them at different stations.

Forks then have front brakes added and tested with the correct wheel

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Handlebars are placed on the line with all cables for brakes and gears.

Gears are tested with the cranks spinning the rear wheel.

Other areas of the factory we

a) put the saddles and seat posts together and add the rear reflector

b) put the brake levers, handlebars and grips together then add the cables

c) we place all the accessory items in a little box, reflectors, road grips, bell, clear protective stickers, paint plasters etc

These are then moved to the production line.

As the production line move the above three aspects join rest of the bike and the handle bars are placed on the bike.

At the end of the line, Front Wheels and the almost built bike are placed in a box with the seat post placed in the frame.

The box is sealed closed with staples and paper tape.

The bike is then moved to our lifting system to be put away in the upstairs warehouse

Appendix reference:

3. Please provide the physical addresses (including town/city and county) of all your company's UK sites/facilities involved in the production of the like goods.

Company name	Physical address
Frog Bikes Ltd	Silwood Business Centre, Buckhurst Rd, Ascot SL5 7PW
Frog Bikes Ltd	Mamhilad Park Estate, Southway, Pontypool NP4 0HZ

Appendix reference:

+Add additional rows as required

C5 Raw material (RM) and major input purchases

1. Please complete **Annex 5 – Raw materials and input purchases**, detailing by supplier, purchases, which account for more than 5% of total cost to make and sell (or if energy more than 1%), used in the production of the **category 1 (bicycles) like goods** during the POI by your company

2. Please provide an invoice and any supporting documents for two typical suppliers stated within **Annex 5 – Raw materials and inputs**. Use the box below to give an overview of any supporting documents provided.

[Redacted]	
[Redacted]	[Redacted]
[Redacted]	[Redacted]

C6 Purchases of like goods and/or goods subject to review

1. Complete **Annex 6 – Purchases of like goods** and/or goods subject to review for **category 1 goods (bicycles)**. This should include information relating to your company's total annual purchases of the like goods and/or goods subject to review over the injury period. All figures should be reported net of recoverable tax. Please list for each year every country you have purchased from in a separate row.
2. Describe how these purchases fit into your business model. Please attach copies of any agreements or contracts that you have relating to your purchases of like goods and/or goods subject to review for **category 1 goods (bicycles)**.

n/a – Frog Bikes does not purchase like goods.

Appendix reference:

SECTION D: Sales

D1 – Domestic sales

1. Please complete **Annex 7 – Transaction by transaction (T by T) domestic sales (bicycles)**
 - These should include all your domestic sales net of returns for bicycles for the POI. Include the bicycles you have produced, purchased and resold and/or **category 1 goods subject to review (bicycles)** that you have purchased and resold.
 - Please report returns as negative (-) sales figures.
 - Please ensure that you correctly categorise each sale by commodity code.
 - For transactions or invoices that consist of multiple commodity codes, the same invoice number should be referenced.

Please contact the Case Team if you can't provide the relevant information in sufficient detail.

D3 Sales reconciliation

1. Please complete the sales reconciliation table in **Annex 8 – Sales reconciliation**
2. Additionally, please complete the sales forecast table in **Annex 8 – Sales reconciliation** providing quantitative estimates (e.g., projections or forecasts) for the sales revenue and quantity of like goods (**category 1 – bicycles**) and of all other goods you produce on the UK market for the next five years.

D4 Distribution channels and price setting

1. If applicable, please provide copies of price lists for the like goods (category 1 – Bicycles) for 1 July 2023 – 30 June 2024.

Price per country as at the end of the POI provided. The templates provide RRPs for the respective country. Depending on the customer a different “store margin” should be included to get the customers price. These can range from 28% [REDACTED]

Appendix reference:
D4-1 May 2024 Prices – Single Euro Price

2. If any price reductions have been applied to any of your sales of like goods (category 1 – bicycles) over the POI, please provide a description. This includes discounts, rebates, credit terms, allowances and commissions.
 - Explain the terms and conditions that must be met for any price reduction.
 - Indicate any price reduction not included in an invoice price. Explain how the invoice price and the price reduction have been calculated.
3. Please provide details of your distribution network for like goods if you have one.

Appendix reference:A4-1

4. Do your sales usually include delivery in the price? If so, please explain how you calculate delivery costs and prices?

For retail customers delivery is free if 3 or more bikes have been ordered at a time. During the POI consumers have free delivery. Partnership sales will depend on the contract agreed. Delivery costs are calculated depending on the expected delivery method and, if applicable, the size of the bike. Prices are based on what we consider to be reasonable to pass on to customers.

Appendix reference:

5. Does delivery price vary between customers? If this is the case then please explain what these differences may relate to.

Price will depend on the customer type i.e. Retail/Consumer/Partnership, the location of the customer and the size of the order i.e. a larger order will be cheaper.

As mentioned earlier

Trade customers are given free delivery on 3 bikes or more

Consumers are generally free

Some Overseas trade customers trade on EX-WORKS basis

[Redacted]
Appendix reference:

- 6. If you provide bulk sales to any customers, please attach sales contracts for a maximum top five customers by volume in **Annex 7 – Transaction by transaction (T by T) domestic sales** that you have sold like goods (category 1 – Bicycles) to in the period of investigation

We do not have contracts in place for customer, however, they sign up to our standard Terms & Conditions. Distributors have an annual commitment.

Appendix reference:D4-6

- 7. Select examples of domestic sales of like goods to two different customers included in **Annex 7 – Transaction by transaction (T by T) domestic sales**. Attach as an appendix a complete set of documentation for these sales. Where possible, include purchase orders, commercial invoices, order acceptances, discounts or rebates, credit and debit notes, contracts of sale, freight and insurance details, bank documentation and all other relevant documents.

[Redacted]

Appendix reference:
[Redacted]

SECTION E: Injury to your company

When we investigate imports of goods which may be dumped, we will need to establish whether UK industries producing similar goods are being injured by the imports.

We determine injury to UK producers on a case-by-case basis, based on positive evidence. We will not decide based on any single factor.

To determine whether a UK industry is suffering or has suffered material injury from imports of the goods subject to review, we will examine:

- *the volume of the dumped goods during the injury period*
- *the effect of the imports on prices in the UK market for like goods during the injury period*
- *the consequent impact of the dumped goods on UK industry during the injury period*
- *any other factors we consider relevant*

1. Would your company suffer from injury if the existing anti-dumping measure on the goods subject to review no longer applied? If so, please describe the nature and degree of the injury. If your company is already suffering injury, would the nature or source of the injury change if the measures were to no longer apply?

Frog Bikes investigation has shown having the equivalent Frog 53 (20" wheeled) bike manufactured in China would cost █████, whilst in the UK █████ So with Anti-Dumping Duties the China one would be upwards of █████. Dropping the cost price to █████ would mean a drop in RRP from £████ to £████ Thus Frog Bikes would be █████ more expensive and would not be able to compete as the Gross profit on a bike would drop from █████, not enough to manage and run the business. The only choice for Frog Bikes would be to close the factory and make the team redundant and buy from China. Frog Bikes would suffer from injury as the loss of jobs and redundancy would not be financially possible for the business.

Appendix reference: E-1

2. How would your costs to make and sell change if the existing anti-dumping measure on the goods subject to review no longer applied, what measures would your company have to take to remain competitive. If possible, please provide annual estimates (e.g., projections or forecasts) for the next five years for any changes and use the text box below to explain the methods used to calculate these estimates.

Frog Bikes investigation has shown having the equivalent Frog 53 (20" wheeled) bike manufactured in China would cost £████ whilst in the UK £████ So with Anti-Dumping Duties the China one would be upwards of £████ Dropping the cost price to £████ would mean a drop in RRP from £████ to £████ Thus Frog Bikes would be █████ more expensive and would not be able to compete as the Gross profit on a bike would drop from £████ to £████ not enough to manage and run the business. The only

choice for Frog Bikes would be to close the UK factory and make the team redundant and buy from China

Appendix reference:

3. Please complete **Annex 9 – Injury**. This should be completed in reference to your UK production of the like goods (category 1 – bicycles) for the injury period.
4. Please explain how you calculated and apportioned your average net operating profit after tax (NOPAT) for the like goods (category 1 – bicycles).

The apportionment of the P&L for like goods is straightforward, as Frog Bikes is entirely devoted to the efforts of production, distribution, and retail of the like goods. This means that there are few adjustments which need to be made, as the only ‘other’ activities relate to significantly fewer material activities such as the purchase and sale of accessories and some limited other service income. Whilst it might be more difficult to specifically allocate overhead items between the activities, it is reasonable that profitability would be in line and therefore a total percentage of the overall net profit was done based on % of revenues.

Appendix reference:

5. Please explain how you assess your stock levels. Please indicate if your stock levels were abnormally high during the injury period. If so, please explain.

Bike stock levels are reviewed on a regular basis. Depending on expected changes in Sales required production will be amended to take in account increase/decreases in these numbers and across the different bike types – the aim is to maintain finished bike stock to service 2 months’ worth of Sales.

Componentry stock is purchased based on the production plan however as some supplier lead times are > 6 months componentry stock levels cannot easily be corrected for any changes. We ideally want componentry stock to service 45 days of production.

During the POI our stock levels has changes significantly. As at June 2021 we had seen significant demand due to Covid however were unable to get componentry from the Far East to replenish the stock due to freight issue. By June 22 all the backlog of componentry will have been received and the expectations in the market due to pent up demand from covid meant that we produced a significant number of bikes. Finished bike stock peaked in August 22. As the demand did not come to fruition it was decided to reduce headcount and reduce production to improve cashflow.

Appendix reference:

6. Please explain how you estimated your percentage of market share for the like goods (category 1 - bicycles) during the POI.

We have simply looked at the estimated volume in the market and our sales and done the maths. The Conebi and USA data are the best estimates

Appendix reference: E-6

7. Please explain how you calculated your production capacity and capacity utilisation for the like goods (category 1 – bicycles), and the cause of any significant variations

Production capacity is based on expected daily Bike production taking into account factory/warehouse staff levels. During the POI we reduced headcount therefore capacity was reduced.

Appendix reference: E-7 slide 9

8. Explain any variances between your actual and forecasted budgets over the injury period, with reference to your cash flow statements. Would your forecasted budgets be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Wages are set via reference to the living wage standards and are subject to an annual cost of living inflationary adjustment. This resulted in a variation in the current period for example due to elevated levels of inflation. Manufacturing roles are split into several bands based on the level of training and skills required. Frog Bikes strongly encourages and promotes the upskilling and diversification of skills of its employees through such incentives.

Appendix reference:

9. Please explain how you set your wages, and the causes of any significant variations.

Wages are set based on median market expectations for the Roles & Responsibilities and qualification required for the job role, level of experience is also taken into account. Current wage levels will be periodically reviewed by an external HR consultant.

Annual inflationary increases are given to employees employed > 6months at the time of the increase (April for Factory/Warehouse Operatives – in line with changes to the National Minimum Wage, and July for all other staff).

Employee performance also impacts increases with over-achieving staff getting a higher than average increase, conversely those not performing will not be awarded as much.

Appendix reference:

10. Please explain whether any of the indicators listed in **Annex 9 – Injury** would be affected if the existing anti-dumping measure on the goods subject to review no longer applied. Please substantiate your claims with evidence. Where possible, please add additional rows in **Annex – 9 Injury** to provide estimates for the next five years (e.g., projections of forecasts). Please use the text box below to explain the methods used to calculate your estimates.

If the Anti-dumping was removed, we would close our factory as we could not justify the variations in costs

Appendix reference:

11. For your like goods only (category 1 – bicycles), please state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve in the absence of injury and explain how you arrived at this figure. Would your level of profit, before tax, as a percentage of turnover for the like goods be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

If the Anti-dumping was removed, we would close our factory as we could not justify the variations in costs and would be running at a loss

Appendix reference:

12. Explain how you set your current sales price for your like goods (category 1 – bicycles). Is this the same as your target sales price? If not, please explain the reasons for this. Would your sales price for your like goods be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Selling price starts at the cost price of the goods including overheads. Then builds in margin given to retailers and profit. Then we look at market competitors to arrive at our ideal selling price

Appendix reference:

13. Complete **Annex 10 – Investments and Return on Investment**.

- For each investment category, indicate the amount of investment (apportioned, where applicable) and explain what the investment is for.

- Where possible, add columns in **Annex – 10 Investments and Return on Investments** to provide estimates (e.g., projections or forecasts) for future years assuming the measure is retained.
- For the investments you have made during the injury period, please also provide the depreciation incurred company-wide and for the like goods (category 1 - bicycles).

Appendix reference:

14. Please provide details of your typical source(s) of finance (e.g., loans, debt, share issues, bond issues etc.) for each category of investment relating to your company-wide investments.

Shareholders input and banking Trade Finance
Appendix reference:

15. Please describe any changes in your company's level and trends of returns on investment over the injury period. Please explain the nature and cause of this change and substantiate with supporting evidence e.g., funding proposals, loan approvals or other relevant financial documents.

16. Please explain whether your company's ability to make investments and/or ability to raise capital would be affected in the next five years if the existing anti-dumping measure on the goods subject to review no longer applied. Please substantiate your claims with evidence (e.g., company investment plans, etc) and if you have provided estimates explain how you calculated them.

If the ADD was removed there would be no more funds available for the current infrastructure
Appendix reference: E-7 is a pitch deck

17. Please complete **Annex 11 – Forward sales contracts**. Describe and attach copies of all forward sales contracts/ongoing supply agreements for like goods (category 1 – bicycles). Comment on these forward sales contracts – are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward contracts over time? If so, what has caused this variation? Would your forward sales contracts be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

We do not put in Forward contracts with our trade customers. We have distribution agreements with volume expectations

Appendix reference: D4-6

18. If your company is suffering from injury, please explain and indicate the degree to which this has been caused by the alleged dumping of the goods subject to review. Please also explain and indicate the degree to which any other factors might have caused the injury, 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.

Please substantiate your claim(s) with evidence.

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

Appendix reference:

19. Would there be any other effects on your industry and/or company if the existing anti-dumping measure on the goods subject to review no longer applied? Please substantiate your claims with evidence.

Frog Bikes manufacturing in the UK would no longer be viable and would close the UK site and move production offshore laying off most of the team in Wales
Appendix reference:

SECTION F: Dumping

Please note: *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.*

F1 Dumping

1. Do you have any information about the normal value (price sold in the domestic market) of the goods subject to review in the PRC? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes, market intelligence or sales correspondence, or any other documentation relating to the domestic price of the goods subject to review in the PRC.

n/a

Appendix reference:

2. Do you have any information about the export price to the UK of the goods subject to review from the PRC? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes or sales correspondence, or any other relevant documentation relating to the export price to the UK of the goods subject to review from the PRC.

Quote included for a 20" model

Appendix reference:E-1

F2 Likelihood of dumping

1. Do you have any information about the capacity and capacity utilisation among exporters of the goods subject to review during the POI? Please provide estimates and substantiate with evidence where possible.

Appendix reference:

2. Do you know how capacity and capacity utilisation among exporters of the goods subject to review have changed during the POI, or might change in the next 5 years? Please provide evidence if available.

n/a

Appendix reference:

3. Please provide any additional information that might inform our assessment of whether imports of the goods subject to review are likely to be dumped if the measure is removed. This could include:
- exports of like goods to third countries by exporters of the goods subject to review,
 - conditions for the exporters of the goods subject to review in their domestic market,
 - information on raw material markets and prices, including any restrictions concerning raw materials used for the production of the goods subject to review,
 - attractiveness of the UK market for bicycles compared to the market in third countries, and
 - any other relevant factor.

Please provide supporting evidence where possible.

n/a

Appendix reference:

F3 Particular market situation

1. Are you aware of any guidance, policies or additional factors within the PRC that encourage the production of bicycles that could mean costs or profits of the goods subject to review are not substantially determined by market forces, please provide details and any supporting evidence.

n/a

Appendix reference:

2. Are you aware of any guidance or policies within the PRC that encourage the export of bicycles. Please provide details and any supporting evidence.

n/a

Appendix reference:

SECTION G: Economic Interest Test

The Economic Interest Test helps the TRA assess the economic impact of a measure compared to what would happen if it the measure was not in place. There are six factors which the TRA must consider as part of the Economic Interest Test:

- i) The injury caused by the importation of the dumped goods to UK industry and the benefits to that industry in removing the injury.*
- ii) The economic significance of affected industries and consumers in the UK.*
- iii) The likely impact on affected industries and consumers in the UK.*
- iv) The likely impact on particular geographic areas, or particular groups, in the UK.*
- v) The likely consequences for the competitive environment and for the structure of markets for goods in the UK.*
- vi) Other matters that the TRA considers relevant.*

The questions in this section will contribute to this assessment. Please provide information broken down by each of your company's UK sites/facilities, where relevant and possible.

G1 Background

1. Please provide the names and legal addresses of the domestic companies that are involved in the importation, distribution, or sale of bicycles from third countries.

Appendix reference:

2. Please provide details of the types of buyers of your bicycles if you have examples that are not private individuals.

Independent Bike Dealers across the UK - https://www.frogbikes.com/en_GB/find-a-store.html

Bike Retailers - Evans

Appendix reference:

3. Please provide an overview of your upstream supply chain for bicycles (e.g., producers of raw materials/parts) within the UK. Where possible, please describe the number, location, and size of UK producers at each stage.

Fibrax produce cables in Wales

Appendix reference:

G2 Your company

1. Please complete **Annex E1 – Economic Interest Test**, providing employment figures in full-time equivalents (FTE) for each of your company's UK sites or facilities.
2. How would these employment figures be affected if the existing anti-dumping measure was no longer to apply? Please support your claims with evidence.

We would stop producing bikes in the UK and move production off-shore

Appendix reference:

3. How would your domestic sales of bicycles be affected if the existing anti-dumping measure was no longer to apply? Please support your claims with evidence.

Looking at sales date, there would be a drop in Frog Sales as consumers will switch to a cheaper alternative believed to be as safe as Frog Bikes, however, knowing that cheaper alternatives in Austria have had two recalls in the last two years suggest this is a bad thing, the Austrian firm testing to ISO (<https://www.gov.uk/product-safety-alerts-reports-recalls/product-recall-woom-childrens-bicycles-and-balance-bikes-2308-0066>) (<https://faq.us.woombikes.com/article/337-stem-recall-notice>)

Appendix reference: G2-3

4. How significant is the production of bicycles relative to your company's entire UK production?

100% of our production

Appendix reference:

G3 Potential impacts of a measure

1. Please describe how you would expect a decrease in the import prices of bicycles to affect each of the following. Where possible, please support your claims with evidence.

- Domestic prices of bicycles in the UK;

A small drop in price as there would be a barrier to import removed. However, there will also be a drop in safety

Appendix reference:

- Total UK production of bicycles

Reduction towards zero

Appendix reference:

- Total imports of bicycles from the PRC (including bicycles consigned from Cambodia, Indonesia, Malaysia, Pakistan, the Philippines, Sri Lanka and Tunisia) and other third countries to the UK; and

Increase as they are cheaper, however, it won't increase sales volume, just switch consumers to a cheaper unsafe alternative

Appendix reference:

- Total exports of bicycles from the UK.

Reduction as other markets would be wary that the products coming from the UK have not just been created in PRC

Appendix reference:

2. Please explain any potential changes to profit margins, should there be a decrease in the import price for bicycles and what would be the knock-on effect (e.g. would you need to source cheaper suppliers, outsource etc.)

Slight increase in margin

Appendix reference:

3. Do you know of any related industries that would be affected if the existing anti-dumping measure was no longer to apply?

Please consider in particular:

- Upstream UK industries – those who produce inputs (raw materials and bicycle parts) needed for the production of bicycles

Nope as the UK production of bikes is a small proportion of their total business

Appendix reference:

- Downstream industries – those who purchase bicycles

If there are no ADD then prices would fall. Consumers would be offered the same product cheaper or inferior unsafe products

Appendix reference:

- UK industries for complimentary goods – those which would typically be bought alongside bicycles (e.g. cycling gear)

Unchanged

Appendix reference:

- UK industries for substitute goods – those which might be bought instead of bicycles (such as e-bikes or scooters).

No change – we do not see these as competitive industries

Appendix reference:

4. To what extent does the inclusion of **category 2 goods (certain bike parts)** within the measure affect:

- Your business.

Frog Bikes have an exception on many items. Removing ADD on these others will help for paperwork and administration

Appendix reference:

- Other UK businesses

Should help Customs and Excise and other potential manufacturers

Appendix reference:

5. To what extent would you expect any changes in price of bicycles to be passed onto final consumers?

This is very dependent on the manufacturers of the "like" goods, as Frog Bikes pricing is positioned differently to base on our product portfolio. One would expect a slight drop in prices to consumers due to the mass manufacturing than China has over the world.

Appendix reference:

6. Would your plans for investment or expansion in the UK over the next five years be affected if the existing anti-dumping measure was no longer to apply? Please support your claims with evidence.

Frog would stop any investment in the UK

Appendix reference:

7. As a public body, the TRA has an obligation under the Equality Act 2010 to ensure that the possible effects of its activities on different people are considered. This public sector Equality Duty covers the following protected characteristics:

- age,
- disability,
- gender reassignment,
- marriage or civil partnership,
- pregnancy and maternity,
- race,
- religion or belief,
- sex, and
- sexual orientation.

Please provide any relevant information about whether any of these groups or any other particular group might be disproportionately affected if the existing anti-dumping measure was to no longer apply.

n/a

Appendix reference:

8. How would the number or range of suppliers in the bicycles UK market be affected if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

There would be a drop in the number of brands as cheap unsafe products would be released onto the market with fake test certificates allow consumers to be hoodwinked in believing there were safer cheaper products on the market.

Appendix reference:

9. How would consumers' ability to differentiate bicycles by price, quality, service or innovation be affected if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

There would be more copy-cats making it harder for consumers to identify the safe bikes versus the fake unsafe versions

Appendix reference:

10. How would the cost of switching between suppliers in the bicycles market be affected if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

No barrier to switch. Frog Bikes has always positioned itself as a differentiator, offering a better designed product, manufactured with more advance materials and techniques, safer, reliable and very kid focused. This allows Frog to operate at an appropriate price point, for a highly engineered product which will last years. And as such pricing policies between suppliers or certain consumers would be a business specific task, and we will not speculate on this matter.

Appendix reference:

11. How would the suppliers' ability to set agreed prices between themselves or for certain consumers or products be affected if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

Frog Bikes has a defined supplier base, for quality components as reflected in our business summary and where we position ourselves in the marketplace. This would be hard to quantify. The key thing would be opening up the market for Unsafe products.

Appendix reference:

12. How would the choices of bicycles available to consumers be affected if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

More unsafe products in the UK.

If the trade barrier was removed then obviously consumers would be able to have greater choice of “like” goods, and different price points. It is to be seen if the impact of quality and durability would drive consumers to more reliable brands in the future, but the market would have more options to the consumer. But with recent reports on e-bike fires, would extending the market options create greater risks for the general public.

Appendix reference:

13. How would the ability of downstream businesses or consumers to make informed decisions be affected if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

Harder as there would be more thus the consumer would find it harder to differentiate Consumers will always have decisions to make, it is up to companies to furnish them with the information to make an informed choice, just as they currently do in the marketplace where these trade barriers exist

Appendix reference:

14. Are there any additional economic factors that you consider to be relevant for the Economic Interest Test in this investigation?

Safety

Through this review process it should be noted and understood the findings from the European Bicycle Manufacturers Association (EBMA) on the EU Antidumping and Anti-subsidy Expiry Review Requests for Ebikes which have been now formally filed with the European Commission-DG Trade on 13th October 2023. These reports took into account the impact on 1200 sustainable manufacturing SMEs and 180,000 Green Jobs of the EU Bicycles, Ebikes and Components Industry, and parallelly also these investigations are extremely important to the UK Bicycles, Ebikes and Components Industry. If the European Commission will decide to adopt these EBMA's Expiry Review Requests for Ebikes, the European Commission's investigations (lasting 15 months) will start in January 2024 and end in May 2025.

Appendix reference:

SECTION H: 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 – About your goods	✓
Section C – Costs and production	✓
Section D - Sales	✓
Section E – Injury to your company	✓
Section F – Dumping	✓
Section G – Economic Interest	✓

+Add additional rows as required

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	Document title
All labelled as to the relevant question	

+Add additional rows as required