



Anti-Dumping Questionnaire (Exporter)

Case AD0047: Certain Excavators exported from the People's Republic of China

Period of Investigation (POI):	<input type="text" value="1 July 2022 – 30 June 2023"/>
Injury period:	<input type="text" value="1 July 2019 – 30 June 2023"/>
Deadline for response:	<input type="text" value="14 March 2024"/>
Contact details:	<input type="text" value="AD0047@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="Shanghai SANY Heavy Machinery Co., Ltd."/>

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 **28 February 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.

This case is investigating the allegation that Certain Excavators exported from the People's Republic of China (PRC) are being dumped (exported to the United Kingdom (UK) at prices less than their normal value) and that this dumping is causing injury to the UK industry for these goods.

Why should I take part?

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

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

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

How do I respond?

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

Please provide all the information requested by **28 February 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 AD0047@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, AD0047, in any correspondence with the TRA.

Preparing confidential and non-confidential copies

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



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

In preparing your response, please note the following:

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

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

Providing information from subsidiaries or associated parties

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

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

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



complete Annex I, as well as sections of the questionnaire they are reasonably able to answer.

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

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

What happens next

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

- you will receive an email confirming the documents have been uploaded successfully.
- the Case Team will contact you if further information is required;
- the non-confidential responses will be placed on the public file; and
- the Case Team may contact you to arrange a visit to verify the information contained in your responses.

Verifying the information you supply

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

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

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

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

RESPONSE

Shanghai SANY Heavy Machinery Co., Ltd. (hereinafter referred to as “SANY Shanghai” or “our company”) is available for verification, but it would very much



appreciate if the Trade Remedies Authority (“TRA”) could kindly confirm the dates of verification with its legal representatives in advance.

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.



The scope of this investigation

Goods concerned

This investigation covers 'Certain Excavators' exported from the People's Republic of China, described as:

- **Self-propelled track-laying (i.e., tracked) excavators with a 360° revolving superstructure and with an operating weight of 11,000 kg (i.e., 11 tonnes) or more.**

These excavators are currently classifiable within the following commodity code **8429 5210 00**. This code is only given for information and includes 'mini' excavators under 11 tonnes.

The units of measurement to be used in this investigation include kilogram (KG) and metric tonne (MT). For clarity where we refer to 'ton' in the goods description we do not mean the imperial measurement. For the purpose of this investigation ton refers to 1000kg, or metric tonne.

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

Like goods

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

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

Product Control Numbers

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



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

Category	Description	Basic Operating weight
S	Small Excavators	>=11 tonnes <15 tonnes
M	Medium Excavators	>=15 tonnes <20 tonnes
L	Large Excavators	>=20 tonnes <30 tonnes
XL	Extra-Large Excavators	>=30 tonnes

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

Given the relatively low number of sales in the UK Certain Excavator market and the large number of configurations available for purchase (e.g., air conditioning for the cab, dozer blades or not, and different sizes of track shoes), we consider it is not useful to add further PCNs. Instead, any differences in physical characteristics relevant to the calculations (e.g., any costly attachments or options) should be addressed through adjustments.

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

RESPONSE

On the one hand, SANY Heavy Machinery Limited (“SANY Kunshan”), SANY Shanghai, and SANY Heavy Machinery (UK) Ltd (“SANY UK”) – collectively referred to as the “SANY group” – note that there exist other technical and physical characteristics not included in the PCN structure that may affect the price comparison between products. On the other hand, the SANY group understands that, for the purposes of the present investigation, only the most important product characteristics are being considered. Thus, to avoid unnecessary difficulties which may be caused by an over-complicated PCN structure, the SANY group does not recommend adding any other indicator reflecting additional technical or physical characteristics into the proposed PCN structure. The SANY group nevertheless wishes to reserve its right to



comment on other interested parties' or the TRA proposal(s) to modify/extend the PCN.

In addition to the above, the SANY group hereby highlights the following considerations:

- (1) Apart from traditional excavators powered by internal combustion engines, the SANY group also produces electric-powered excavators, some of which fall within the description of the goods concerned in this investigation;
- (2) There are significant distinctions in the physical characteristics, key components, and – to a certain extent – applications of electric excavators compared to excavators with internal combustion engines;
- (3) Given the substantial differences between electric excavators and those with internal combustion engine, the SANY group respectfully submits that electric excavators should be excluded from the scope of the present investigation, particularly because, to the best of the SANY group's knowledge, there is no UK domestic production of electric excavators with an operating weight of 11 tonnes or more.

The SANY group trusts the TRA's judgment as to whether other indicators should be added to the current PCN structure to differentiate between electric excavators and excavators with internal combustion engines. The SANY group remains at the TRA's disposal to provide further information and facilitate the TRA's decision.

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.

RESPONSE

The SANY group notes that the TRA has raised questions about excavators over 50 tonnes. The SANY group accordingly proposes to modify the PCN structure by adding the category "XXL" to describe and distinguish excavators whose weight is equal to or exceeds 50 tonnes.

More specifically, the SANY group suggests revising the current PCN structure as follows to accommodate the factual circumstances of the products produced/sold by SANY group:

- (1) Category "XL" modified from ">=30 tonnes" to ">=30 tonnes <50 tonnes";



(2) Category “XXL added for excavators ≥ 50 tonnes”.

Category	Description	Basic Operating weight
S	Small Excavators	≥ 11 tonnes < 15 tonnes
M	Medium Excavators	≥ 15 tonnes < 20 tonnes
L	Large Excavators	≥ 20 tonnes < 30 tonnes
XL	Extra-Large Excavators	≥ 30 tonnes < 50 tonnes
XXL	Extra-Extra-Large Excavators	≥ 50 tonnes

Please note that, in its questionnaire responses and relative annexes, the SANY group used the above PCN structure.

Please refer to the responses to Questions 4-7 below for details of the reasons for the adjustments suggested above.

- 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.

RESPONSE

The SANY group does not claim any manufacturing process differences that may factor in the PCN structure and the price comparisons between the goods concerned and the like goods.

An Interested Party has requested that a maximum tonne weight is added to the PCN table as the largest Excavators manufactured in the UK are 50 Tonne. Please complete the below questions:

- If a maximum weight limit of 50 tonnes was applied, how would this affect interchangeability and substitutability with excavators over 50 tons?

RESPONSE

The excavators manufactured by SANY producers (i.e., SANY Shanghai and SANY Kunshan above 50-tonne threshold span a broad tonnage range, extending up to [Redacted – commercially sensitive information] tonnes. These ultra extra-large excavators constitute a distinct category and exhibit substantial differences from any categories of smaller excavators below 50 tonnes in terms of essential characteristics and intended usage.



Should it be confirmed that the largest excavators manufactured in the UK are 50 tonnes, the SANY group respectfully submits that excavators with a weight exceeding 50 tonnes should be excluded from the scope of the present investigation.

In any event, to address the distinction between excavators below and above 50 tonnes noted above, the SANY group proposes to incorporate an additional category, i.e., "XXL", to specifically represent products with a weight \geq 50 tonnes as explained above.

5. How does the end use of an excavator with a maximum weight of 50 tonnes differ from the end use of an excavator over 50 tonnes?

RESPONSE

The SANY group submits that excavators with a maximum weight below 50 tonnes, due to their respective tonnages or capacities, are more versatile and adaptable to various purposes or scenarios.

By contrast, excavators exceeding 50 tonnes are predominantly deployed in environments such as mines and other sites that entail excavators with exceptionally high capacities to fulfil their tasks. The end use of excavators below 50 tonnes may not be suitable for these specialised applications, or even if utilised, they may not exhibit the same level of efficiency as their heavier counterparts with a weight exceeding 50 tonnes.

6. How would the imposition of an upper weight limit affect competition between excavators with a maximum weight of 50 tonnes and those above a maximum weight of 50 tonnes?

RESPONSE

The SANY group submits that the imposition of an upper weight limit might potentially affect competition between excavators with a maximum weight of 50 tonnes and those with a weight above 50 tonnes, but primarily competition may be affected in cases of excavators with hovers near the 50-tonne threshold that have similar capacities and specifications.

The competition within the group of excavators with a maximum weight of 50 tonnes (\geq 11 tonnes, $<$ 50 tonnes), and within the group of excavators above 50 tonnes (for the SANY group, \geq 50 tonnes, $<$ [Redacted – commercially sensitive information] tonnes) is unlikely to be affected, as both groups are fundamentally distinct in terms of capacity and intended usage.

7. What is the difference in price and quality between an excavator with a maximum weight of 50 tonnes and an excavator above a maximum weight of 50 tonnes?



RESPONSE

The SANY group highlights that excavators with a weight of 50 tonnes or more span a broad tonnage range, up to [Redacted – commercially sensitive information] tonnes. Their prices can be multiple times higher than excavators with a maximum weight of 50 tonnes. Also, given the varying capacity and performance requirements between excavators with a weight of 50 tonnes or more and excavators with a weight ranging from 11 tonnes to 50 tonnes, the quality and specifications of these excavators differ significantly in terms of power range, durability, and other specifications.



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:	Shanghai SANY Heavy Machinery Co., Ltd.
Legal structure (e.g., limited company, sole trader, partnership etc)	Limited Liability Company
Year of establishment:	20 October 2009
Other operating names:	None
Company registration number:	91310000695797094H
Registered address:	Building A, 318 Lianggang Avenue, Lin-gang Industrial Park, Shanghai
Name (point of contact):	[Redacted – personal information which identifies individuals]
Position:	[Redacted – personal information which identifies individuals]
Address:	[Redacted – commercially sensitive information]
Telephone No:	[Redacted – personal information which identifies individuals]
Email:	[Redacted – personal information which identifies individuals]
Website:	http://www.sanygroup.com

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

Name:	[Redacted – personal information which identifies individuals]
Address:	[Redacted – personal information which identifies individuals]
Telephone No.:	[Redacted – personal information which identifies individuals].



Email:	[Redacted – personal information which identifies individuals]
Confirm they have signed authority to act (Yes/No):	YES
Appendix reference: A1.2 Letter of Authority	

A2 About your company

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

RESPONSE:

SANY Shanghai produces the goods concerned and exports them to the UK, directly or via the related trader SANY UK”).
 During the Period of Investigation (“POI”), SANY Shanghai has exported the goods concerned only via SANY UK.

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
N/A	N/A	N/A

+Add additional rows as required.

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

RESPONSE:

As a general requirement to do business, SANY Shanghai needs to get the Business License from the local Market Supervision and Administration.

Appendix reference: [Appendix A4.3.b Business License](#)

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



RESPONSE:

There is no international production standard (BS / EN etc) for the like goods / goods concerned.

Appendix reference: N/A

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.

RESPONSE:

Not applicable. SANY Shanghai is not a member of any representative organisations.

Appendix reference: N/A

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 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.

RESPONSE:

Please refer to [\[Appendix A3.2 Internal Organisational Structure Diagram – CONFIDENTIAL\]](#) for requested information.

Appendix reference: [Appendix A3.2 Internal Organisational Structure Diagram - CONFIDENTIAL](#)

A4 Board members and principal shareholders

1. Please complete **Section 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 July 2022 – 30 June 2023.
 - b. the Board of Directors during the period of investigation (POI) 1 July 2022 – 30 June 2023.
2. Explain your procedure for appointing the members of the Board of Directors.

RESPONSE:
Not applicable. SANY Shanghai has no Board of Directors.
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.

RESPONSE:
Please kindly refer to the Articles of Association and all the amendments since the establishment of SANY Shanghai attached as [Appendix A4.3.a Articles of Association – CONFIDENTIAL] .
Please refer to the Business License in Appendix A4.3.b Business License , which is also the proof of registration of the Company.
Appendix reference: Appendix A4.3.a Articles of Association - CONFIDENTIAL ; Appendix A4.3.b Business License

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 (the PRC) 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
N/A	N/A	N/A	N/A
			Appendix reference: N/A

+Add additional rows as required.

A6 Accounting practices

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

Records address	What records are held?
[Redacted – commercially sensitive information]	All accounting records

+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.

RESPONSE:

The financial year of SANY Shanghai runs from January 1 to December 31 of each calendar year. No changes have occurred with respect to the above items.

Appendix reference: N/A

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



RESPONSE:

SANY Shanghai's audit reports for 2019, 2020, 2021 and 2022 are provided as **[Appendix A-6.3 Audit Reports – CONFIDENTIAL]**.

SANY Shanghai has a subsidiary Chinese producer, i.e., SANY Kunshan, and a related UK importer, i.e., SANY UK. Please refer to SANY Kunshan's questionnaire responses and SANY UK's Annex I replies for the requested documents.

Appendix reference: **Appendix A6.3
Audit Reports – CONFIDENTIAL**

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

RESPONSE:

Not applicable. The accounts are audited.

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 2022 to 30 June 2023. 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:

- the trial balance which covers the beginning of your financial year and ends on 30 June 2022;
- the trial balance which starts from 1 July 2022 to the end of your next financial year; and
- the trial balance starting from the beginning of your following financial year and ends on 30 June 2023.

RESPONSE:

Please refer to **[Appendix A6.5 – CONFIDENTIAL]** for the trial balances of SANY Shanghai, covering the required periods.

Appendix reference: **Appendix A6.5 Trial
Balances - CONFIDENTIAL**

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



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

RESPONSE:

SANY Shanghai's profit and loss statement 2022 is provided as [\[Appendix A6.6 P&L Statement – CONFIDENTIAL\]](#).

Please refer to the profit and loss statements of these related parties in their respective responses.

Appendix reference: [Appendix A6.6 P&L Statement – CONFIDENTIAL](#)

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

RESPONSE:

SANY Shanghai is a subsidiary of SANY Kunshan, with which SANY Shanghai's accounts is consolidated. Please refer to the consolidated audit reports of 2022 in [\[Appendix A6.7 Consolidated Audit Reports 2022 – CONFIDENTIAL\]](#).

Appendix reference: [Appendix A6.7 Consolidated Audit Reports 2022 – CONFIDENTIAL](#)

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

- your company's chart of accounts; and
- your company's cost centres.

RESPONSE:

The financial accounting system currently used by SANY Shanghai is [Redacted – commercially sensitive information].

The subledgers are recorded on the basis of source documents including purchase and sales invoices, etc. The subledgers are summarized into general ledgers. At the end of each financial period, the general ledgers are further transfer into financial statements.

The company calculates costs on an order-by-order basis.

For our company's chart of accounts, please refer to [Appendix A6.8 – CONFIDENTIAL](#).



Appendix reference: [Appendix A6.8 Chart of Accounts - CONFIDENTIAL](#)

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 concerned or like goods.

RESPONSE:

SANY Shanghai has not changed its financial policies during the injury period.

Appendix reference: N/A

A7 Your company's products

Please complete **Section A7.1 – Your company's products, Annex II.**

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

RESPONSE:

SANY Kunshan, SANY Shanghai and SANY UK adopt the same CCN system. A complete CCN of SANY group is a combination of letters and numbers and consists of four codes indicating (1) product category, (2) main parameter, (3) main characteristic and (4) generation renewal.

- (1) Product category code consists of [Redacted – commercially sensitive information] which stands for excavators produced by SANY group;
- (2) Main parameter code consists of two to four numbers that indicate the weight/tonnage level of the excavator, e.g., [Redacted – commercially sensitive information];
- (3) Characteristic code is one to three letters indicating the types or traits of an excavator such as “[Redacted – commercially sensitive information], etc.
- (4) The code for new-generation excavators of an operating weight >20 tonnes is [Redacted – commercially sensitive information].

Instances for the CCN system are as follows:
[Redacted – commercially sensitive information].

Please refer to Table A7.1 for a more detailed PCN-CCN designation.

Appendix reference: N/A



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

RESPONSE:

The company uses the same product codes across marketing, production, sales and invoicing.

Appendix reference: N/A

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

RESPONSE:

SANY Shanghai has a wide range of products and the product mix for goods concerned and like goods might be different. However, as the PCN or the company's own classification categorized its products into groups for purpose of fair comparison, as long as the goods are the same type, there are no fundamental differences in characteristics between goods concerned and like goods.

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 A7.1 – Your company's products, Annex II** where possible.

RESPONSE:

The main differences between our products exported to the UK and those produced in UK are as follows:

1. Differences in appearance. For example, differences in colour, cover structure and design style.
2. Differences in core components. For example, differences in engine power and main pump displacement.

Please refer to **Section A7.1 – Your company's products, Annex II** for detailed information.

Appendix reference: N/A

5. For each type of the like goods sold on your domestic market and the goods concerned destined for consumption on the UK market, please provide a technical



description as well as translated sales brochures. Please also provide information on:

- technical characteristics
- physical characteristics
- any other important factors.

RESPONSE:

The main differences between our like goods sold on the domestic market and those produced in UK are as follows:

1. Differences in appearance. For example, differences in colour, cover structure and design style.
2. Differences in core components. For example, differences in engine power and main pump displacement.

Please refer to [Appendix A7.5 Sales Brochure – CONFIDENTIAL](#).

Appendix reference: [Appendix A7.5 Sales Brochure – CONFIDENTIAL](#)

5. 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 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 B1.1 – Upwards sales reconciliation, Annex II.**

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

B2 Captive sales

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

B3 Sales

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

RESPONSE:

During the POI, SANY Shanghai sold the products concerned to SANY UK, which resold them on the UK market.
As regards domestic sales, SANY Shanghai sells to unrelated customers as well as related customers.

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.

RESPONSE:

For domestic sales, SANY Shanghai [Redacted – commercially sensitive information]. For exports to UK, SANY Shanghai [Redacted – commercially sensitive information].



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.

RESPONSE:

As explained above, SANY Shanghai [Redacted – commercially sensitive information].

Terms of sale and pricing [Redacted – commercially sensitive information]. After the customer and SANY Shanghai have agreed [Redacted – commercially sensitive information], they will sign a purchase confirmation or contract to fix [Redacted – 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.

RESPONSE:

[Redacted – 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 concerned, including the terms, price changes and renegotiation by either side, etc. Explain the requirements on either party, should the contract be terminated early.

RESPONSE:

The contracts between SANY Shanghai and its customers are [Redacted – commercially sensitive information].

Typically, when negotiating a new deal, SANY Shanghai first makes a price offer based on [Redacted – commercially sensitive information]. If the customer agrees to the price, a contract or order confirmation will be signed. Besides the price, the sales terms stipulated in the contract or order confirmation include [Redacted – 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.

RESPONSE:

The production is scheduled [Redacted – commercially sensitive information].

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 concerned or among customers, regions or time periods.

RESPONSE:

The prices are determined by costs of production and market situation. SANY Shanghai does not have price lists. So this question is not applicable.

Appendix reference: N/A

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.

RESPONSE:

As explained above, the prices are determined by costs and market situation. [Redacted – commercially sensitive information].

Appendix reference: N/A

B4 Sales Transactions

B4.1 UK Sales

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



1. Please provide the sales information for your company’s sales to all customers in the UK in **Section 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 C1 – Adjustments for export sales to the UK**.

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

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

2. If your sales have not been made on a CIF basis, explain below how you have calculated the CIF values included in the ‘CIF value in accounting currency’ column in **Section B4.1 – Sales to the UK, Annex II**.

RESPONSE:

SANY Shanghai’s sales to UK are all made on a [Redacted – commercially sensitive information] basis, and the CIF value reported is based on [Redacted – commercially sensitive information].

Appendix reference: N/A

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

RESPONSE:

Not applicable. There is no such cost incurred by SANY Shanghai’s associated companies which have been paid or reimbursed by SANY Shanghai.

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.

RESPONSE:

Please refer to [\[Appendix B-4.1.4 Sales Documents to UK Customers – CONFIDENTIAL\]](#), which includes:

1. From SANY Shanghai to [Redacted – commercially sensitive information]:
 - Contract
 - Commercial Invoice
 - Packing List
 - Bill of Lading
 - Proof of Payment
2. From [Redacted – commercially sensitive information] to UK customer
 - Order confirmation
 - Invoice
 - Inland Delivery Note and Gate Receipt
 - Proof of Payment

Appendix reference: [Appendix B4.1.4 Sales Documents to UK Customers - CONFIDENTIAL](#)

B4.2 Domestic sales

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

1. Please provide the sales information for your company's sales to all customers in the PRC in **Section B4.2 – Domestic sales, Annex II**. For instructions on filling out and explaining the adjustments for domestic sales, please see **Section C2 – Adjustments for domestic sales** (below).

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



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

For example:

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

RESPONSE:

Please refer to [Appendix B4.2.2 Sales Documents to Domestic Customers - CONFIDENTIAL](#), which includes:

- Contract;
- VAT invoice, and
- Bank Slip.

Appendix reference: [Appendix B4.2.2 Sales Documents to Domestic Customers - CONFIDENTIAL](#)

B5 Currency conversions

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

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

RESPONSE:

Please kindly refer to [Appendix B5.1](#) for the exchange rates the Company used during the POI.

Appendix reference: [Appendix B5.1 Exchange Rates](#)

B6 Sales to other countries



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



SECTION C: Fair comparison

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

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

This section is divided into subsections **C1 – Adjustments on export sales to the UK** and **C2 – Adjustments on domestic sales in the PRC**. 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 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.

RESPONSE:

SANY Shanghai [Redacted – 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.

RESPONSE:

[Redacted – commercially sensitive information].

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.

RESPONSE:

All goods sold by SANY Shanghai to the UK are transported by its associated company: [Redacted – commercially sensitive information]. Exports to the UK incur two types of costs: [Redacted – commercially sensitive information]. [Redacted – commercially sensitive information].

Appendix reference: [N/A](#)

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.

RESPONSE:

The interest rate was decided based on [Redacted – commercially sensitive information].

The credit cost for each sale is obtained with this formula: [Redacted – commercially sensitive information].

Please refer to [Appendix C1.4](#) for the supporting document of the interest rate mentioned above.

Appendix reference: [Appendix C1.4 Source of Interest Rate](#)

5. For the reporting of:

- Differences in after sales costs
- Differences in commissions paid regarding sales under consideration
- Any other adjustments made for differences not provided for in the above

Please state:

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



RESPONSE:

For excavators sold on the domestic (Chinese) market, [Redacted – commercially sensitive information].

Appendix reference: N/A

C2 Adjustments on domestic sales

Adjustments are to be made for each transaction in the relevant columns of the transaction-by-transaction lists requested in **Section 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.

RESPONSE:

[Redacted – 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.

RESPONSE:

[Redacted – commercially sensitive information].

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.

RESPONSE:

[Redacted – commercially sensitive information].

Appendix reference: N/A

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.



RESPONSE:

SANY Shanghai does not claim any adjustments for physical characteristics, as goods with different physical characteristics were sold both to the UK and domestic markets.

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.

RESPONSE:

SANY Shanghai does not claim any adjustments in this respect, as [Redacted – commercially sensitive information].

Appendix reference: [N/A](#)

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

RESPONSE:

SANY Shanghai [Redacted – commercially sensitive information].

Appendix reference: [N/A](#)

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.

RESPONSE:

Please refer to [Appendix C-2.7 Export Tax Refund Rates for Tracked Excavator – CONFIDENTIAL](#).

Appendix reference: [Appendix C2.7 Export Tax Refund Rates for Tracked Excavator – CONFIDENTIAL](#)



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

RESPONSE:

When SANY Shanghai declares an export VAT refund, it reports information such as customs declaration number, VAT invoice number, RMB invoice value and commercial invoice value in foreign currency. When receiving the export VAT refunds for a batch of goods, SANY Shanghai will know which exports these refunds correspond to by referring to the information filled in when applying for this tax refund.

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.

RESPONSE:

As a national practice, the producers are exempt from VAT on imported raw materials. Therefore, the purchase price of the imported raw materials is subtracted from the export value when the export VAT refund is declared. The export VAT refund received by SANY Shanghai is thus not related to the imported raw materials.

Appendix reference: N/A

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.

RESPONSE:

As a national practice, VAT collected when inputs are purchased is refunded upon exporting the goods concerned. There is no other indirect tax rebated or not collected on the products exported by SANY Shanghai to the UK and to third countries.

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.

RESPONSE:

Please refer to [Appendix C-2.7 Export Tax Refund Rates for Tracked Excavator – CONFIDENTIAL](#).



Appendix reference: [Appendix C2.7
Export Tax Refund Rates for Tracked
Excavator – CONFIDENTIAL](#)

- 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.

RESPONSE:

Amount of VAT refund = [Redacted – commercially sensitive information].
Tax base = [Redacted – commercially sensitive information].

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.

RESPONSE:

SANY Shanghai files the VAT return forms by the 15th of each month and prepays corporate income tax by the 15th of the month following the end of each quarter. [Redacted – commercially sensitive information].

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.

RESPONSE:

The interest rate was decided based on [Redacted – commercially sensitive information].
The credit cost for each sale is obtained with this formula: [Redacted – commercially sensitive information].
Please refer to [Appendix C1.4](#) for the supporting document of the interest rate mentioned above.



Appendix reference: [Appendix C1.4 Source of Interest Rate](#)

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.

RESPONSE:

SANY Shanghai [Redacted – commercially sensitive information].

Appendix reference: N/A

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

RESPONSE:

[Redacted – commercially sensitive information].

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.

RESPONSE:

Not applicable. No adjustment has been included for other factors not provided for above.

Appendix reference: N/A



SECTION D: Costs and performance

D1 Turnover

1. Please complete **Section 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 D2 – Income statement, Annex II** with information about all the goods your company produces, for the injury period.
2. Please attach copies of your (corporate) income tax statements, any other company tax statements and the corresponding tax returns for the POI and the preceding three financial years.

RESPONSE:

Please refer to [Appendix D2.2.a Income Tax Statements - CONFIDENTIAL](#) and [Appendix D2.2.b VAT Statements - CONFIDENTIAL](#) for 2019, 2020, 2021 and 2022.

Appendix reference: [Appendix D2.2.a Income Tax Statements – CONFIDENTIAL](#); [Appendix D-2.2.b VAT Statements – CONFIDENTIAL](#)

D3 Production

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



RESPONSE:

The production process of an excavator involves a range of specialized facilities to perform various tasks. A breakdown of the major production facilities and their corresponding production activities is as follows:
 [Redacted – commercially sensitive information].

Appendix reference: N/A

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

RESPONSE:

The production process of an excavator involves several key steps, i.e., blanking, bending and forming, welding, machining, painting, assembly, inspection and adjustment. In general and simple terms, these stages can be described as follows:

Blanking: [Redacted – commercially sensitive information]

Bending & Forming: [Redacted – commercially sensitive information].

Welding: [Redacted – commercially sensitive information].

Machining: [Redacted – commercially sensitive information].

Painting: [Redacted – commercially sensitive information].

Assembly - Upper structure and Undercarriage: [Redacted – commercially sensitive information].

Boom and Arm Assembly: [Redacted – commercially sensitive information].

Complete Excavator Assembly: [Redacted – commercially sensitive information].

Inspection and Adjustment: [Redacted – commercially sensitive information].

Please refer to **Appendix D3.2 Production Process Flowchart - CONFIDENTIAL**

Appendix reference: **Appendix D3.2 Production Process Flowchart - CONFIDENTIAL**

- 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).

RESPONSE:

The main raw materials used in production are [Redacted – commercially sensitive information].

Some raw material suppliers are [Redacted – commercially sensitive information].

Some raw materials are [Redacted – commercially sensitive information].

[Redacted – commercially sensitive information].

Appendix reference: N/A

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

RESPONSE:

[Redacted – commercially sensitive information].

Appendix reference: N/A

D4 Upwards cost reconciliation

1. Complete **Section D4 – Upwards cost reconciliation, Annex II.**

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

D5 Capacity

1. Complete **Section D5 – Capacity, Annex II.**

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

RESPONSE:

The production capacity is calculated according to the capacity of the excavator lines of our company. Capacity utilisation = actual production quantity / production capacity.



The calculation of capacity is based on the number of workers per month and the number of units produced per person. In June 2023, for example, [Redacted – commercially sensitive information].

Appendix reference: N/A

D6 Stocks

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

RESPONSE:

SANY Shanghai [Redacted – commercially sensitive information].

Appendix reference: N/A

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

RESPONSE:

[Redacted – commercially sensitive information].

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 concerned and like goods.

RESPONSE:

[Redacted – commercially sensitive information].

Appendix reference: N/A



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

RESPONSE:

Not applicable. No joint products are generated from the production process of the goods concerned.

Appendix reference: N/A

- Please explain how your costs of production (per unit) differ between the goods concerned and/or the like goods and its joint products, if any, at the point of divergence. Comment on the reason for this difference and explain your method(s) of calculation.

RESPONSE:

Not applicable. No joint products are generated from the production process of the goods concerned.

Appendix reference: N/A

D8 Purchases

- Please complete **Section 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.
- Within your company, do you use any integrated processes in the production of the goods concerned? If so, please explain.

RESPONSE:

SANY Shanghai produces the goods concerned itself since it has its own complete excavator production lines.

Appendix reference: N/A

- If you use any integrated processes does this require materials to be purchased from external suppliers? If so, where are these purchased from?

RESPONSE:



SANY Shanghai outsources materials such as [Redacted – commercially sensitive information]. Our company purchases [Redacted – commercially sensitive information].

Appendix reference: N/A

D9 Profitability and administration, selling and general costs

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

RESPONSE:

Profitability = [Redacted – commercially sensitive information].
Net profit = [Redacted – commercially sensitive information] .
Please refer to Table D-2 Income statement for the breakdown for calculation of profitability.

Appendix reference: N/A

D10 Cost to make (CTM) in the PRC

1. Please provide the CTM for your domestic market (the PRC) by completing **Section D10.1 – CTM in the PRC, Annex II**.
 - Provide details for each PCN of your goods during the POI, produced by your company or an associated party.
 - If there are PCNs that were produced to be sold for export to the UK (but were not sold domestically) please include these.
 - For each associated party, make a new copy and complete the spreadsheet annex separately.
 - Note that subheadings of each line item (e.g. raw materials, energy) can be changed to suit the categorisation of your own cost accounting system.
2. If there are differences in production costs for the same PCN between your like goods and the goods concerned, explain the reasons for the differences.



RESPONSE:

The costs for the same type of product, either as like goods or the goods concerned, are the same, as the raw materials and production process are the same and our company's cost accounting is the same for export sales and domestic sales.

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)

RESPONSE:

The raw material is booked [Redacted – commercially sensitive information], and the manufacturing overheads is [Redacted – commercially sensitive information].

Appendix reference: N/A

4. If any of your CTM inputs includes semi-finished goods, please describe the breakdown of cost and components of the semi-finished goods.

RESPONSE:

Not applicable. The CTM does not include semi-finished goods.

Appendix reference: N/A

5. 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.

RESPONSE:

Not applicable. Our company has not incurred any extraordinary costs.

Appendix reference:

6. 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.

RESPONSE:

SANY Shanghai's sources of finance are [Redacted – commercially sensitive information]

Appendix reference: N/A



D11 AS&G in the PRC

1. Please provide AS&G costs for the like goods produced for your domestic market (the PRC) by completing **Section 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.
 - If there are PCNs sold for export to the UK (but not sold domestically) please include these PCNs and estimate what the associated AS&G cost would be domestically.
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.

RESPONSE:

The AS&G are [Redacted – commercially sensitive information]

Appendix reference: N/A

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

RESPONSE:

There are no differences in costs for the same cost type between our company's goods concerned and like goods.

Appendix reference: N/A

D12 Raw material (RM) and major input purchases

1. Please complete **Section 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 – RM Purchased, Annex II**. Use the box below to give an overview of any supporting documents provided.

RESPONSE:

Please refer to [Appendix D12.1 Sample Invoices of Raw Material Purchase - CONFIDENTIAL](#).

Appendix reference: [Appendix D12.1 Sample Invoices of Raw Material Purchase - CONFIDENTIAL](#)

2. If you purchase materials or inputs from associated suppliers, please provide information about how prices are set, the negotiation process on price setting; and any contracts or evidence of price negotiation. In addition to the 'Cost to make (CTM)' sheets for Domestic sales (**D10.1 - CTM in the PRC, Annex II**), 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 – RM Purchased, Annex II**), labelling it as 'Associated supplier CTM'.

RESPONSE:

Please refer to [D12 – RM Purchased, Annex II](#). SANY Shanghai does purchase materials or inputs from associated suppliers, and the price are set by the suppliers based on the cost of production and target profit, taking consideration into market situation and supply-demand relationship. The Sany group has a system [Redacted – commercially sensitive information]. Please refer to [Appendix D12.2 - CONFIDENTIAL](#) for the supporting document of price setting.

Appendix reference: [Appendix D12.2 Supporting Document of Price Setting](#)

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.

RESPONSE:

Raw material purchase contracts between SANY Shanghai and the suppliers stipulate the [Redacted – commercially sensitive information].



Appendix reference: [N/A](#)

D13 Specificities regarding the exporting country

The TRA is investigating claims that distortions exist in the market for Certain Excavators in the PRC as a result of state planning and government intervention. This includes horizontal distortions in the PRC and specific distortions affecting the PRC Certain Excavator market.

Claims of horizontal distortions include:

- All aspects of supply chain influenced by GOC and are subject to policy supervision and guidance from the Chinese Communist Party (CCP).
- State support affecting manufacturers' costs of production, in particular through the 14th Five-Year Plan for Economic and Social Development (2021-2025) ("FYP14").

Claims of specific distortions include:

- The PRC Certain Excavator market as a whole.
- Energy cost.
- Cost of raw materials.
- Labour cost.
- Shipping and logistics costs.
- Research and development cost.
- Cost of land or rent.
- Finance cost.
- Tax and regulatory cost.

1. Supply chains

Claims have been made that all aspects of supply chains are influenced by GOC and are subject to policy supervision and guidance from the Chinese Communist Party (CCP). Please refer to '[Appendix E.2.1.001: Methodology for calculating normal value](#)' for the full allegations relating to this claim.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of supply chains (whether domestically or for export) of Certain Excavators.



RESPONSE:

There are no government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of supply chains (whether domestically or for export) of Certain Excavators.

Appendix reference: N/A

2. Cost of production

Claims have been made that state support affects manufacturers' costs of production, in particular through the 14th Five-Year Plan for Economic and Social Development (2021-2025) ("FYP14"). Please refer to '[Appendix E.2.1.001: Methodology for calculating normal value](#)' for the full allegations relating to this claim.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of cost of production (whether domestically or for export) of Certain Excavators.

RESPONSE:

There are no government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of cost of production (whether domestically or for export) of Certain Excavators.

Appendix reference: N/A

3. The PRC Certain Excavator market as a whole

Claims have been made that the GOC intervenes heavily in, and thereby distorts, the entire chain of costs and prices in the PRC Certain Excavator market. Please refer to '[Appendix E.2.1.001: Methodology for calculating normal value](#)' for the full allegations relating to this claim.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of the PRC Certain Excavator market as a whole (whether domestically or for export).

RESPONSE:

There are no government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of the PRC Certain Excavator market as a whole (whether domestically or for export).



Appendix reference: [N/A](#)

4. Energy cost

Claims have been made that energy costs incurred by the PRC Certain Excavator manufacturers are distorted as a result of GOC intervention in the energy market. Please refer to '[Appendix E.2.1.001: Methodology for calculating normal value](#)' for the full allegations relating to this claim.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of energy cost (whether domestically or for export) of Certain Excavators.

Please also complete Annex III and provide the requested evidence.

RESPONSE:

There are no government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of energy cost (whether domestically or for export) of Certain Excavators. All utilities used by SANY Shanghai are charged at normal rates that is applicable universally to all users located in the same administrative division with SANY Shanghai. There is no special or subsidized rate charged.

Appendix reference: [Appendix D13.4 Electricity Invoice – CONFIDENTIAL](#)

5. Cost of raw materials

Claims have been made that as a result of GOC control and intervention, the cost of all key raw materials to manufacture Certain Excavators is distorted in the PRC. Please refer to '[Appendix E.2.1.001: Methodology for calculating normal value](#)' for the full allegations relating to this claim.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of the cost of raw materials (whether domestically or for export) of Certain Excavators.

Please also complete Annex III and provide the requested evidence.

RESPONSE:



There are no government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of the cost of raw materials (whether domestically or for export) of Certain Excavators. Raw materials and inputs are procured based on [Redacted – commercially sensitive information]. Some materials [Redacted – commercially sensitive information]. SANY Shanghai's purchase prices for raw materials reflect the prices on the international market. There is no restriction or condition on imports of raw materials used by SANY Shanghai.

Appendix reference: N/A

6. Labour costs

Claims have been made that labour costs are distorted in the PRC as a result of non-commercial factors, including explicit and implicit control by the GOC. Please refer to '[Appendix E.2.1.001: Methodology for calculating normal value](#)' for the full allegations relating to this claim.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of labour costs (whether domestically or for export) of Certain Excavators.

Please also complete Annex III and provide the requested evidence.

RESPONSE:

There are no government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of labour costs (whether domestically or for export) of Certain Excavators. SANY Shanghai recruits its personnel directly from the labour market or through internal referrals, within the framework of Labour Law in China PR.

Appendix reference: N/A

7. Shipping and logistics costs

Claims have been made that shipping and logistics costs, which, given the size and weight of Certain Excavators and their parts, are significant cost centres, are distorted as a result of GOC intervention. Please refer to '[Appendix E.2.1.001: Methodology for calculating normal value](#)' for the full allegations relating to this claim.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have



impacted any aspect of shipping and logistics costs (whether domestically or for export) of Certain Excavators.

Please also complete Annex III and provide the requested evidence.

RESPONSE:

There are no government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of shipping and logistics costs (whether domestically or for export) of Certain Excavators.

Appendix reference: [N/A](#)

8. Research and development cost

Claims have been made that the Certain Excavator industry is a research-intensive industry, and R&D costs are a significant cost centre for Certain Excavator manufacturers, and that R&D costs for PRC Certain Excavator manufacturers are distorted as a result of state control and intervention. Please refer to '[Appendix E.2.1.001: Methodology for calculating normal value](#)' for the full allegations relating to this claim.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of research and development costs (whether domestically or for export) of Certain Excavators.

Please also complete Annex III and provide the requested evidence.

RESPONSE:

There are no government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of research and development costs (whether domestically or for export) of Certain Excavators.

Appendix reference: [Appendix D13.8 R&D Invoice – CONFIDENTIAL](#)

9. Cost of land or rent

Claims have been made that there are (at least) three key GOC interventions that distort the cost of land or rent for Certain Excavator manufacturers. These are (1) all land in the PRC is ultimately owned by the GOC, (2) GOC continues to determine how industrial land is used, and (3) GOC exempts some land from land use tax.



Please refer to '[Appendix E.2.1.001: Methodology for calculating normal value](#)' for the full allegations relating to this claim.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of land or rent costs (whether domestically or for export).

Please also complete Annex III and provide the requested evidence.

RESPONSE:

There are no government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of land or rent costs (whether domestically or for export).

Appendix reference: [Appendix D13.9 Land Use Right Certificate - CONFIDENTIAL](#)

10. Finance cost

Claims have been made that GOC interventions distort the finance cost for PRC Certain Excavator manufacturers through a variety of instruments including preferential loans and credit lines, equity infusions, and grants. Please refer to '[Appendix E.2.1.001: Methodology for calculating normal value](#)' for the full allegations relating to this claim.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of finance costs (whether domestically or for export) of Certain Excavators.

Please also complete Annex III and provide the requested evidence.

RESPONSE:

There are no government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of finance costs (whether domestically or for export) of Certain Excavators.

Appendix reference: [Appendix D13.10 Loan Contract - CONFIDENTIAL](#)

11. Tax and regulatory cost



Claims have been made that as a matter of policy, the GOC artificially reduces tax and regulatory costs for PRC manufacturers, including Certain Excavator manufacturers, in order to confer benefits on these manufacturers. Please refer to [‘Appendix E.2.1.001: Methodology for calculating normal value’](#) for the full allegations relating to this claim.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of tax and regulatory costs (whether domestically or for export).

Please also complete Annex III and provide the requested evidence.

RESPONSE:

There are no government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of tax and regulatory costs (whether domestically or for export).

Appendix reference: N/A

D13.1 Proper Comparison

If the TRA determines that a particular market situation existed during the POI, the TRA must consider whether because of that particular market situation such sales do not permit a proper comparison between the like goods and the goods concerned.

1. Please comment and provide evidence on:

The effect that the alleged particular market situation has on Certain Excavator prices in the domestic market of the PRC.

RESPONSE:

Not applicable. There is no particular market situation in the PRC.

Appendix reference: N/A

2. The effect that the alleged particular market situation has on Certain Excavator export prices from the PRC to the United Kingdom.

RESPONSE:

Not applicable. There is no particular market situation in the PRC.

Appendix reference: N/A



3. Whether the effect of the alleged particular market situation is such that the domestic prices in the PRC and export prices from the PRC to the UK cannot be properly compared.

RESPONSE:

Not applicable. There is no particular market situation in the PRC.

Appendix reference: N/A

4. Please comment and provide evidence on the prevailing conditions of competition in the market in the Certain Excavator market in the PRC, including:
- A description of the Certain Excavator market in the PRC;
 - the demand for Certain Excavators in the PRC;
 - the factors that influence consumption/demand for Certain Excavators in the PRC;
 - Any other factors relevant to conditions of competition for Certain Excavators in the PRC.

RESPONSE:

● **Market Description:**

The growth of Chinese construction machinery brands has been nurtured within a highly competitive market, cultivating strong competitiveness among Chinese construction machinery enterprises. Over the past decade, China has become the epicentre of some of the world's largest and most challenging engineering projects, placing high demands on construction machinery and providing a fertile ground for the growth of domestic construction machinery corporations. Simultaneously, China, as one of the world's fastest-growing construction machinery markets, has attracted outstanding foreign brands and international industry leaders to localise their production in China.

Shaped by such context, the Chinese excavator market is characterised as fully market-oriented and highly competitive. There are multiple market players producing and marketing excavators on the Chinese market and export markets, driven by overarching goals to maximise profit and achieve market success by developing, producing and marketing competitive, high-quality and cost-efficient products. To the best of the SANY group's knowledge, there are approximately 26 excavators' producers in China, both domestic or foreign invested, in China varying in size from large corporations to medium and small-sized enterprises.

● **Demand of excavators concerned:**

The demand for excavators concerned in the PRC is contingent upon several factors, such as the overall economic situation of the country, the development of the construction and mining industries and other downstream industries which rely on the products.



● Factors influencing consumption/demand:

The SANY group submits that the Chinese excavator industry is a market-oriented and competitive industry. Factors affecting the competition situation in other industries, such as the number of operators, the evolvement of demand and consumption, etc., also have an impact on the level of competition in the excavator industry.

Appendix reference: N/A

5. Please comment and provide evidence on the relationship between price and cost for Certain Excavators in the PRC, including:

- How pricing expectations are set for the Certain Excavator market in the PRC.
- The process for how you determine the selling price of Certain Excavators in the PRC.
- Any other factors that influence on your pricing decisions in the PRC.

RESPONSE:

● How pricing expectations are set

In the highly competitive excavator market in the PRC, the SANY group, as a private enterprise operating with no external interference from the government, adopts a pricing strategy that is primarily driven by a combination of cost considerations and market conditions. Setting pricing expectations involves a comprehensive analysis of the production costs, including manufacturing, labour, and material expenses. Market conditions, such as demand and competition, also factor in the pricing strategy to ensure that it aligns with the prevailing economic situation.

● Determination process of selling price

The process for determining the selling price of excavators concerned begins with a thorough assessment of production costs. This involves calculating the expenses incurred in manufacturing, assembly, quality control, sales and administration, etc. Additionally, considerations are made for labour costs and raw material expenses, ensuring that the selling price covers these costs while allowing for a reasonable profit margin.

Then, an analysis of the competitive landscape, demand fluctuations, and the overall economic situation in the PRC guides the pricing strategy. The goal is to strike a balance between maximizing profit and remaining competitive within the industry.

● Other factors that influence on pricing decisions

Other factors influencing pricing decisions may include innovations in technology and customer preferences. Continuous improvements in product features and the introduction of advanced technologies may cater better to the customers' needs, thereby justifying higher prices. As a fully private corporation operating in a dynamic and competitive market, SANY Shanghai is not interfered by other non-market factors.

Appendix reference: N/A



SECTION E: Other questions

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

1. Please indicate any other factors which might have caused the injury to the UK industry, for example:

- volume and prices of imports not sold at dumped prices.
- contraction in demand or changes in patterns of consumption.
- restrictive trade practices of, and competition between, third country and UK producers.
- developments in technology; and
- export performance and the productivity of the UK.

RESPONSE:

N/A.

Appendix reference:

2. Please describe how you would expect the implementation of a trade remedy to affect :

- your exports of the goods concerned to the UK
- market price of the goods in the UK.

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

RESPONSE:

N/A.

Appendix reference:



SECTION G: Checklist and appendices

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

Section	Please tick if you have responded to all questions
Section A – Company structure and operations	<input checked="" type="checkbox"/>
Section B – Sales	<input checked="" type="checkbox"/>
Section C – Fair comparison	<input checked="" type="checkbox"/>
Section D – Costing information	<input checked="" type="checkbox"/>
Section E – Other questions	<input checked="" type="checkbox"/>
Section F – Declaration	<input checked="" type="checkbox"/>

+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
Appendix A1.2	Letter of Authority
Appendix A3.2	Internal Organisational Structure Diagram - Confidential
Appendix A4.3.a	Articles of Association - Confidential
Appendix A4.3.b	Business License
Appendix A6.3	Audit Reports - Confidential
Appendix A6.5	Trial Balances - Confidential
Appendix A6.6	P&L Statement - Confidential
Appendix A6.7	Consolidated Audit Reports 2022 - Confidential
Appendix A6.8	Chart of Accounts - Confidential
Appendix A7.5	Sales Brochure - Confidential
Appendix B4.1.4	Sales Documents to UK Customers - Confidential
Appendix B4.2.2	Sales Documents to Domestic Customers - Confidential
Appendix B5.1	Exchange Rates
Appendix C1.4	Source of Interest Rate



Appendix C2.7	Export Tax Refund Rates for Tracked Excavator - Confidential
Appendix D2.2.a	Income Tax Statements - Confidential
Appendix D2.2.b	VAT Statements - Confidential
Appendix D3.2	Production Process Flowchart - Confidential
Appendix D12.1.a	Sample Invoices of Raw Material Purchase - Confidential
Appendix D12.1.b	Sample Invoices Raw Materials - Confidential
Appendix D12.2	Supporting Document of Price Setting - Confidential
Appendix D13.4	Invoice for Electricity Purchase - Confidential
Appendix D13.8	Invoice for R&D Expenses - Confidential
Appendix D13.9	Land Use Right Certificate - Confidential
Appendix D13.10	Loan Contract - Confidential

+Add additional rows as required