



## Verification report – Overseas Exporter Case AD0071: Hot-rolled steel plates exported from the Republic of Korea

|                                       |  |
|---------------------------------------|--|
| <b>Period of Investigation (POI):</b> | 1 April 2024 to 31 March 2025  |
| <b>Injury Period:</b>                 | 1 April 2021 to 31 March 2025  |
| <b>Date of report:</b>                | 10 March 2026  |
| <b>Case team contact details:</b>     | <a href="mailto:AD0071@traderemedies.gov.uk">AD0071@traderemedies.gov.uk</a> |
| <b>Interested Party verified:</b>     | POSCO  |

For further details, please see the [Notice of initiation](#) on the public file.



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## Executive Summary

The Trade Remedies Authority (TRA) is conducting an anti-dumping investigation to determine whether injury is being caused to the United Kingdom (UK) due to dumping of hot-rolled steel plates imported into the UK from the Republic of Korea (ROK).

More information about the case can be found on the public file:

[Case AD0071 public case file](#)

POSCO, an overseas producer of the goods concerned, returned a completed overseas exporter questionnaire ('questionnaire response'). POSCO produced the goods concerned and sold them domestically in the ROK and exported to the UK and other markets during the Period of Investigation (POI).

The TRA sought to verify the completeness, relevance and accuracy of the information submitted

- We conducted a remote walkthrough of POSCO's accounting system, to gain an understanding of the accounting function and associated systems and controls, to enable us to assess the level of reliance that can be placed on the data submitted.
- We conducted an in-person verification exercise to evaluate the completeness, relevance and accuracy of information provided in the questionnaire response.
- We checked information provided in the questionnaire response regarding general company set-up and associations against information on POSCO's corporate website and other open sources, as well as to its audited financial statements. We also confirmed details were consistent with company secretarial records and discussed ownership and corporate structure with management and legal representatives.
- We reconciled questionnaire responses with information held in POSCO's accounting system and financial statements, to consider the completeness, relevance and accuracy of the submission.

Based on the verification activity undertaken the TRA has a reasonable level of assurance on the completeness, relevance and accuracy of the information provided by POSCO and can use it for the purpose of this investigation. No material findings were identified, and no major issues were observed.

## Purpose of verification

The purpose of the TRA's verification activity is to determine whether the information provided by interested parties is complete, relevant, and accurate and can be used



in our investigation. This verification report sets out the conclusions reached for each component part that covers the scope of our work. It also provides an overall conclusion stating the level of assurance reached.

The information verified may then be considered in our assessments and analysis to determine whether dumping has occurred, and if this dumping is causing injury to the UK industry. This will form the basis for establishing appropriate measures where necessary, and to assess whether these are in the UK's economic interest.

We carried out verification activities onsite. The TRA did not seek to verify all information provided, but undertook the work considered appropriate and possible within the time constraints of the investigation to obtain assurance upon which to base our case decision.

This verification report documents the work completed, providing an overview of the range and scope of verification procedures performed, for each component part that covers the scope of our work, on the information submitted by POSCO. It details the conclusions regarding completeness, relevance and accuracy, and provides an overall conclusion stating the level of assurance reached.

## Confidential information

POSCO must provide a non-confidential version of the verification report marked as 'non-confidential' in the header.

If any information contained in the verification report is considered confidential, POSCO should delete or redact those sections and provide a non-confidential summary of the information which has been removed. It must provide reasons as to why the particular information is considered confidential (see also [public guidance](#)).

The non-confidential version of the verification report will be placed on the public file.



## Verification

Please find below a summary of work completed by the TRA to determine whether the information provided by POSCO in their questionnaire response is complete, relevant, and accurate.

### A. Company structure and associations

|  |
|--|
| What information was considered  |
| <ul style="list-style-type: none"> <li>• Company details including date of incorporation, company addresses, etc</li> <li>• General company structure, ownership and management</li> <li>• Associations with other companies</li> <li>• Accounting compliance and auditor’s opinion</li> </ul>   |
| <p><i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see <a href="#">Confidential information</a>):</i></p>   |
| How the information was checked  |
| <p>We checked POSCO’s company structure and its declared associations to gain an understanding of operations and corporate relationships. This process enabled us to confirm the completeness and accuracy of the information provided.</p> <p><b>Company details</b><br/>We cross-checked information submitted by POSCO to its audited financial statements for the period ending 31 December 2024, and to other sources including its corporate website.</p> <p><b>General company structure, ownership and management</b><br/>We cross-checked details provided by POSCO on its structure, ownership, and management with documentation submitted in the questionnaire response, as well as to publicly available information, such as the POSCO company website. We confirmed that POSCO Holdings Inc. is the ultimate controlling party.</p> <p><b>Associations with other companies</b><br/>We reviewed the questionnaire response and did not identify any undeclared associated parties. We also discussed with POSCO personnel and legal representatives the nature of relationships with other corporate entities and found no inconsistencies when compared to our own research against independent auditor reports and open-source websites.</p> <p><b>Accounting compliance and auditor’s opinion</b><br/>The statutory financial statements of POSCO are produced in accordance with the Korean Standards on Auditing which is governed by the Korean International Financial Reporting Standards (K-IFRS). The independent auditor issued an</p> |



unmodified opinion on the financial statements for the year ended 31 December 2024. We have also reviewed the DART system, South Korea’s public corporate disclosure platform, to obtain the relevant audit report.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

**Exceptions/Findings/Adjustments**

None.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

**Conclusions**

The information relating to company structure and associations provided by POSCO is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for dumping and injury assessments and for any other purpose within the investigation.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

**B. Accounting systems and procedures**

**What information was considered**

- Accounting systems
- Accounting policies, risks and financial statements
- Sales and customer order process
- Purchase and supplier order process

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

**How the information was checked**

We conducted a remote walk-through of POSCO’s accounting systems and data extraction procedures to ascertain the level of reliance that can be placed on the data processed. This included a review of the systems and controls underpinning the sales and purchasing processes, as well as an end-to-end walk-through of a



sampled sale and purchase transaction, following the data from order, through fulfilment and ultimately settlement.

**Accounting systems**

POSCO demonstrated the use of [Redacted as this section describes POSCO’s specific internal accounting system]. We were able to follow examples of the key functions and integrations.

**Accounting policies, risks and financial statements**

We reviewed the full audited financial statements for the reporting period ended 31 December 2024, which we confirmed were prepared in line with K-IFRS and were independently audited. We found no high-risk or high complexity areas.

**Sales and customer order process**

We selected a random sales transaction to observe the procedural overview of sales order, fulfilment and settlement. POSCO demonstrated how the sales order was placed by the relevant customer, its invoice issuing process, and its delivery and settlement processes via a walk-through of its accounting system. In addition, we requested source documentation and other evidence and explanations to underpin our understanding.

**Purchase and supplier order process**

POSCO demonstrated via a walk-through of its accounting system how a randomly selected purchase order was processed, and how logistics and payments were tracked. In addition, we requested source documentation and other evidence and explanations to underpin our understanding.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

This information is related to POSCO’s internal accounting systems. For this reason, such information is redacted.

**Exceptions/Findings/Adjustments**

None.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

**Conclusions**

Based on the work performed, we have obtained a basic understanding of the relevant accounting and associated business systems of POSCO. This enabled us to plan appropriate verification procedures.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*



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### C. Goods

|  |
|--|
| What information was considered  |
| <ul style="list-style-type: none"> <li>• Goods description and comparability to the goods concerned</li> <li>• Product Control Number (PCN) allocations</li> <li>• Internal coding system</li> </ul>   |
| <p><i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see <a href="#">Confidential information</a>):</i></p>   |
| How the information was checked  |
| <p>We checked the information submitted in POSCO’s questionnaire response to determine the accuracy of assigning PCNs to the like goods, as well as to determine its submission correctly differentiated between goods within the scope of the investigation and those that were out of scope. We found no evidence of inaccuracies.</p> <p><b>Goods description, PCN allocations and internal coding system</b><br/>         POSCO’s management explained how each hot-rolled plate produced has a unique item code and, using this item code, POSCO created a bespoke SAS (Statistical Analysis System) program to search and map internal product codes [redacted – internal accounting system] to the PCNs in the scope of the investigation. We reviewed the methodology and performed procedures to consider the accuracy of the translation of product attributes between source material and system data. In addition, we considered the data manipulation techniques used to adjust the system data and populate the questionnaire response. We found no irregularities. We also found no evidence of out of scope products being inadvertently included. Finally, during ‘downwards verification’, a form of testing involving checking for accuracy and relevance (see <a href="#">Section E. Sales</a>), we considered the accuracy and relevance of PCNs by comparing the questionnaire responses to underlying source material. We found no examples of inaccuracy.</p> <p><i>If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see <a href="#">Confidential information</a>):</i></p> |
| <p>This information is related to POSCO’s internal accounting system. For this reason, such information is redacted.</p>   |
| Exceptions/Findings/Adjustments  |
| <p>None.</p>   |



*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

### Conclusions

The information provided by POSCO relating to the company's goods is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for dumping and injury assessments and for any other purpose within the investigation.

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## D. Costs

### What information was considered

- Completeness of cost data
- Transaction testing
- Cost allocation testing
  - Raw materials
  - Manufacturing overheads
  - Administration, selling and general (AS&G) costs

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

### How the information was checked

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

#### **Completeness of cost data**

As part of pre-visit verification work, we obtained trial balance extracts from POSCO to enable us to create a version of the underlying accounting cost to make and sell data which aligned with the POI, as well as trial balance records that aligned to the statutory accounting period. We used these extracts to reconcile data between the audited financial statements and POI-aligned questionnaire response and found a material difference. During the in-person verification visit, POSCO demonstrated to us how to correctly reconcile the cost to make and sell data to the audited financial statements by using the relevant inventory data in the trial balances and inventory ledger. The explanations and evidence provided were



reasonable and we were able to gain assurance of the completeness of the cost data provided.

**Transactional testing**

We selected a sample of raw materials purchase transactions to consider their relevance and accuracy, as well as to agree them to underlying source documentation. This included retrieving purchase orders, invoices, delivery records, and proof of payment, as well as other contractual and supporting information provided by POSCO management.

For some transactions we noted that the raw material prices were subject to adjustment, which were subsequently made to the final invoices. As these price adjustments fell outside of the POI, no subsequent revisions were requested from POSCO. For all tested transactions, we were able to gain assurance of the accuracy and relevance of the cost transactions through scrutiny of the requested documentation.

**Cost allocation testing**

During on-site verification, POSCO presented how costs are recorded in its [redacted – commercially sensitive information] accounting system [redacted – confidential internal cost recording process]. We reviewed the output from this process and identified a wide range of cost allocations and some possible outliers. POSCO were able to explain these outliers adequately.

At our request, POSCO were able to show us the costs [redacted – commercially sensitive information] which enabled us to gain assurance over how the costs have been extracted from the financial system to populate the annex.

**Exceptions/Findings/Adjustments**

None.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

This information is related to POSCO’s internal accounting system. For this reason, such information is redacted.

**Conclusions**

The information relating to costs provided by POSCO is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for dumping and injury assessments and for any other purpose within the investigation.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*



## E. Sales

### What information was considered

- Completeness of sales data
- Transaction testing
- Price reductions

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

### How the information was checked

#### **Completeness of sales data**

As part of pre-visit verification work, we obtained trial balance extracts from POSCO management to enable us to create a POI-aligned version of the underlying accounting sales data, as well as trial balance records that aligned to the statutory accounting period. We used these extracts to reconcile data between the audited financial statements and POI-aligned questionnaire response without issue.

#### **Transactional testing**

We carried out transaction testing to compare data submitted in the questionnaire response to underlying source material for the purposes of assessing the accuracy and relevance of sales transactions listed in the questionnaire response. We selected a sample of domestic and export sales transactions from POSCOs submitted sales annexes, and POSCO provided documentation for all selected transactions, including purchase orders, invoices, and bank payment records.

One immaterial difference in relation to inspection cost was identified during our testing. POSCO corrected this difference and submitted a revised annex.

#### **Price reductions**

We have enquired with the management of POSCO and checked relevant sales documentation. We are satisfied that POSCO had correctly reported price reductions in its questionnaire response.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

### Exceptions/Findings/Adjustments



None.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

### Conclusions

The information relating to sales provided by POSCO is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for dumping and injury assessments and for any other purpose within the investigation.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

## F. Fair Comparison

### What information was considered

- Discounts
- Transportation, insurance, handling, and loading costs
- Credit
- After sales costs
- Commissions
- Warehousing
- Inspection

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

### How the information was checked

#### **Fair comparison adjustments for export sales**

POSCO reported that it made adjustments to export sales on domestic freight, ocean freight, loading charge, and credit.

During on-site verification, POSCO demonstrated that:

- Domestic freight was calculated based on [redacted – confidential internal calculation method].
- Ocean freight costs were based on [redacted – confidential internal calculation method].
- Loading charges were based on [redacted – confidential internal calculation method].



- Credit was calculated based on [redacted – confidential internal calculation method].

We reviewed the questionnaire annex, and no other adjustments were identified.

**Fair comparison adjustments for domestic sales**

POSCO reported that it made adjustments to domestic sales on discounts, domestic freight, transport, handling, credit, after sales costs, warehousing, and inspection.

During on-site verification, POSCO demonstrated that: [redacted – confidential internal calculation methods]

We reviewed the questionnaire annex, and no other adjustments were identified.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

This information is related to POSCO’s internal calculation and adjustment methods. For this reason, such information is redacted.

**Exceptions/Findings/Adjustments**

None.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

**Conclusions**

The information relating to fair comparison provided POSCO is verifiable. Based on the work performed, we have a reasonable level of assurance that the information can be treated as complete, relevant, and accurate and can therefore be used by the TRA for dumping and injury assessments and for any other purpose within the investigation.

*If you have redacted or removed any information, please provide reasons as to why the information is considered confidential (see [Confidential information](#)):*

## Conclusions

We checked the company details and ownership information submitted by POSCO against audited financial statements and the company website. During on-site verification procedures, these details were discussed and evidenced further, with no issues identified.



During on-site verification, POSCO provided presentations and information regarding its accounting systems and procedures. We viewed a cost and sale transaction from beginning to end through an accounting walk-through, and observed transactions live in the financial system, with no issues identified.

We reviewed PCN allocations and goods in scope for accuracy and consistency. During on-site verification, POSCO provided presentations and demonstrated how PCNs were assigned to the goods in scope, with no issues identified.

We reconciled the information provided in the questionnaire response to audited financial statements and POSCO's accounting system. POSCO demonstrated how it extracted and prepared the data provided in the questionnaire response for both costs and sales. A sample of cost and sales transactions was traced back to source documents, with no issues identified. We assessed and were satisfied with the methodologies used by POSCO to allocate costs to PCNs.

POSCO provided sufficient and appropriate evidence, enabling us to conduct suitable verification work, including on a sample basis as detailed in the above sections.

Based on the work performed, we have a reasonable level of assurance that the information provided in its questionnaire response is complete, relevant, and accurate for the purpose of this investigation.

## Annexes

### Annex 1: Meetings

| Date and duration            | Type of authentication   | Company representatives                                  | TRA representatives  |
|------------------------------|--|--|----------------------|
| System walkthrough – 2 hours | <input checked="" type="checkbox"/> remote<br><input type="checkbox"/> on-site | <b>POSCO</b><br>[Redacted: Personal information removed] | [Redacted: Personal] |



|   |  |   |  |
|---|--|---|--|
| <p>25<br/>September<br/>2025</p>                          |  | <p><b>The International Trade Consulting (ITC)</b><br/>[Redacted: Personal information removed]</p> <p><b>Hogan Lovells</b><br/>[Redacted: Personal information removed]</p>  | <p>information, 5 individuals]</p>                     |
| <p>Verification<br/><br/>19 – 22<br/>January<br/>2026</p> | <p><input type="checkbox"/> remote<br/><input checked="" type="checkbox"/> on-site</p> | <p><b>POSCO</b><br/>[Redacted: Personal information removed]</p> <p><b>The International Trade Consulting (ITC)</b><br/>[Redacted: Personal information removed]</p> <p><b>Hogan Lovells</b><br/>[Redacted: Personal information removed]</p> | <p>[Redacted: Personal information, 6 individuals]</p> |