



Safeguard Questionnaire (Exporter)

Extension Review

Case SE0041: Safeguard Measure on Certain Steel Products

Period of Investigation (POI):	01 April 2018 – 31 March 2023
Deadline for response:	06 November 2023
Case team contact:	SE0041@traderemedies.gov.uk
Completed on behalf of:	Erdemir and its subsidiaries

When you have completed this form, indicate the **confidentiality** status of this document by placing an X in the relevant box below and in the header. We strongly recommend this questionnaire to be completed on the computer, so this step is easy to complete:

Non-Confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **Confidential** and a **Non-Confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **22 October 2023**.



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The scope of this review

Goods subject to review

The goods subject to review in this extension review are detailed in the following table. **‘The goods subject to review’** are goods produced in non-UK countries which are directly competitive with the like goods manufactured in the UK.

Product Number	Product Category	Commodity Codes
1	Non-alloy and other alloy hot-rolled sheet and strip	72081000, 72082500, 72082600, 72082700, 72083600, 72083700, 72083800, 72083900, 72084000, 72085210, 72085299, 72085310, 72085390, 72085400, 72111300, 72111400, 72111900, 72126000, 72251910, 72253010, 72253030, 72253090, 72254015, 72254090, 72261910, 72269120, 72269191, 72269199
2	Non-alloy and other alloy cold-rolled sheet	72091500, 72091690, 72091790, 72091891, 72092500, 72092690, 72092790, 72092890, 72099020, 72099080, 72112320, 72112330, 72112380, 72112900, 72119020, 72119080, 72255020, 72255080, 72262000, 72269200
4	Metallic coated sheet	72102000, 72104100, 72104900, 72106100, 7210690020, 7210690080, 72109080, 72122000, 72123000, 72125020, 72125030, 72125040, 72125061, 72125069, 72125090, 72259100, 72259200, 72259900, 72269910, 72269930, 72269970
5	Organic coated sheet	72107080, 72124080
6	Tin mill products	72091899, 72105000, 72121090, 72101100, 72107010, 72124020, 72101220, 72109040, 72101280, 72121010
7	Non-alloy and other alloy quarto plates	72085120, 72089020, 72254040, 72085191, 72089080, 72254060, 72085198, 72109030, 72085291, 72254012
12A	Alloy merchant bars and light sections	72283020, 72283041, 72283061, 72283069, 72283070, 72283089, 72286020, 72287010
12B	Non-alloy merchant bars and light sections	72143000, 72149110, 72149190, 72149931, 72149939, 72149950, 72149971, 72149979, 72149995, 72159000, 72161000, 72162100, 72162200, 72164010, 72164090, 72165010, 72165091, 72165099, 72169900
13	Rebar	72142000, 72149910
16	Non-alloy and other alloy wire rod	72131000, 72139149, 72271000, 72132000, 72139170, 72272000, 72139110, 72139190, 72279010, 72139120, 72139910, 72279050, 72139141, 72139990, 72279095
17	Angles, shapes, and sections of iron or non-alloy steel	72163110, 72163219, 72163310, 72163190, 72163291, 72163390, 72163211, 72163299
19	Railway material	73021022, 73021028, 73021050
20	Gas pipe	73063041, 73063049, 73063072, 73063077
21	Hollow section	73066110, 73066192, 73066199



25A	Large welded tube (1)	73051100, 73051200
25B	Large welded tube (2)	73051900, 73052000, 73053100, 73053900, 73059000
26	Other welded tube	73061100, 73061900, 73062100, 73062900, 73063012, 73063018, 73063080, 73064020, 73064080, 73065021, 73065029, 73065080, 73066910, 73066990, 73069000

Any reference to the goods subject to review refers to the product categories and commodity codes covered in the table above.

Please refer to the Notice of Initiation on the case file for additional detail regarding the existing safeguard measure.

Like goods

This questionnaire asks for information about the production and sales of goods which are **like** the goods subject to review. Any reference to '**like goods**' in this questionnaire refers to goods which are like the goods subject to review in all respects, or with characteristics closely resembling them, and are produced in all markets including the UK.

Directly competitive goods

'**Directly competitive goods**' are goods produced in the UK which are directly competitive with the goods subject to review.

This can include goods that are not only similar to the goods subject to review, such as a different type or variety, but also include goods that occupy a position of direct competition with the goods subject to review. A directly competitive good may be one that is substitutable with the goods subject to review.

When you are completing this questionnaire, please follow the instructions for each question to provide the appropriate information regarding the like goods, goods subject to review or the directly competitive goods by product category.



Instructions

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry. The TRA has been established to provide the UK with its own independent trade remedies system.

As part of our work, we are carrying out an extension review of the safeguard measure relating to certain steel products.

This extension review will consider whether the expiry of the definitive safeguarding remedy would likely result in a continuation or a recurrence of serious injury to UK producers of the relevant goods.

Why should I take part?

We are asking exporters of certain steel products to complete this questionnaire to inform our review into whether the current safeguard measure should be extended or expire.

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

How do I respond?

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

Please provide all the information requested by **22 October 2023**. We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate such that it is detrimental to the investigation. We may also send a notice requesting clarification or supplementary information if necessary. Therefore, please provide as much detail and evidence 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 or any part of this questionnaire, now or later during the review, please contact the case team at SE0041@traderemedies.gov.uk.

You can also find out more about the regulatory basis of our investigations. The TRA conducts safeguard expiry reviews under regulation 35 of the *Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019/449*.

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire. Please contact the case team directly, using the email address on the cover of this questionnaire, if you have any queries or if you require assistance.

If you think you will not be able to complete the questionnaire within the required time, please contact the case team as soon as possible using the contact details on the cover of this questionnaire. **Due to the restricted timeframe of this extension review, the case team's ability to grant extensions is limited.** You will be required to outline the length of extension and the reasons for it. We will notify you of our decision whether we will grant the requested extension.

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. Please 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 the case team as soon as possible at SE0041@traderemedies.gov.uk.

- Please provide all formulas and calculations used within your questionnaire response so we can rely on your calculations.
- 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., 23/05/2023).
- 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, SE0041, in any correspondence with the TRA.

Preparing confidential and non-confidential versions

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

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



In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If information is confidential, and due to exceptional circumstances, it is incapable of being converted into a confidential format (for example through partial redaction or indexing of figures), please remember to include a statement of reasons. The statement of reasons should be included in the non-confidential submission in place of the confidential information. You should state what the confidential information relates to and explain why it is not possible to delete or redact the answer in a way that would allow for a reasonable understanding of the confidential information (e.g. the data is capable of being reverse engineered, or the whole answer is extremely commercially sensitive).
- 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 circumstances as permitted by regulation 17 of the Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (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, at <https://www.trade-remedies.service.gov.uk/public/case/SE0041/> .

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 goods, goods subject to review and/or the directly competitive goods.

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 exporter of the goods subject to review, they should **also** complete a producer questionnaire. Please make sure you provide your subsidiaries with access to it.



- Where your subsidiaries or associated companies are not exporters but are involved in the sales of the goods subject to review, your questionnaire response should include information from those companies.

If you have any queries about this part of the process, please contact the case team as soon as possible, 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 authenticate the information contained in your responses.

Authenticating the information you supply

The TRA will authenticate, as far as possible, the information provided to it. As part of this process, we may conduct authentication visits. If we need to authenticate 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 authentication.

Authentication visits may be conducted remotely or in person.

Please indicate any dates when you would be unable to host an authentication visit between the start of November 2023 to the end of December 2023.

<i>The condition of ability is confidential by nature.</i>
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Appendix reference:



Once authentication 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, you will need to provide reasons for this.



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:	<i>Erdemir: Ereğli Demir ve Çelik Fab. T.A.Ş. İsdemir: İskenderun Demir ve Çelik A.Ş. Ersem: Erdemir Çelik Servis Merkezi Tic. ve San. A.Ş.</i>
Legal structure (e.g. limited company, sole trader, partnership etc.):	<i>Erdemir: Joint Stock Company İsdemir: Joint Stock Company Ersem: Joint Stock Company</i>
Year of establishment:	<i>Erdemir: 1960 İsdemir: 1970 Ersem: 2001</i>
Other operating names:	<i>Erdemir and its subsidiaries are also denoted as OYAK Mining and Metallurgy Group, which refers to a consolidated group structure as a whole.</i>
Company registration number:	<i>Erdemir: 863037 İsdemir: 1599 Ersem: 6636</i>
Place of registration:	<i>Erdemir: Istanbul İsdemir: Iskenderun Ersem: Gebze</i>
Name (point of contact):	████████████████████
Position:	████████████████████
Address:	<i>Erdemir: Barbaros Mah. Ardıç Sok. No:6 Ataşehir 34746 İstanbul / Türkiye İsdemir: Karşı Mah. Şehit Yüzbaşı Ali Oğuz Bul. No:1 Payas 31900 Hatay / Türkiye Ersem: Gebze OSB 700. Sok. No: 724 Gebze 41400 Kocaeli / Türkiye</i>
Telephone No.:	████████████████████
Email:	████████████████████
Website:	<i>www.oyakmadenmetalurji.com.tr</i>



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

Name:	<i>Not Applicable</i>
Address:	<i>Not Applicable</i>
Telephone No.:	<i>Not Applicable</i>
Email:	<i>Not Applicable</i>
Confirm they have signed authority to act (Yes/No):	<i>Not Applicable</i>
Appendix reference:	

A2 About your company

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

Erdemir: is a joint stock corporation and the largest iron and steel manufacturer in Türkiye, having subsidiaries which are also individual legal entities. Erdemir's shares have been quoted on Istanbul Stock Exchange (Borsa Istanbul A.Ş.-BIST) since the establishment of the BIST in 1986. The company itself is the functional parent company of a group of companies named as OYAK Mining and Metallurgy Companies.

Erdemir produces plates, hot and cold rolled, tin, chromium and zinc coated flat steel and supplies basic inputs to automotive, white goods, pipes and tubes, rolling, manufacturing, electrics-electronics, mechanical engineering, energy, heating equipment, shipbuilding, defense, and packaging industries.

İsdemir: was established in 1970, it is the largest integrated steel production plant in Türkiye. Until 2008 İsdemir was solely a long steel producer. In 2002 İsdemir shares was sold to Erdemir and the first hot rolling mill of İsdemir was erected in 2008. İsdemir produces pig iron, billet, slab, wire rod, hot rolled coil and sheet.

İsdemir Linde Gaz Ortaklığı A.Ş.: In line with İsdemir's goal of meeting the additional industrial gas needs and reducing the costs associated with the existing industrial gas system, the İsdemir Linde Gas Partnership Joint Stock Company was established in a 50% -50% partnership with Linde Gas Türkiye. The company started operations in December 2016.



Ersem: is a steel service center of Erdemir with locations in several cities throughout Türkiye. The main purpose of Ersem is to meet the needs of flat steel product user's demands which differentiate and specialize namely in automotive, white goods and machinery production as cold rolled and galvanized outputs through edge cutting, slitting and length cutting processes, in the shortest terms, matching with customer standards.

Ermaden: is a mining company.

Erdemir Mühendislik: provides a vast range of engineering, project management services and provides integrated solutions with a world-class engineering approach and work for the future with our innovative solutions.

Erdemir-Romania: is an electrical steel (silicon flat steel) producer, located at the city of Targoviste in Romania. The company supplies fully processed non-grain oriented (NGO) electrical steel strips and coils, where products and services aim the manufacturing industries of all electro-technical applications, electrical motors, power transformer and generators.

Erdemir Asia Pacific Pte Ltd (EAPPL): was established in July 2014 and serves as our Group's Asia Pacific regional office.

Erdemir Enerji: is established for the purpose of producing renewable energy.

Kümaş Manyezit: has become a part of the group in 2021. The company is an integrated factory that produces magnesite, dolomite and alumina based refractory bricks and mortars as end products in its brick and mortar facilities. It also supplies sintered magnesite, fused magnesite, fused oxychrome and calcined magnesite derivative products produced from natural magnesite ore.

Yenilikçi Yapı Malzemeleri: is a wholly owned subsidiary of Kümaş which operates as a recycler.

Appendix reference:

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
Not Applicable	No Changes	Not Applicable

3. List and explain all authorisations your company has been required to obtain to produce, sell, or to export the goods subject to review and/or like goods. These may include licences, permits, permissions or mining concessions. Indicate if



your company is subject to any direct or indirect, quantitative, or other, restrictions on any of these activities.

There are no authorisations, except for working permit, environmental licenses and etc. There are no limits, permissions or mining concessions. We are not subject to any direct or indirect, quantitative or any other restrictions. All companies are subject to general regulations and laws of environment, social security, workplace health compliance, hazardous material treatment, tax obligations and etc.

Appendix reference:

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

Please refer to flat and long products' catalog in Appendix-01

Appendix reference: Appendix-01

5. Please describe all the other products (not including the goods subject to review and/or like goods) produced or sold by your company, globally, and in the UK.

Please refer to flat and long products' catalog in Appendix-01

Appendix reference: Appendix-01

6. State whether your company is a member of any representative organisations (e.g. trade bodies, associations, Chambers of Commerce). If so, please provide a copy of the relevant documentation.

Please refer to "Corporate Memberships" on page 116 of 2022 Integrated Report. The document is publicly available online, yet we also submit in appendix.

Appendix reference: Appendix-02

A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) or legal persons (e.g. companies) are associated where they meet the definition of 'Related Persons' in regulation 128 of the *Customs (Import Duty) (EU Exit) Regulations 2018*.



1. Please explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure, all sites/locations and departments which are involved in the production, sales, R&D, supply and distribution of the goods subject to review and/or like goods for domestic and export markets.

Please refer to Appendix-03 which is a confidential document by nature and not amenable to summary.

Appendix reference: *Confidential*

2. Please provide a written summary and a diagram/flow chart, if available, of your production process for the goods subject to review and/or like goods. Clearly indicate the different production stages carried out by your company.

Both Erdemir and its Subsidiary İsdemir are integrated steelmakers, using the BOF (Basic Oxygen Furnace) method.

Appendix reference:

3. Please complete **Annex 1 – Associated companies** for your company's worldwide corporate structure and affiliations.

A4 Board members and principal shareholders

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

Name	Shareholding in company	Name of Other Companies in which person holds interest	Activity of other companies
<i>Company: Erdemir (Integrated Steelmaker)</i>			
<i>Ataer Holding A.Ş.</i>	<i>49.29%</i>		
<i>Treasury Shares (Erdemir's own portfolio, purchased by Erdemir from the BIST)</i>	<i>3.55%</i>		<i>Integrated Steelmaker</i>



<i>Publicly Traded in Istanbul Stock Exchange (BIST)</i>	47.16%		<i>Stock Exchange</i>
Company: İsdemir (Integrated Steelmaker)			
<i>Erdemir</i>	94.87%		<i>Integrated Steelmaker</i>
<i>Publicly Traded in Istanbul Stock Exchange</i>	5.13%		<i>Stock Exchange</i>
Company: Ersem (Steel Service Center)			
<i>Erdemir</i>	100%		<i>Integrated Steelmaker</i>
Company: Ermaden (Mining Company)			
<i>Erdemir</i>	90%		<i>Integrated Steelmaker</i>
<i>Kardemir</i>	10%		<i>Integrated Steelmaker</i>

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

Name	Position on Board of Directors	Name of Other Companies in which person holds interest	Activity of other companies
<i>Erdemir Board (Ereğli Demir ve Çelik Fab. T.A.Ş.)</i>			
<i>OYTAŞ İç ve Dış Ticaret A.Ş.</i>	<i>Chairman</i>	██████████	██████████
<i>OMSAN Lojistik A.Ş.</i>	<i>Deputy Chairman and Executive Director</i>	██████████	██████████
<i>OYAK Pazarlama Hiz. ve Turizm A.Ş.</i>	<i>Member and Executive Director</i>	██████████	██████████
<i>Turkish Privatization Administration</i>	<i>Member</i>	██████████	██████████
<i>OYAK Denizcilik ve Liman İşlet. A.Ş.</i>	<i>Member</i>	██████████	██████████
<i>OYKA Kağıt Ambalaj San. ve Tic. A.Ş.</i>	<i>Member</i>	██████████	██████████



<i>Ali FİDAN</i>	<i>Independent Member</i>	██████████	██████████
<i>Kurtuluş Bedri VAROĞLU</i>	<i>Independent Member</i>	██████████	██████████
<i>Emre GÖLTEPE</i>	<i>Independent Member</i>	██████████	██████████
<i>İsdemir Board (İskenderun Demir ve Çelik A.Ş.)</i>			
<i>Ataer Holding A.Ş.</i>	<i>Chairman</i>	██████████	██████████
<i>Erdemir Çelik Servis Merkezi San. ve Tic. A.Ş.</i>	<i>Deputy Chairman and Executive Director</i>	██████████	██████████
<i>Erdemir Madencilik San. ve Tic. A.Ş.</i>	<i>Member and Executive Director</i>	██████████	██████████
<i>OYAK Pazarlama Hiz. ve Turizm A.Ş.</i>	<i>Member</i>	██████████	██████████
<i>Erdemir Mühendislik, Yönetim ve Danışmanlık Hizmetleri A.Ş.</i>	<i>Member</i>	██████████	██████████
<i>Turkish Privatization Administration</i>	<i>Member</i>	██████████	██████████
<i>Ali FİDAN</i>	<i>Independent Member</i>	██████████	██████████
<i>Kadri ÖZGÜNEŞ</i>	<i>Independent Member</i>	██████████	██████████
<i>Emre GÖLTEPE</i>	<i>Independent Member</i>	██████████	██████████
<i>Ersem Board (Erdemir Çelik Servis Merkezi San. ve Tic. A.Ş.)</i>			
<i>Ataer Holding A.Ş.</i>	<i>Chairman</i>	██████████	██████████
<i>OMSAN Lojistik A.Ş.</i>	<i>Deputy Chairman</i>	██████████	██████████
<i>OYAK Denizcilik ve Liman İşlet. A.Ş.</i>	<i>Member</i>	██████████	██████████
<i>İskenderun Demir ve Çelik A.Ş.</i>	<i>Member</i>	██████████	██████████
<i>Erdemir Mühendislik, Yönetim ve Danışmanlık Hizmetleri A.Ş.</i>	<i>Member</i>	██████████	██████████
<i>Erdemir Madencilik San. ve Tic. A.Ş.</i>	<i>Member</i>	██████████	██████████
<i>Ermaden Board (Erdemir Madencilik San. ve Tic. A.Ş.)</i>			



Records address	What records are held?
<i>All records are kept digitally. However, statutory physical copies are also kept in company headquarters or branches at different cities, such as [REDACTED], [REDACTED], [REDACTED], [REDACTED].</i>	<i>Digital copies of all documents are recorded and stored. Physical copies of some stored information are required to be kept for a certain amount of period by law, except for the documents subject to approved electronic-filing system.</i>

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 POI (01 April 2018 – 31 March 2023), please describe these changes.

Financial year is from 01 January to 31 December. There have been no changes in financial practices, since 01 April 2018.

Appendix reference:

3. For your company and any associated parties involved in the production, marketing or sales of your goods, please attach a copy of the annual reports, including the financial statements and audit report covering the POI (01 April 2018 – 31 March 2023).

You may evaluate integrated annual reports of Erdemir and its subsidiaries (also denoted as OYAK Mining and Metallurgy Companies) since 2010, by referring to the link below:

<www.oyakmadenmetalurji.com.tr/homepage#/investor-relations/annual-reports>

Please note that all reports include independently audited financial statements. The reports disclose information on cost of production, income statements, profit and loss statements, budget statements, and etc.

Integrated annual reports releases quite detailed information on management approaches of OMM Companies (Erdemir and its subsidiaries) in the economic, social and environmental sphere and their performance data. The report combines financial and non-financial data, shares assessments of the long-term value creation business strategy of OMM Companies, their corporate culture, stakeholder relations, and how the Companies manage opportunities and risks.

Appendix reference:



4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the POI (01 April 2018 – 31 March 2023).

Our accounts are independently audited. For more details, please refer to the question above.

Appendix reference:

5. Please attach a copy of your company’s trial balance in spreadsheet form for all statutory period ends which occur during the POI. If for example, your statutory period end is 31 December, then trial balances should be provided as follows:

- 01 January 2018 - 31 December 2018
- 01 April 2018 – 31 March 2019
- 01 January 2019 - 31 December 2019
- 01 April 2019 – 31 March 2020
- 01 January 2020 - 31 December 2020
- 01 April 2020 – 31 March 2021
- 01 January 2021 - 31 December 2021
- 01 April 2021 – 31 March 2022
- 01 January 2022 - 31 December 2022
- 01 April 2022 – 31 March 2023

NB: We will be using trial balances and management accounts (see question 6) to reconcile total sales and purchases as per your financial statements to those disclosed in the questionnaire annex.

Please refer to the link provided in reply to question 3.

Appendix reference:

6. For your company and any associated parties involved in the production, marketing or sales of the like goods, the goods subject to review, or directly competitive goods please attach copies of relevant management reports (e.g. management accounts including a profit or loss statement) for the profit centres that includes the like goods or goods subject to review. Please provide these reports to cover the full range of periods set out in question 5.

Please refer to financial statements.

Appendix reference:



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

Consolidated financial statements of Erdemir and its subsidiaries for the financial year 2022 is provided within the annual report. Please refer to question 3 for more details.

Appendix reference: Appendix-02

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

Financial accounting system is integrated in [SAP] ERP software. This accounting package is an integrated system that includes general ledger, financing, accounts payable, and accounts receivable functions. Physical copies of stored information are required to be kept for a certain amount of period by law, except for the documents subject to approved electronic-filing system.

Foreign currency transactions are recorded at the rates of exchange prevailing on the dates of the transactions. Assets and liabilities denominated in foreign currencies are converted at the exchange rates prevailing on the balance sheet date.

For the cost sheets, please refer to 2022 audited financial report's Note 25 on Sales and Cost of Sales.

For more information, please refer to financial statements.

Appendix reference:

9. Please describe your policy for currency conversion, with reference to your UK sales. How do your financial systems convert currencies and what rates do they use? Please provide the rates that you have used to convert to or from £ GBP during the POI.

All our financial record is in US Dollar. These figures were converted from USD to GBP.

Appendix reference:



10. Have you changed your financial policies during the POI? If so, please explain the changes, including dates and the reasons for those changes along with the impact of those changes relating to the goods subject to review and/or like goods.

No, we did not change our financial policies during the POI.

Appendix reference:



SECTION B: About your goods

B1 Understanding your goods subject to review and/or like goods

The goods subject to review in this extension review are defined in 'the scope of this review'.

1. Please complete **Annex 2 – Product comparison**. If your company manufactures a range of Like and/or goods subject to review, list this information for each individual make and model in the range.
2. Please explain the internal coding system your company uses to classify your range of the goods subject to review and/or like goods. If your company uses multiple internal reference codes across departments, cross reference each one. Please provide, or attach, a guide setting out the product codes that you use.

Please refer to Appendix-01

Appendix reference: Appendix-01

3. Please provide details of your goods subject to review and/or like goods, regarding their production processes, interchangeability, raw materials used, degree of model differentiation channels of distribution and sale, pricing and other relevant characteristics.

Please refer to Appendix-01 for any detail regarding our goods. Pricing of materials are remunerated upon market conditions, but always above the cost of production with an adequate profit to allow shareholders to benefit dividends.

4. Indicate in the box below any physical, commercial or functional differences between your products and the like goods / goods subject to review produced in the UK. If these differences cause distinguishable variations in price, explain those differences and the effect they have. Attach any evidence you have that is relevant.

Both U.K. producers and other producers may produce similar goods.

Appendix reference:

5. If there are differences in characteristics within your range of goods subject to review and/or like goods which cause distinguishable differences in price when



compared to comparative goods produced by others, explain those differences and the effect they have. Please attach any relevant evidence. This could take the form of sales brochures, input costs or research papers.

Both U.K. producers and other producers may produce similar goods.

Appendix reference:

6. Where possible, provide estimations of how prices of the like goods and/or directly competitive goods produced in the UK compare to each of your similar goods and reasons for the price differences. In the box below, describe how you established the differences and substantiate with evidence.

Technical documentation (such as sales catalogues, safety standards, technical data, etc.) should be attached for each product category where available.

We shall underline the fact that a safeguard investigation relies on the injury of the domestic producers, due to unexpected increase of imports, in terms of quantity, where the price is not a matter of focus. Pricing becomes an important factor in countervailing duty or anti-dumping investigations.

Appendix reference:

7. How does your company price the goods subject to review produced by your company? Provide this information for each of the goods subject to review produced by your company and substantiate with evidence.

We determine the price based on market conditions. However, our corporate policy is to sell within well satisfactory profit margins in the domestic market. With respect to export markets, we always sell with a price that is higher and more profitable than the Turkish domestic market.

Appendix reference:

8. How does your company sell the goods subject to review (e.g. to resellers, directly to consumers, as part of a bidding process)? Are you aware of whether similar methods are used for the goods subject to review and like goods? Substantiate with evidence.

We sell goods to resellers and consumers both.

Appendix reference:

B2 Understanding the UK market

Please answer the questions in this section and provide reasoning if you are able. Answers should refer to the relevant product categories.



1. Please provide a general description of the nature of competition within the overall UK market for the goods subject to review, the like goods and/or directly competitive goods.

<i>Our opinions regarding UK market are presented in Appendix-04.</i>

Appendix reference: Appendix-04

2. Please explain the end use of the goods subject to review, the like goods and/or goods subject to review. If there are multiple uses for the like goods and/or goods subject to review, list them and, where possible, estimate what proportion of your sales goes to each.

<i>Please refer to Appendix-04.</i>

Appendix reference: Appendix-04

3. How price-sensitive is demand for the goods subject to review, like goods and/or directly competitive goods, in the UK or globally? To what extent does demand change in response to changes in price?

<i>We have no comment.</i>

Appendix reference:

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

<i>We have no comment.</i>

Appendix reference:

5. Please describe the degree of competition between the goods subject to review and the like produced in the UK market.

<i>We have no comment.</i>

Appendix reference:

6. Please describe the current state and forecasts of the UK and world markets for the like goods produced in the UK and the like or goods subject to review. Please substantiate your comments with any documents, such as studies or articles in trade journals, that support your statement.

<i>Please refer to Appendix-04.</i>

Appendix reference: Appendix-04



7. Please use the box below to provide any other information about the UK market for the goods subject to review, like good and/or directly competitive goods that may be relevant for this review.

Please refer to Appendix-04.

Appendix reference: Appendix-04



SECTION C: Costs and production

C1 Cost to make and sell

1. Please Complete **Annex 3 – Cost to make and sell** with details of your costs for the final year of the POI (01 April 2022 – 31 March 2023), for your total goods and for the total goods subject to review or like goods produced in the POI.
2. If your company is vertically integrated or some of the production inputs (e.g. raw materials, energy) of your goods subject to review and/or like goods are produced by an associated party, please provide details of this arrangement, and attach documentation demonstrating any agreements you have.

We are unable to provide information.

Appendix reference:

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

We are unable to provide information.

Appendix reference:

C2 Cost reconciliation

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

C3 Production process

5. Please provide a written summary and a diagram/flow of your production process clearly indicating the different production stages completed by your company for the goods subject to review and/or like goods.

Please refer to Section A3 Question 2.

Appendix reference:

6. Identify where each part of your production process takes place and explain at what stage the most value is added to your goods subject to review and/or like



goods in the production process. Please describe the manufacturing process of the like goods and/or directly competitive goods, its level of complexity and the investment of capital involved. If a production process is carried out within the UK, please explain the nature of the activity and where this process step takes place.

<i>We are unable to provide information.</i>
Appendix reference:

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

Company name	Physical address
<i>Not Applicable</i>	<i>Not Applicable</i>
Appendix reference:	

+Add additional rows as required

C5 Raw material (RM) and major input purchases

1. What are the essential raw materials, or other inputs, related to your production of the goods subject to review and/or like goods? Please explain and provide an invoice and supporting documentation (e.g. a delivery note, payment confirmation etc.) for two different raw material or other input purchases.

<i>As indicated before, Erdemir and its subsidiary İsdemir are both integrated steelmakers, which use BOF (Basic Oxygen Furnace) to produce steel. During the process, the main inputs are: ferrous raw materials, steel scrap, metallurgical coke, coal, energy, industrial gasses, alloy raw materials, auxiliary raw materials</i>
Appendix reference:



SECTION D: Sales

D1 Sales reconciliation

1. Please complete the sales reconciliation table in **Annex 5 – Sales**
2. Additionally, please complete the sales forecast table in **Annex 5 – Sales** providing quantitative estimates (e.g. projections or forecasts) for the sales revenue and quantity of goods subject to review and/or like goods, and for all other goods you produce, for the next five years.

D2 Stocks

1. Please complete **Annex 6 – Stocks**.
2. Please describe any significant changes in Stock levels during the POI (01 April 2018 – 31 March 2023) and explain why these stock changes occurred. Where possible, please provide supporting evidence.

	Appendix reference:

D3 Forward sales contracts

1. Do you have any forward sales contracts? Please complete **Annex 7 – Forward Sales Contracts**. Please explain the nature of these obligations and how the contracts are agreed.

	Appendix reference:

2. Would your forward sales contracts be affected if the existing safeguard measure on the goods subject to review were:
 - i) extended; or
 - ii) expired?

Please describe the nature of any changes and substantiate with evidence.

--	--



Appendix reference:

3. Please attach two examples of forward sales contracts if relevant.

[Redacted]
Appendix reference:

D4 Distribution channels and price setting

1. If applicable, please provide copies of price lists for the goods subject to review and/or like goods for the final year of the POI (01 April 2022 - 31 March 2023).

Please refer to Appendix-01
Appendix reference:

2. If any price reductions have been applied to any of your sales of goods subject to review and/or like goods during the POI (01 April 2018 – 31 March 2023), please provide a description. This includes discounts, rebates, credit terms, allowances and commissions.

- Explain the terms and conditions that must be met for any price reduction.
- Indicate any price reduction not included in an invoice price. Explain how the invoice price and the price reduction have been calculated.

Not applicable, there were no price reductions in any of our sales of goods subject to review and/or like goods during the POI.
Appendix reference:

3. Please provide details of any distribution network for the goods subject to review and/or like goods if you have one.

[Redacted]
Appendix reference:

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

[Redacted]
Appendix reference:



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

Appendix reference:

6. Please attach sales contracts for the top two customers by volume that you have sold goods subject to review and/or like goods to during the final year of the POI (01 April 2022 – 31 March 2023).

Appendix reference:

7. Please attach sales contracts for the top two customers by volume that you have sold goods subject to review and/or like goods to during the final year of the POI (01 April 2022 – 31 March 2023).

Appendix reference:

8. Please select examples of export sales to the UK of goods subject to review and/or like goods of two different products/models to different customers. Attach as an appendix a complete set of documentation for these sales. Where possible, include purchase orders, commercial invoices, order acceptances, discounts or rebates, credit and debit notes, contracts of sale, freight and insurance details, bank documentation and all other relevant documents.

Appendix reference:

9. Please select examples of export sales of goods subject to review and/or like goods of two different products/models to different customers included. Attach as an appendix a complete set of documentation for these sales. Where possible, include purchase orders, commercial invoices, order acceptances, discounts or rebates, credit and debit notes, contracts of sale, freight and insurance details, bank documentation and all other relevant documents.

Appendix reference:



D5 Captive use

1. For products classified for internal use in **Annex 2 - Product Comparison** please specify how these goods are/were used.

Appendix reference:

2. Please comment on whether your internal use of the goods subject to review and/or like goods would be affected if the existing safeguard measure no longer applied. Please attach evidence to support your answer where possible.

Appendix reference:



SECTION E: UK imports

E1 Imports

1. Please comment on how total UK imports of the goods subject to review have developed during the POI (01 April 2018 – 31 March 2023).

Our opinions regarding UK market are presented in Appendix-04.

Appendix reference:

2. Please submit any available information concerning global export capacities, both currently, and for the foreseeable future. Please substantiate any claims with evidence, where possible.

Our opinions regarding UK market are presented in Appendix-04.

Appendix reference:

3. Please comment on the likelihood of trade diversion to the UK if the existing safeguard measure were to be removed. What impact, if any, would you expect trade measures, safeguards measures or other forms of trade control in third-country markets (e.g. the US Section 232 measures and the EU safeguard measure) to have on the UK market?

Please substantiate any claims of likelihood with evidence.

We do not foresee any likelihood of trade diversion to the UK if the existing safeguard measure were to be removed.

Appendix reference:

4. Please comment on the likelihood of the recurrence of an increase in imports of the goods subject to review if the existing safeguard measure were:
- i) extended; or
 - ii) expired.

Please substantiate with evidence.

We do not foresee any likelihood of the recurrence of an increase in imports.

Appendix reference:



SECTION F: Serious injury

F1 Serious injury

1. What has been the impact of the current safeguard measure on the UK? Has the current measure affected UK producers of like goods, upstream suppliers or downstream users, and if so, how?

We believe that the scope of safeguard measure is too extensive, thus such an extensive scope does not serve in the best interest of UK either. We are in the opinion that protectionist trade policies is likely to jeopardise the prosperity of British consumers.

Appendix reference:

2. What do you think the effect of maintaining or removing this measure would be? If possible, please comment in relation to UK production and sales.

*The effect of maintaining this measure would be pure trade protectionism, which will increase the cost of production for UK industries.
The effect of removing this measure would contribute UK industries and steel consumers.*

Appendix reference:

3. Has injury to the UK industry been removed, or reduced, in whole or in part due to the application of the definitive safeguarding remedy? Injury means a significant overall impairment to your position or the threat of such impairment. Please provide comments in the boxes below and substantiate with evidence.

Yes, injury to the UK industry been completely removed. Indeed, there were no genuine injury at all. We would like re-stress the fact that the safeguard measure was not introduced in line with the UK's own needs and interests. The measure was a manifestation of the protectionist policies of the European Union (EU). In our opinion, insisting on this protectionist trade policy, which has been adopted by the UK following the Brexit process, will neither be compatible with the principle of global free trade nor benefit the UK's exclusive economic interests.

Appendix reference:

4. Would the UK industry suffer from serious injury if the existing safeguard measure on the goods subject to review was:
 - i) extended or
 - ii) expired?



If so, please describe the nature and the degree of the injury and provide supporting evidence. Please note that we are considering the following factors as injury indicators:

1. Production and production capacity
2. Employment
3. Productivity
4. Profitability
5. Return on Investment
6. Investment and ability to raise capital
7. Stock and Inventory amounts
8. Cash flow
9. Any other relevant indicator raised by interested parties

<i>We do not believe that UK steel industry will suffer from any injury if the existing safeguard measure removed. If UK steel industry were to suffer injury, that would be due to other financial or operational reasons.</i>

Appendix reference:

5. Do the circumstances of UK producers, or domestic or overseas market conditions, affect the likelihood that serious injury to the UK industry caused by the importation of the goods subject to review in increased quantities is likely to recur?

<i>We do not believe that any injury to the UK industry was caused by the importation of the goods subject to review; let alone due to increased quantities.</i>
--

Appendix reference:

F2 Liberalisation Rate

1. Do you have any comment to make on the current rate of liberalisation of the safeguard measure? Do you think it should be varied? If so, please describe why and how.

<i>We believe that UK consumers shall be relieved from cost increasing measures for good.</i>

Appendix reference:



SECTION G: Causation

G1 Other causation factors

1. Please comment on any other factors, separate from any current or potential increase in imports of the goods subject to review, that may have caused serious injury or threaten to cause serious injury to the UK industry. This may include:
 - UK demand for the like goods and/or directly competitive goods;
 - the overall situation on the world market of the like goods and/or directly competitive goods produced by the UK industry and the demand for UK exports;
 - the competitiveness of the UK industry (including quality, efficiency and performances of your production lines);
 - the reasons and consequences of any reductions in exports made by the UK industry to other markets.

This list is non-exhaustive. Please add any additional relevant information explaining the current and potential future state of the UK industry and substantiate your response with evidence.

<i>We have no further comments on the matter that is additional to Appendix-04.</i>

Appendix reference:



SECTION H: Economic interest

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

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

The questions in this section will contribute to this assessment. Please provide information specific to geographic regions of the UK where possible.

H1 Potential Impacts of a measure

1. Please describe how you would expect a decrease in the import prices of the goods subject to review to affect each of the following. Where possible, please **specify your answers by relevant product categories** and support your claims with evidence.

- Domestic prices of like goods and/or directly competitive goods in the UK;

We have no further comments on the matter that is additional to Appendix-04.

Appendix reference:

- Total UK production of like goods and/or directly competitive goods;

We have no further comments on the matter that is additional to Appendix-04.

Appendix reference:

- Total imports of the goods subject to review to the UK; and

We have no further comments on the matter that is additional to Appendix-04.

Appendix reference:



- Total exports of like goods and/or directly competitive goods from the UK.

We have no further comments on the matter that is additional to Appendix-04.

Appendix reference:

2. Do you know of any related industries that would be affected if the existing safeguard measure expired? Where possible, please **specify your answers by relevant product categories.**

Please consider in particular:

- Upstream industries – those who produce inputs (such as raw materials) needed for the production of the like goods, directly competitive goods and/or goods subject to review;

We have no further comments on the matter that is additional to Appendix-04.

Appendix reference:

- Downstream industries – those who purchase the like goods, directly competitive goods and/or goods subject to review;

We have no further comments on the matter that is additional to Appendix-04.

Appendix reference:

- Industries for complimentary goods – those which would typically be bought alongside the like goods, directly competitive goods and/or goods subject to review (such as ink being bought with printers);

We have no further comments on the matter that is additional to Appendix-04.

Appendix reference:

- Any other industries not covered by the previous categories.

We have no further comments on the matter that is additional to Appendix-04.

Appendix reference:

3. To what extent would you expect any changes in prices of goods subject to review to be passed onto end-users in the UK? Please support your answer with evidence.

We have no further comments on the matter that is additional to Appendix-04.

Appendix reference:



4. If applicable, Would your plans for investment or expansion in the UK steel industry change over the next five years be affected if the existing safeguard measure expires? Please support your claims with evidence.

Not applicable, we have no plans for investment or expansion in the UK steel industry.

Appendix reference:

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

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

Please provide any relevant information about whether any of these groups or any other particular group might be disproportionately affected if the existing safeguard measure expired.

We have no further comments on the matter that is additional to Appendix-04.

Appendix reference:

13. How would the number or range of suppliers be affected if the existing safeguard measure expired? Where possible, please **specify your answers by relevant product categories** and provide supporting evidence.

We have no further comments on the matter that is additional to Appendix-04.

Appendix reference:

14. How would the suppliers' ability to differentiate their products by price, quality, service or innovation in the UK market be affected if the existing safeguard



measure expired? Where possible, please **specify your answers by relevant product categories** and provide supporting evidence.

<i>We have no further comments on the matter that is additional to Appendix-04.</i>
Appendix reference:

15. How would the cost of switching between suppliers be affected if the existing safeguard measure expired? Where possible, please **specify your answers by relevant product categories** and provide supporting evidence.

<i>We have no further comments on the matter that is additional to Appendix-04.</i>
Appendix reference:

16. How would the suppliers' ability to set agreed prices between themselves or for certain customers or products be affected if the existing safeguard measure was expired? Where possible, please **specify your answers by relevant product categories** and provide supporting evidence.

<i>We have no further comments on the matter that is additional to Appendix-04.</i>
Appendix reference:

17. How would the choices available to downstream businesses or end-users be affected if the existing safeguard measure expired? Where possible, please **specify your answers by relevant product categories** and provide supporting evidence.

<i>We have no further comments on the matter that is additional to Appendix-04.</i>
Appendix reference:

18. How would the ability of downstream businesses or end-users to make informed decisions be affected if the existing safeguard measure expired? Where possible, please **specify your answers by relevant product categories** and provide supporting evidence.

<i>We have no further comments on the matter that is additional to Appendix-04.</i>
Appendix reference:

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

<i>We have no further comments on the matter that is additional to Appendix-04.</i>
Appendix reference:



SECTION I: Next steps

Next steps

The questionnaire, spreadsheet annex and any appendices should be submitted through the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **22 October 2023**. The checklist in Section J of this questionnaire may help ensure your submission is complete.

A confidential and non-confidential version of the questionnaire and related annex must be submitted. You can find guidance on how to complete confidential and non-confidential versions at <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/the-tras-investigation-process#questionnaires-and-information-gathering>.



SECTION J: Checklist and appendices

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

Appendix reference	Document title
Appendix-01	Flat Products Catalog and Long Products Catalog
Appendix-02	2022 Integrated Annual Report of Erdemir and its Subsidiaries
Appendix-03	Organizational Structure of Erdemir (Confidential by nature and not amenable to Summary)
Appendix-04	Outlook to UK Market (Confidential, Non-Confidential Summary is Provided)

+Add additional rows as required