



## Anti-Dumping Questionnaire (Producer) Case AD0086: Rutile titanium dioxide exported from People's Republic of China

Period of Investigation (POI):	<input type="text" value="1 January 2025 – 31 December 2025"/>
Injury period:	<input type="text" value="1 January 2022 – 31 December 2025"/>
Deadline for response:	<input type="text" value="2 April 2026"/>
Contact details:	<input type="text" value="AD0086@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="Tronox Pigment UK Limited"/>

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

- Confidential  
 Non-Confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)) by **2 April 2026**.



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## List of abbreviations

AS&G	Administrative, Sales & General
CIF	Cost, Insurance, and Freight
CN code(s)	Combined Nomenclature codes
CTM	Cost To Make
COGS	Cost of Goods Sold.
EBIDTA	Earnings Before Interest, Depreciation Tax and Amortization
EBT	Earnings Before Tax
EIT	Economic Interest Test
FIE	Foreign-Invested Enterprises
FIFO	First in first out
FOB	Free on Board
FTE	Full-Time Equivalents
GAAP	Generally accepted accounting principles
GMP	Good Manufacturing Practices
IATF	International Automotive Task Force
IFRS	International Financial Reporting Standards
ISO	International Organization for Standardization
IP	Injury period
LIFO	Last in first out
LLP	Limited Liability Partnership
PBT	Profit Before Tax
PCN	Product Control Numbers
PMS	Particular Market Situation
POI	Period of Investigation
PSED	Public Sector Equality Duty
ROI	Return on Investment
RM	Raw material
R&D	Research & Development
SEZ	Special Economic Zone
SIE	State-Invested Enterprises
SOEs	State-Owned Enterprises
SOFP	Statement of Financial Position
SOPL	Statement of profit or loss
T by T	Transaction by Transaction
TRA	Trade Remedies Authority
VAT	Value Added Tax
WTO	World Trade Organisation



## 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 rutile titanium dioxide from the People's Republic of China (PRC) is 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 domestic producers 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.

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 **2<sup>nd</sup> April 2026**. 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 [AD0086@traderemedies.gov.uk](mailto:AD0086@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 annex, 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 annex as requested. 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 recoverable tax unless otherwise stated.
- Please refer to the case number, [AD0086@traderemedies.gov.uk](mailto:AD0086@traderemedies.gov.uk) , 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 annex by the due date. This is so that we can publish the non-confidential version of your information on our public file. **Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.**

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

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential (e.g., the data is commercially sensitive).



- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If you do not provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019*) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on [www.trade-remedies.service.gov.uk/public/cases](http://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 a UK producer of like goods, they should **also** complete a Producer questionnaire. Please make sure you provide your subsidiaries with access to it.
- Where your subsidiaries or associated companies are not producers but are involved in the sales of the like goods, your questionnaire response should include information from those companies.

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

## What happens next

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



Following this:

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

## Verifying the information you supply

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

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

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

In some circumstances verification visits may be conducted remotely.

Please indicate any dates when you would be unable to host a week-long verification visit between 25 May and 26 June.

<i>1-5 and 11-12 June 2026.</i>
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Appendix reference: N/A
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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 **rutile titanium dioxide** exported from **the PRC**, described as:

Rutile titanium oxides in pigments and preparations based on rutile titanium dioxide, containing a minimum of 80% by weight of titanium dioxide calculated on the dry matter and having all types of particle sizes, classified under Chemical Abstracts Service Registry Numbers 12065-65-5 and 13463-67-7.

These goods concerned are currently subject to the following commodity codes

- 2823 0000 10
- 2823 0000 30
- 2823 0000 80
- 2823 0000 83
- 3206 1100 10
- 3206 1100 30
- 3206 1100 80
- 3206 1100 85

These codes are only given for information.

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

This questionnaire asks for information about your company's production and sales of goods which are **like** the goods concerned. Any reference to '**like goods**' in this questionnaire refers to goods produced in the UK or imported to the UK from a country other than the PRC 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 or goods concerned. Instructions relating to the completion of the annexes can be found within the relevant annex.**



## 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.

Field description	Product properties	PCN value
Production method	Produced using sulphate method	S
	Produced using chloride method	C
Rutile titanium dioxide content per weight, calculated on the dry matter	>80 to 98%	800
	>98 to 99.5%	980
	>99.5%	995

**For example, a product produced using the chloride method with a 99.0% rutile titanium dioxide content per weight would have the code: C980**

On original issuance of this questionnaire the PCN remains subject to change on the basis of any potential submissions from other interested parties to the investigation. Should the PCN be amended the TRA will inform all producers known to the TRA of this change and a note will be made on the public file. The TRA will require that all submissions are made in line with the final updated PCN.

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

*N/A. See Section B.3 of the Registration Form.*

2. Please comment on the suitability of the PCN structure regarding 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.



*The PCNs are adequate and appropriate to categorize the goods produced, exported and/or imported by Tronox. See **Section A.3.6** of the Application and **Section B.3** of the Registration Form.*

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

*N/A. See **Section B.3** of the Registration Form.*



## 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>Tronox Pigment UK Limited (“Tronox”)</i>
Legal structure (e.g. public limited company):	<i>Private limited company</i>
Year of establishment:	<i>1920</i>
Other operating names:	<i>Tronox</i>
Company registration number:	<i>00162303</i>
Place of registration:	<i>England and Wales</i>
Name (point of contact):	<i>[Sensitive information redacted – Personal data]</i>
Position:	<i>[Sensitive information redacted – Personal data]</i>
Address:	<i>Laporte Road, Grimsby, DN402PR, NE Lincolnshire</i>
Telephone No:	<i>[Sensitive information redacted – Personal data]</i>
Email:	<i>[Sensitive information redacted – Personal data]</i>
Website:	<i>www.tronox.com</i>

### A2 About your company

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

*See Section A.1 of the Registration Form. Tronox is a UK producer of the like goods. Tronox sells the like goods on the UK market, exports the like goods from the UK market, and imports the like goods produced by related entities into the UK.*

Appendix reference: N/A

2. If your company both produces and imports goods concerned and/or like goods, provide approximate proportions of these goods sold in the UK market that you have domestically produced and those that you imported during the Period of Investigation (POI).



See **Annex 6**. The imported Rutile TiO<sub>2</sub> (all produced by related companies) that Tronox sold on the UK market accounted for approximately [8-12]% of Tronox's UK sales. The remaining Rutile TiO<sub>2</sub> that Tronox sold on the UK market was produced by Tronox.

Appendix reference: N/A

3. Please provide details of any changes in the legal form of your business over the past 10 years, for example, mergers, acquisitions and/or sales.

Date	Legal form	Explanation of change
4/9/1984	Private company	Name change pursuant to acquisition by SCM Chemicals
6/3/1997	Private company	Name Change pursuant to acquisition by Millennium Inorganic Chemicals
20/9/2012	Private company	Name change pursuant to acquisition by Cristal Pigments
24/7/2019	Private company	Name change pursuant to acquisition by Tronox

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

*[Sensitive information redacted – Tronox's business operations]*

*Following the EU Withdrawal Act, the Best Available Technique (BAT) requirements and EU BREF's continue to apply within the UK. All permits and installations are subject to and incorporate the BREF and BAT for chemical industries. Accordingly, there are quantitative and other restrictions placed on Tronox in the manufacture of the goods, including:*

- BAT 1 – the implementation of comprehensive environmental and chemical management systems detailing (i) procedures for environmentally critical operations (ii) chemical management plans for inventory, risk assessment and safe handling), (iii) identification of emission sources and associated mitigation plans.*
- BAT 2 – Tronox must maintain a complete inventory of emissions (air, water, fugitive) to enable proper monitoring and control with exceedances beyond the permit limits being reportable and subject to EA investigation and penalties.*

*The BAT additionally requires process design and energy optimisation while minimising waste.*

Appendix reference: N/A



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

*Tronox subscribes to and complies with a number of international production and quality standards including the following:*

- *ISO Standards:*
  - *ISO45001/2018*
  - *ISO14001/2015*
  - *ISO9001/2015*
  - *ISO5001/2018*
- *Accuris ASME API Standards. For the individual standards used, see highlighted items in Appendix A2.5.1.*
- *British Standards Online Subscription. For the individual standards used, see highlighted items in Appendix A2.5.2.*

Appendix reference: A2.5.1 – Accuris;  
A2.5.2 – British Standards

6. State whether your company is a member of any representative organisations. If so, provide a copy of the relevant documentation.

*Tronox is a member of the Chemicals Industry Association and an affiliate member of the Titanium Dioxide Industry Consortium (EU), the Titanium Dioxide Industry Consortium (UK) and the Titanium Dioxide Manufacturers' Association. See **Section A1.3** of the Registration Form.*

*Tronox is also an associate member of the British Coatings Federation.<sup>1</sup>*

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) 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*.

<sup>1</sup> See *British Coatings Federation, Directory of members*, <https://coatings.org.uk/search/custom.asp?id=6774>.



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

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

2. If your company is part of a group (e.g. parent company with subsidiaries, joint-ventures, common ownership), can you:
  - a. Provide a diagram showing the complete ownership structure. [Note: the diagram of corporate structure should be for the company's ultimate parent company].

List all related companies involved in the production or sale of the like goods and a description of the functions performed by each company within the organisation; and Specify which company within the group owns the production facility(ies)?

See **Annex 1**. The org chart for Tronox Holdings plc (“**Tronox Group**”) is enclosed. See also **Section B.1** of the Application.

Appendix reference: A3.1 – Tronox org chart

3. Provide the following:
  - a. List all production and department's locations and addresses (including town/city and county) involved in the production of the like goods for domestic and export markets.
  - b. Locations where the like goods are supplied, distributed or sold for both domestic and export markets.
  - c. State if any of the production locations closed during the injury period. If your company permanently or temporary closed or disposed of any facilities or assets affecting your production of the like goods during the POI, indicate the date, location and reasons for such an action and whether it resulted in any job losses.

See **Section B.1** of the Application. Tronox did not close any production locations in the UK during the injury period.

Appendix reference: N/A

## A4 Board members and principal shareholders

1. Is your company or parent company listed on the stock exchange?

If yes, provide the name of the stock exchange where it is listed, the stock code and date of listing.



*Yes. Tronox Holdings plc (the ultimate holding company of the group) is listed on the New York Stock Exchange trading under the ticker TROX.*

*See Section B.1 of the Application.*

Appendix reference: N/A

2. Please complete the **Owners and shareholders** tab in the **Annex** for:
  - a. All your company's shareholders that owned more than 5% of the company's shares during the POI,
  - b. A list of your current board of directors.

*See Annex 1. Tronox is wholly owned by Tronox Holdings plc.*

*Tronox Group's Board of Directors consists of:*

1. *Ilan Kaufthal, Chairman of the Board*
2. *John D. Romano, Chief Executive Officer*
3. *Jean-François Turgeon, Director*
4. *Peter Johnston, Director*
5. *Ginger Jones, Director*
6. *Sipho Nkosi, Director*
7. *Lucrece Foufopoulos-De Ridder, Director (retiring April 2026)*
8. *Stephen Jones, Director*
9. *Moazzam A. Khan, Director*

*Tronox's Board of Directors consists of:*

1. *S. A. Kaye*
2. *S. Fodor*
3. *M. Keegel*
4. *P. Barnett*

Appendix reference: A4.2 – Tronox UK full accounts 2024

## A5 Operational links with other companies or persons

1. Please complete the table below if your company has established long-term agreements and/or relationships with any non-associated company/companies located in the UK, 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.

*Tronox [Sensitive information redacted – Tronox's business operations].*



*There are several [Sensitive information redacted – Tronox’s business operations] that are listed below for goods and services that are required for the production of the like goods at the Tronox site in the UK. Tronox is [Sensitive information redacted – Tronox’s business operations].*

Appendix reference: N/A

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix number of contract
<i>[Sensitive information redacted – Tronox’s business operations]</i>			

+Add additional rows as required

2. If your company has long-term agreements with other companies/persons for the supply of goods destined for internal sale, can you:
  - Provide copies of the contracts as evidence of these agreements.
  - Explain how the prices of the internal sales have been determined.

N/A.

Appendix reference: N/A

## A6 Accounting practices

1. What accounting standards have been adopted by your company (e.g. IFRS)? Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If yes, provide details.

*Tronox’s financial statements are prepared in accordance with Financial Reporting Standard 101 Reduced Disclosure Framework (FRS 101).*

*The financial statements have been prepared under the historical cost convention and in accordance with the Companies Act 2006 as applicable to companies using FRS 101.*

Appendix reference: N/A

2. If any changes have occurred with respect to your accounting practices and/or policies during the injury period, please explain the changes. The explanation should include dates and the reasons for those changes along with the financial impact of those changes on the goods concerned.



*There are no such changes.*

Appendix reference: N/A

3. State your financial accounting period (e.g. 1 January to 31 December)?

*1 January to 31 December.*

Appendix reference: N/A

4. Has your accounting period changed during the injury period? If yes, describe these changes.

*No.*

Appendix reference: N/A

5. For your company and any associated parties involved in the production, marketing or sales of your like goods, attach copies of your financial statements and audit reports covering the injury period. If your financial statements are unaudited, explain why this is the case.

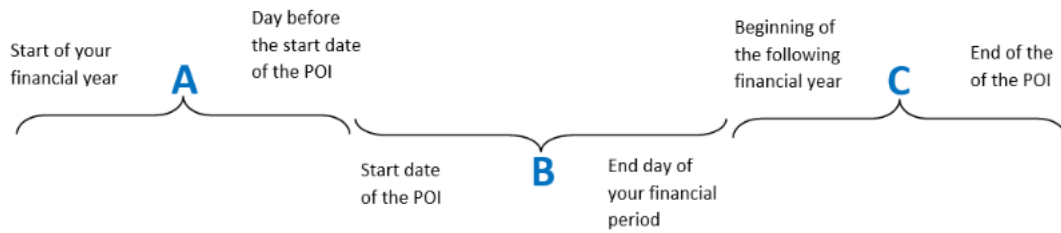
*Draft 2025 accounts will be available in April 2026.*

Appendix reference: N/A

6. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI. If your financial year is fully aligned with the POI, this is all that is required.

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

- A. The trial balance which starts from the beginning of your financial year and ends on 31 December 2024;
- B. The trial balance which starts from 1 January 2025 to the end of your financial year; and
- C. The trial balance which starts from the beginning of your following financial year and ends on 31 December 2025.



*The trial balances for the POI [Sensitive information redacted – Tronox’s business operations], the financial consolidation system, are enclosed.*

Appendix reference: A6.1 – [Name of financial consolidation system]; A6.2 – [Name of financial consolidation system]

7. For your company and any associated parties involved in the production, marketing or sales of the like goods, provide workings (explaining sources) used to produce the annex information for the like goods for the POI. Please also state basis of allocations and assumptions made. This information helps us reconcile your data.

*The workbook, including source data, used to complete the injury data, is enclosed.*

Appendix reference: A6.3 – UK injury data input finance

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

*Tronox Group’s financial statements for 2025 and Form 10-K for 2025 are enclosed.*

Appendix reference: A6.4 – Tronox Holdings FS25; A6.5 – Tronox Holdings Form 10-K 2025



## SECTION B: About your goods

### B1 Understanding your like goods

The goods concerned in this investigation are defined in [‘the scope of this investigation’](#).

We use a PCN number to help us compare the goods concerned and the domestic like goods. When you are completing this section, you must apply the PCN system set out above to describe your goods consistently throughout your responses. If you don't use the PCN table correctly, this could limit the TRA's ability to use the information you provide.

1. Explain the internal coding system your company uses to classify your range of like goods.

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

*Tronox uses grade names to classify its range of Rutile TiO2 products. In the POI, Tronox produced:*

- *TiONA 595*
- *TiONA 168*
- *TiONA 244*
- *TiONA 722*

*Product data sheets for each grade are enclosed.*

Appendix reference: B1.1 – TiONA 595;  
B1.2 – TiONA 168; B1.3 – TiONA 244;  
B1.4 – TiONA 722

2. Please complete **Annex 2 – PCN comparison**. If your company manufactures a range of like goods, list this information for each make and model in the range.

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

*See Annex 2.*

Appendix reference: N/A

3. If there are differences in characteristics within your range of 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.

*There are no such differences. See Section A.3.2 of the Application.*

Appendix reference: N/A

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

*There are no such differences. See Section A.3.1 of the Application.*

Appendix reference: N/A

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

N/A.

Appendix reference: N/A

## B2 Understanding the UK market

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

*More than 80% of Rutile TiO<sub>2</sub> is used to produce paints, coatings and plastics, and the remainder is used in a wide range of applications (paper, rubber, ink, cosmetic and pharmaceuticals).*

*Below are estimates of the proportion of Tronox's UK Rutile TiO<sub>2</sub> sales by customer or end use:*

- Paints and coatings: ~[60-80]% of Tronox's sales of Rutile TiO<sub>2</sub> goes to the paints and coatings industry.*
- Plastics: ~[8-12]-[12-17]% of Tronox's sales of Rutile TiO<sub>2</sub> goes to the plastics industry (masterbatch, PVC and compounding).*
- Paper laminate: ~[12-17]-[17-23]% of Tronox's sales of Rutile TiO<sub>2</sub> goes to the paper laminate industry.*



*For more details, see Sections A.3.1, Sub-section C and A.3.5, Sub-sections B and C of the Application.*

Appendix reference: N/A

2. Provide a general description of the nature of competition within the overall UK market for the goods concerned and the like goods.

*As explained in the Application, UK Rutile TiO<sub>2</sub> directly competes with Chinese Rutile TiO<sub>2</sub> because there is no material difference between the physical, technical, chemical, or any other characteristics of UK Rutile TiO<sub>2</sub> and Chinese Rutile TiO<sub>2</sub>.*

*For more details, see Sections A.3.1 and A.3.5, Sub-sections A and F of the Application.*

Appendix reference: N/A

3. How price sensitive is demand for the goods concerned and like goods? In other words, to what extent will the overall demand for rutile titanium dioxide change in response to changes in price?

*As explained in the Application, price is the key factor in any customer's choice to buy Rutile TiO<sub>2</sub>. Other factors, such as quality, performance, versatility, and security of supply, play a much less important role in the buying decision. Therefore, changes in price are expected to affect demand significantly.*

*For more details, see Section A.3.5, Sub-section G of the Application.*

Appendix reference: N/A

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

*See response to Question B2.3 above. For more details, see Section A.3.5, Sub-section G of the Application.*

Appendix reference: N/A

5. To what extent is it feasible for producers to change their level of production in response to changing market conditions such as increases in prices? What costs (tangible and intangible) are involved in changing levels of production?

*Like with any chemical production, TiO<sub>2</sub> manufacturing facilities are theoretically capable of producing volumes up to nameplate capacity. In the case of Tronox,*



*nameplate capacity is 165,000 MT per annum. However, the maximum annual production that Tronox has achieved is [125–165,000] MT.*

*Similarly, each manufacturing facility can only decrease production to a specific minimum level, for both technical and financial reasons. In the case of Tronox UK, the lowest sustainable level of production is [85–115,000] MT. It is not technically feasible for the plant to operate on a stable basis at lower production rates, primarily due to the risk of equipment damage and need for substantially increased maintenance stoppages.*

*Financially, given the substantial fixed costs associated with operating a TiO<sub>2</sub> production facility, production of [85–115,000] MT per annum or less is not viable due to the impact on per unit costs (i.e. fixed cost absorption).*

Appendix reference: N/A

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

*As explained in the Application, the UK market for Rutile TiO<sub>2</sub> is set to grow in the coming decade. The primary drivers for this growth are:*

- Expansion in the construction industry, and*
- Growing adoption of architectural paints and coatings, which are both UV- and water-resistant.*

*For more details, see **Section A.3.5, Sub-section H** of the Application.*

Appendix reference: N/A

7. What are the major distribution and marketing channels within the UK market for the goods concerned and the like goods?

*As explained in the Application, the distribution and marketing of Rutile TiO<sub>2</sub> is operated under a global commodity model. Large industrial customers are typically supplied through long-term direct contracts, while smaller customers are served via regional distributors and trading companies providing logistics and technical support.*

*Tronox uses [Sensitive information redacted – Tronox’s business operations].*

*For more details, see **Section A.3.5, Sub-sections C and E** of the Application.*

Appendix reference: N/A

8. Who are the general users/consumers/customers within the UK market for the goods concerned and the like goods?



*See response to **Question B2.1** above. For more details, see **Section A.3.5, Sub-sections C and E** of the Application.*

Appendix reference: N/A

9. Do the goods concerned and like goods compete directly with one another?

*See response to **Question B2.2** above. For more details, see **Sections A.3.1 and A.3.5, Sub-sections A and F** of the Application.*

Appendix reference: N/A

10. Provide a general description of any government regulations or tax incentives affecting the production or sale of the goods concerned and the like goods.

*UK Rutile TiO<sub>2</sub> producers face stringent environmental and safety compliance costs, particularly for waste disposal and CO<sub>2</sub> emissions under REACH, UK chemical regulations, and the UK emissions trading scheme.*

*In the PRC, safety and environmental regulations, including those on waste, are much more lenient than those implemented in the UK and, in addition, they are not strictly enforced.*

*For more details, see **Section A.3.5, Sub-section D** of the Application.*

Appendix reference: N/A

11. Provide a general description of developments in technology affecting the characteristics, demand or the production process of the goods concerned and the like goods.

*The Rutile TiO<sub>2</sub> industry is mature, with no fundamental technological breakthroughs since the chloride production method was commercialised in the 1960s. Subsequent developments have not materially changed the characteristics, demand, or production processes of Rutile TiO<sub>2</sub>.*

*For more details, see **Section A.3.5, Sub-section I** of the Application.*

Appendix reference: N/A

12. Are there any goods which could be substituted for the goods concerned and the like goods?



*Rutile TiO<sub>2</sub> is produced globally across multiple jurisdictions and is fully substitutable regardless of origin, including UK and Chinese.*

*However, there is currently no alternative product to Rutile TiO<sub>2</sub> on the global market that offers comparable performance at similar cost.*

*For more details, see **Section A.3.5, Sub-section J** of the Application.*

Appendix reference: N/A

13. Please provide a comment on any other factors which influence the market for the like goods and goods concerned.

N/A.

Appendix reference: N/A



## SECTION C: Costs and production

### C1 Cost to make and sell

1. Please complete **Annex 3 – Cost to make and sell** for the POI for your like goods sold on the domestic market. All figures should be reported net of recoverable tax.

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

See Annex 3.

Appendix reference: N/A

2. Describe the individual components of the costs included in **Annex 3 – Cost to make and sell** and provide detail on how these costs are paid.

*The manufacturing costs per MT are calculated for each month's production volume. The manufacturing costs consist of:*

- *Variable costs [Sensitive information redacted – Tronox's business operations]; and*
- *Fixed costs [Sensitive information redacted – Tronox's business operations].*

*The costs are paid to [Sensitive information redacted – Tronox's business operations].*

*Ore is purchased [Sensitive information redacted – Tronox's business operations]. Other raw materials and supplies are [Sensitive information redacted – Tronox's business operations].*

*The source data for Annex 3 is enclosed.*

Appendix reference: C1.1 – MSA 2025

3. If your company is vertically integrated, please provide details of how the product cost is transferred from one production process to another (e.g., at cost, internal transfer).

*Ore is purchased from [Sensitive information redacted – Tronox's business operations].*

Appendix reference: C1.2 – Intercompany agreement

4. Do you use standard costing?



If yes, then, can you explain:

- a. Were standard costs converted to actual costs in your responses?
- b. If there are variances, have they been allocated to the goods concerned? If yes, how were they allocated?

*Tronox uses [Sensitive information redacted – Tronox’s business operations].*

*When the actual cost of manufacture in a month is calculated, this actual cost is [Sensitive information redacted – Tronox’s business operations].*

*In **Annex 3**, Tronox used the actual cost of production in each month.*

Appendix reference: N/A

5. If some of the inputs (e.g., raw materials, energy) used in the production of your like goods are produced by an associated party, provide details of this arrangement, and attach documentation demonstrating any agreements you have.

*Tronox has globally applicable, arm’s length transfer pricing agreements between its associated entities which include:*

- *[Sensitive information redacted – Tronox’s business operations].*

*Tronox also uses technology [Sensitive information redacted – Tronox’s business operations].*

Appendix reference: C1.5 – Intercompany agreement

6. 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/depreciated in your accounts.

N/A.

Appendix reference: N/A

7. Explain the sources of finance you use to produce your like goods.  
For example:
  - External financing sources (e.g. loans, investments, grants, purchase order financing etc.) or
  - Internal sources (e.g. Retained earnings, business line and trade credits, etc.).

Please ensure that the documents evidencing your sources of finance are ready for verification.



*Tronox Group funds its operations, production, and capital investments through a [Sensitive information redacted – Tronox’s business operations]. The core sources of finance include [Sensitive information redacted – Tronox’s business operations].*

Appendix reference: N/A

8. Are there any costs of finance (e.g., interest payments on loans, bank overdrafts) associated with the production of the like good?

If yes, how do you report this in your company accounts?

*Yes, for its UK operations, Tronox incurs finance costs associated with its external debt facilities, including interest on [Sensitive information redacted – Tronox’s business operations].*

*These finance costs are reported in company accounts primarily within [Sensitive information redacted – Tronox’s business operations].*

*The Tronox Group’s SEC filings detail these financing arrangements and their associated costs, which align with our accounting treatment.*

Appendix reference: A6.5 – Tronox Holdings Form 10-K 2025

9. Please state the cost allocation method used for each cost type listed in **Annex 3 – Cost to make and sell**, including an explanation of the allocation under each subheading and to PCNs.

*In the POI, Tronox [Sensitive information redacted – Tronox’s business operations].*

*Costs are allocated to [Sensitive information redacted – Tronox’s business operations].*

Appendix reference: N/A

## C2 Cost and sales reconciliation

1. Please complete the Cost reconciliation table in **Annex 4 – Cost reconciliation** starting from the bottom of the table and filling in only the white cells. This section will help us reconcile the cost data provided in section **Annex 3 – Cost to make and sell**.

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

*See Annex 4.*



Appendix reference: N/A

### C3 Production process

1. Please provide a written summary and a diagram/flow chart, if available, of your production process clearly indicating the different production stages for your like goods carried out by your company.

*The Tronox Group is a vertically integrated producer of Rutile TiO<sub>2</sub>, with the Tronox’s UK operations supplied by titanium feedstock from the [Sensitive information redacted – Tronox’s business operations].*

*At Tronox’s UK site, Rutile TiO<sub>2</sub> is produced using the chloride method, which involves:*

- *As a first step, chlorination, which entails chlorinating titanium feedstock materials in a fluidized bed reactor to produce titanium tetrachloride (“TiCl<sub>4</sub>”).*
- *As a second step, oxidation, which entails production of Rutile TiO<sub>2</sub> and chlorine, obtained through the reheating and reacting of the cooled TiCl<sub>4</sub> gas with oxygen.*
- *As a third step, finishing, which includes steps such as filtering, micronising, and surface treatment.*

*For more details, see **Section A.3.4, Sub-section A** of the Application. See also slides 26-27 of the site familiarisation visit presentation of 5 February 2026.*

Appendix reference: C3.1 – Familiarisation visit presentation

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

*All parts of the production process take place in the UK.*

*In the production process, chlorination adds the most value.*

*For more details, see **Sections B.1 and A.3.4, Sub-section A** of the Application.*

Appendix reference: N/A

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



Company name	Physical address
<i>Tronox Pigment UK Ltd.</i>	<i>Laporte Road, Stallingborough, Grimsby, North East Lincolnshire, England, DN40 2PR</i>
Appendix reference: N/A	

## C4 Joint products and by-products

1. Please explain any waste, scrap or by-products related to the production of 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 or by-products is recorded; and
  - the average waste, scrap, and by-product ratio resulting from the production process of the goods concerned and like goods.

*See Section A.3.5, Sub-section D of the Application.*  
*As Annex 3 shows, Tronox gets [Sensitive information redacted – Tronox’s business operations].*

Appendix reference: N/A

2. 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.

N/A.

Appendix reference: N/A

3. Please explain how your costs of production (per unit) differ between the like goods and its joint products, if applicable. Comment on the reason for this difference and explain your method(s) of calculation.

N/A.

Appendix reference: N/A

4. Has the demand for the joint product affected the production of or demand for the like goods during the POI or the injury period? If yes, can you provide reasons why this is the case and supporting evidence.



N/A.

Appendix reference: N/A

## C5 Raw material (RM) and major input purchases

1. Please complete **Annex 5.1 – Raw materials and input purchases**, detailing by transaction, purchases for cost types used in the production of the like goods which account for more than 5% of total cost to make and sell (or if energy more than 1%), during the POI by your company.

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

*See Annex 5.1.*

Appendix reference: N/A

2. Please provide an invoice and any supporting documents for two of your typical purchases stated within **Annex 5.1 – Raw materials and inputs**. Use the box below to give an overview of any supporting documents provided.

*Tronox has enclosed:*

- *An invoice issued by [Sensitive information redacted – Tronox’s business operations] for the purchase of energy;*
- *An invoice issued by [Sensitive information redacted – Tronox’s business operations] for the purchase of energy; and*
- *An [Sensitive information redacted – Tronox’s business operations] invoice for the purchase of ore.*

Appendix reference: C5.1 – [Tronox supplier] purchase; C5.2 – [Tronox supplier] purchase; C5.3 – Intercompany ore purchase

## C6 Direct labour

1. Please complete **Annex 5.2 – Direct labour costs**, detailing the monthly direct labour costs per PCN for the like goods during the POI by your company. Please include all labour costs including employers’ national insurance, employers pension contributions and accruals/ payments for bonuses.

*See Annex 5.2.*



Appendix reference: N/A

## C7 Purchases of like goods and/or goods concerned

1. Please complete tab 6) **Purchases of goods** tab in the **Annex**. This tab collects information relating to your company's total annual purchases over the injury period of:

- Like goods purchased from other UK producers for sale on the UK market
- Like goods purchased from third countries for sale on the UK market
- Goods concerned

All figures should be reported net of recoverable tax. List for each year every country you have purchased from in a separate row.

2. How often (e.g. monthly, quarterly, yearly, one off purchase etc) do you purchase:

- Like goods purchased from other UK producers
- Like goods purchased from third countries
- Goods concerned

*Tronox [Sensitive information redacted – Tronox's business operations]. Tronox purchases and imports into the UK [Sensitive information redacted – Tronox's business operations]. See Annex 6 for more detail.*

Appendix reference: N/A

3. Describe how these purchases fit into your business model.

Attach copies of any agreements or contracts that you have relating to your purchases of like goods and/or goods concerned

*See Section C1.5. These purchases serve to complement Tronox's own production.*

Appendix reference: C1.5 – Intercompany agreement



## SECTION D: Sales

### D1 Domestic sales

1. Please complete **Annex 7 – Transaction by transaction (T by T) domestic sales**.

The data provided should reflect only domestic sales of like goods and/or goods concerned manufactured in the UK.

Please contact the Case Team if you cannot provide the relevant information in the level of detail requested.

*See Annex 7.*

Appendix reference: N/A

### D2 Export sales

Please complete **Annex 8 – Export sales**.

- These should include all your export sales of like goods for the POI.
- Please ensure that you report your total volume and total value for your export sales by PCN, by country of destination.
- All figures should be reported net of recoverable tax.

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

Please provide a list of overseas associated customers who purchase like goods. Explain the nature of the association and any effect it has on the terms of sale to that customer.

*See Annex 8. All sales to [Sensitive information redacted – Tronox’s business operations]. All other sales are [Sensitive information redacted – Tronox’s business operations].*

Appendix reference: N/A

### D3 Sales reconciliation

1. Please complete the Sales reconciliation table in **Annex 9 – Sales reconciliation** starting from the bottom of the table.



2. Additionally, please provide quantitative estimates (e.g., projections or forecasts) for the sales revenue and quantity of like goods as well as all other goods you produce on the UK market for the next five years.

See Annex 9.

Appendix reference: N/A

## D4 Distribution channels and price setting

1. Explain your pricing policy?

Provide supporting evidence (examples; price lists, individual customer or per-job price negotiations, prices directly following market prices etc.) for your sales of the like goods during the POI.

*There are [Sensitive information redacted – Tronox’s business operations]. Prices are typically set [Sensitive information redacted – Tronox’s business operations]. [Sensitive information redacted – Tronox’s business operations] also influence negotiations and the outcome. COGS is impacted, in particular, by [Sensitive information redacted – Tronox’s business operations].*

*Prices are [Sensitive information redacted – Tronox’s business operations]. In some cases, contracts may have clauses that [Sensitive information redacted – Tronox’s business operations].*

Appendix reference: N/A

2. If any price reductions have been applied to any of your sales of like goods over the POI, please provide a description. This includes discounts, rebates, credit terms, allowances and commissions.
- Explain the terms and conditions that must be met for any price reduction.
  - Indicate any price reduction not included in an invoice price. Explain how the invoice price and the price reduction have been calculated.
  - If you have issued any credit notes that are not reflected in invoice prices, provide details of the criteria for issuing such notes and the impact that they have on prices (both past and future).

*A price reduction (whether by rebate or credit note) can occur under one of two circumstances:*

*[Sensitive information redacted – Tronox’s business operations].*

*Annex 7 reports all rebates or discounts.*



*Annex 7 does not report [Sensitive information redacted – Tronox’s business operations and data].*

Appendix reference: N/A

3. Please provide details of your distribution network for your goods, if you have one.

*Tronox makes sales through two channels:*

- *Direct to users that are manufacturers of coatings, plastics or paper (usually décor paper for laminated products) and other niche applications. In this channel, the key driver to price is [Sensitive information redacted – Tronox’s business operations].*
- *Through distribution channels for onward sales to manufacturers of coatings, plastics and other niche applications. Price within the network of distributors is [Sensitive information redacted – Tronox’s business operations]. Overall price here is [Sensitive information redacted – Tronox’s business operations].*

*See also Section A.3.5, Sub-section E of the Application.*

Appendix reference: N/A

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

*Selling prices include [Sensitive information redacted – Tronox’s business operations]. Typically, Tronox sells at [Sensitive information redacted – Tronox’s business operations].*

Appendix reference: N/A

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

*The driver for delivery price is distance.*

*For more details, see Section A.3.5, Sub-section E of the Application.*

Appendix reference: N/A

6. Attach sales contracts for the top five domestic customers by volume in **Annex 7 – T by T domestic sales** that you have sold like goods to in the POI.



*The top five domestic customers of Tronox by volume [Sensitive information redacted – Tronox’s business operations].*

*Tronox does not have contracts with [Sensitive information redacted – Tronox’s business operations]. Regarding [Sensitive information redacted – Tronox’s business operations], Tronox does not have a separate contract with their UK entity. The two available contracts are enclosed.*

Appendix reference: D4.6.1 – Agreement Tronox [Tronox customer]; D4.6.2 – Agreement Tronox [Tronox customer]

7. Attach sales contracts for the top five export customers by volume that you have sold like goods to in the period of investigation.

*The top five export customers of Tronox by volume are [Sensitive information redacted – Tronox’s business operations].*

*Tronox does not have contracts with [Sensitive information redacted – Tronox’s business operations]. The three available sales contracts are enclosed.*

Appendix reference: D4.7.1 – [Agreement Tronox [Tronox customer]; D4.7.2 – Agreement Tronox [Tronox customer]; D4.7.3 – Agreement Tronox [Tronox customer]

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

*The documents are enclosed.*

Appendix reference: D4.8 – Sales documents

## D5 Captive use

1. Please complete **Annex 10 – Captive sales and use**. This should include transaction-by-transaction information for the POI detailing your company’s



individual transfers of the finished like good for internal or captive use. You will need to use the [PCN table](#) to categorise each of these transfers by PCN.

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

2. Please comment on whether your captive use of the like goods has changed over time and what has caused any changes. Please attach evidence to support your answer where required.

N/A.
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Appendix reference: N/A
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## SECTION E: Injury to your company

### E1 Material injury

In this section, we assess the impact of the dumped goods on UK industry during the injury period, by considering economic factors including but not limited to; sales; profits; output; market share; productivity; return on investments; utilisation of capacity; cash flow; stock (finished goods inventories); employment; wages; growth; ability to raise capital and investments.

1. Is your company currently experiencing material injury? If so, please describe the nature and degree of the injury, with reference to the above economic factors.

Please specify and substantiate your claims with evidence.

*Yes, Tronox is suffering from injury caused by imports of Chinese Rutile TiO<sub>2</sub>.  
In sum, import volumes of Chinese Rutile TiO<sub>2</sub> increased over the past 15 years, including in the injury period. The price of these imports is significantly undercutting and underselling Tronox on the UK market. As a result, Chinese Rutile TiO<sub>2</sub> producers sharply increased their market shares.  
In contrast, Tronox's sales prices dropped by 15% during the injury period due to the increasing price pressure exerted by unfairly traded Chinese Rutile TiO<sub>2</sub> imports. These loss-making price levels meant that Tronox did not manage to turn a profit in the injury period.  
For more details, see **Sections F.1 and G.1** of the Application, which remain applicable for the POI.  
For updated injury data, see **Annex 11**.*

Appendix reference: N/A

2. Please estimate the date when the injury began to affect your company. Explain how it has developed since this date.

*Tronox considers that injury began to affect it around 2020-2021, although Chinese Rutile TiO<sub>2</sub> imports started increasing since 2009-2010. Injury increased exponentially ever since, as the market share of Chinese Rutile TiO<sub>2</sub> increased while Tronox has been forced into selling at loss-making price levels to protect volumes.  
For more details, see **Sections F.1.1 and G** of the Application, which remain applicable for the POI.*



*For updated injury data, see Annex 11.*

Appendix reference: N/A

3. Please provide details if your cost of production of the like goods has changed significantly during the injury period. If so, please explain the cause(s) and, where possible, substantiate with evidence.

*Despite significant inflationary pressure, Tronox managed to reduce costs of goods sold over the injury period through cost discipline.*

*For more details, see Section F.1, Sub-section C.2.4 of the Application, which remains applicable for the POI.*

*For updated cost of production data, see Annex 3.*

Appendix reference: N/A

4. Please complete **Annex 11 – Injury**. This should be completed in reference to your UK production of the like goods for the injury period.

*See Annex 11.*

Appendix reference: N/A

5. Please explain how you calculated and apportioned your average operating profit before tax (PBT) for the like goods.

*Tronox calculates profit before tax as revenue, less COGS, selling, general and administrative expenses, interest, and other income and expenses.*

Appendix reference: N/A

6. Please explain how you calculated and apportioned your finance costs (e.g., interest) incurred for the like goods.

*As Tronox produces only the like product, finance costs incurred are not apportioned.*

Appendix reference: N/A

7. Please explain how you assess your stock levels. Indicate if your stock levels were abnormal during the injury period. If so, provide an explanation.

*The total volume of stocks increased to high levels over the injury period, reflecting also that Tronox lost sales due to dumped imports of Chinese Rutile TiO<sub>2</sub>.*



*For more details, see Section F.1.1, Sub-section C.2.2, of the Application, which remains applicable for the POI.*

*For updated stocks volume and value data, see Annex 11.*

Appendix reference: N/A

8. Please explain how you estimated your percentage of market share for the like goods.

*Tronox relied on its own data plus its market intelligence, which is based on trade flow analysis and demand estimates that are reviewed and revised by Tronox's marketing team.*

*See Section D.2.1 of the Application, Annex 1 and Annex 2 to the Application.*

Appendix reference: N/A

9. Please explain how you calculated your production capacity and capacity utilisation for the like goods, and the cause of any significant variations.

*The Tronox Stallingborough site's nameplate capacity of 165,000 MT is based on the following assumptions:*

- [Sensitive information redacted – Tronox's business operations].*

*Based on these assumptions, production capacity is calculated as follows:*

- [Sensitive information redacted – Tronox's business operations].*

*There were no variations to the site's production capacity over the injury period.*

*Utilization is calculated as production divided by production capacity.*

Appendix reference: N/A

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

*For employees on personal contracts, Tronox operates [Sensitive information redacted – Tronox's business operations], when determining salaries and conducting the annual salary review.*

*Salaries are benchmarked against both the UK chemical industry and the wider manufacturing sector, with market data reviewed annually to ensure compensation remains competitive.*

*For employees represented by the union under a collective bargaining agreement, where pay is negotiated through collective negotiation, Tronox works collaboratively with union representatives to agree an annual pay review that reflects cost-of-living considerations.*

Appendix reference: N/A



11. Please explain how your total employees involved in the UK manufacture of like goods are split across different sites/locations and explain your methodology.

N/A.

Appendix reference: N/A

12. For your like goods only, please state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve in the absence of injury and explain how you arrived at this figure. Please explain how this figure can be applied to your costs. Your answer may form an important part of any injury or undercutting calculations in the investigation that are based on target sales prices.

*Absent injury from dumped Chinese Rutile TiO<sub>2</sub>, Tronox would expect a net profit level before tax of 20.0%.*

*This target net operating profit is corroborated by:*

- The [~20]% average pre-tax operating profit margin calculated by [Sensitive information redacted – A market intelligence provider] for the 10 best performing Rutile TiO<sub>2</sub> plants outside of the PRC in 2024; and*
- The [~20]% average pre-tax operating profit margin calculated by [Sensitive information redacted – A market intelligence provider] for the 10 best-performing Rutile TiO<sub>2</sub> plants outside of the PRC in 2021.*

*See Section F.1.4 of the Application.*

Appendix reference: N/A

13. Explain how you set your current sales price for your like goods. Is this the same as your target sales price? If not, please explain the reasons for this.

*Tronox [Sensitive information redacted – Tronox’s business operations]. Prices are [Sensitive information redacted – Tronox’s business operations]. As part of this process, [Sensitive information redacted – Tronox’s business operations].*

*Prices are [Sensitive information redacted – Tronox’s business operations].*

*Pricing is commoditized, and Tronox must respond to prevailing competitive conditions. In some cases, customer contracts may include clauses that [Sensitive information redacted – Tronox’s business operations].*

*Tronox’s current sales prices are far below target prices, because price pressure from Chinese Rutile TiO<sub>2</sub> producers does not allow the Tronox to increase its prices to sustainable levels. This is reflected in the underselling (or injury) margin computed by Tronox, which is a whopping 67.9%.*



See **Section F.1.5** of the Application and **Annex 8** to the Application.

Appendix reference: N/A

14. Explain any variances between your actual and forecasted budgets over the injury period, with reference to your profitability and/or cash flow statements. Would your forecasted budgets be affected if measures on the goods concerned were not applied? Please describe the nature of any change and substantiate your claims with evidence.

*Forecasted budgets have been considerably higher than actuals since 2022, and Tronox has missed virtually every financial target. This is due to the ever-bigger impact of dumped Chinese Rutile TiO<sub>2</sub>.*

As set out in **Appendix E1.14**:

- *[Sensitive information redacted – Tronox’s business operations].*

*Forecasted budgets do not take into account the imposition of UK anti-dumping duties on Chinese Rutile TiO<sub>2</sub>. However, forecasts would have to be revised if no duties are imposed given the increasingly aggressive pricing of Chinese Rutile TiO<sub>2</sub> producers.*

Appendix reference: E1.14 - Forecasts

15. Complete **Annex 12 – Investments and Return on Investments**.

See **Annex 12**.

Appendix reference: N/A

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

*Tronox understands that “investments” means internal capital deployments, primarily capital expenditures (mining expansions, plant upgrades, maintenance capex), operational investments (working capital), and strategic restructuring initiatives.*

*Tronox’s sources of finance are [Sensitive information redacted – Tronox’s business operations]. These sources support different categories of companywide investments. [Sensitive information redacted – Tronox’s business operations] generally supports capital and short term operational needs; [Sensitive information redacted – Tronox’s business operations] are typically used for long term capital investments and strategic initiatives; and [Sensitive information redacted – Tronox’s business operations] funds maintenance capex and routine operational expenditures.*



*Finance costs have increased because of Tronox’s deteriorating creditworthiness. As explained in **Section F.1, Sub-section C.2.5** of the Application, this is exemplified by the Tronox Group’s credit downgrade by S&P in December 2025, which was caused by oversupply and low prices. Tronox provides three more examples:*

- *For many years, [Sensitive information redacted – Tronox’s business operations].*
- *In Q3 2025, due to the Tronox Group’s deteriorating overall financial condition resulting from dumped Chinese Rutile TiO<sub>2</sub>, Tronox Group needed to enhance its liquidity position through the issuance of an additional USD 400 million of debt in the form of senior secured notes. The senior secured notes bear an interest rate of 9.125%. In contrast, in 2021, the Tronox Group issued approximately USD 1 billion in senior unsecured notes with an interest rate of 4.625%. This shows how, over a period of four years, Tronox had to double the interest rate and secure the notes to be able to attract capital because of the impact of dumped Chinese Rutile TiO<sub>2</sub>.*

*Tronox equity is part of [Sensitive information redacted – Tronox’s business operations].*

- *In Q1 2026, the Tronox Group expanded its securitization receivables program, of which Tronox is a party, by USD 25 million in order to have sufficient liquidity to continue operating the business.*

Appendix reference: E1.16.1 – [Confidential financing arrangement]; E1.16.2 – Tronox Group Q4 Report; E1.16.3 – Tronox 2021 securitization; E1.16.4 – Tronox 2025 securitization

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

*Over the past year, Tronox’s returns on investment declined primarily due to injuriously low Rutile TiO<sub>2</sub> prices. See **Annex 11**.*

Appendix reference: N/A

18. Please complete **Annex 13 – Forward sales contracts**.

Describe and attach copies of all forward sales contracts/ongoing supply agreements for like goods. Comment on these forward sales contracts – are they a usual way of doing business in your industry? Has there been any variation in



the volume and value of forward contracts over time? If so, what has caused this variation?

*Tronox [Sensitive information redacted – Tronox’s business operations].  
While Tronox does [Sensitive information redacted – Tronox’s business operations], there are [Sensitive information redacted – Tronox’s business operations]. Typically, these are [Sensitive information redacted – Tronox’s business operations].*

Appendix reference: N/A

19. If your company is suffering from injury, please explain and indicate the degree to which this has been caused by the alleged dumping of the goods concerned.

Please substantiate your claim(s) with evidence.

*Dumped imports of Chinese Rutile TiO<sub>2</sub> are the cause of injury sustained by Tronox. Dumped imports of Chinese Rutile TiO<sub>2</sub> significantly undercut and undersell Tronox prices. Despite Tronox’s cost control, price pressure from Chinese imports has resulted in significantly lower sales prices, resulting ultimately in sharp losses.  
See Sections F.1.1, F.1.5 and G of the Application.*

Appendix reference: N/A

20. Please explain and indicate the degree to which any other factors might have affected any injury, for example:

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

*The injury that Tronox is suffering cannot be attributed in part or in full to any factors other than dumped imports of Chinese Rutile TiO<sub>2</sub>.  
See Section G.2 of the Application.*

Appendix reference: N/A

## E2 Threat of injury



1. Is your company under threat of injury? If so, please describe the threat, its cause and how the injury is clearly foreseen and imminent.

*Yes. In addition to causing material injury to Tronox, Chinese Rutile TiO<sub>2</sub> imports also threaten to further injure Tronox, as evidenced by:*

- The ongoing build-out of additional production capacity in China despite stagnant Chinese domestic demand. China already possesses massive excess Chinese production capacity, which means that Chinese Rutile TiO<sub>2</sub> producers are reliant on exports to sustain production in support of the Government of China's industrial ambitions.*
- The accelerating increase in dumped imports of Chinese Rutile TiO<sub>2</sub> in recent years from [9-11,000] MT in 2023 to [11-13,000] MT in 2024, before surging to [16-18,000] MT in 2025.*
- The sharp decrease in the prices of dumped imports of Chinese Rutile TiO<sub>2</sub> during the POI, from [2,2-2,5000] GBP/MT in 2022 to [1,5-1,700] GBP/MT in 2025. Prices continued to fall throughout 2025, from [1,6-1,800] GBP/MT in the first quarter of 2025 to [1,5-1,700] GBP/MT in the last quarter of 2025. This price decrease occurred despite rising production costs, particularly the cost of sulphuric acid which impacts approximately 85% of aggregate Chinese production (i.e. those producers who use the sulphate method).*

*With anti-dumping measures in place in the EU, Brazil, India, and Saudi Arabia – of which India, the EU, and Brazil are the PRC's three largest export markets – and an anti-dumping investigation being launched in Australia, Chinese Rutile TiO<sub>2</sub> producers will inevitably redirect ever-larger volumes of Rutile TiO<sub>2</sub> to the UK.*

*The UK Rutile TiO<sub>2</sub> industry, already weakened economically by dumping practices, as evidenced by Venator's bankruptcy and the losses sustained by Tronox, is facing an imminent, existential threat to its survival.*

*See also **Section F.2.1** of the Application.*

Appendix reference: N/A

2. Provide any information you have for producers and/or exporters of the goods concerned in the PRC in relation to their:
- production volumes
  - production capacity
  - utilisation of capacity

Provide evidence to support your statement.

*Regarding production volumes and capacity, Rutile TiO<sub>2</sub> is crucial to the PRC's ambitions in advanced manufacturing and aviation. Therefore, over the past two*



decades, the Government of China has built an extreme level of excess TiO<sub>2</sub> production capacity. In 2005, Chinese TiO<sub>2</sub> production capacity accounted for ~10% of global capacity. In 2024, this was ~55%. Despite the extreme overcapacity, Chinese TiO<sub>2</sub> production capacity continues to increase rapidly. Since 2017, Chinese production capacity increased by more than 60% and further expansions will lead to an increase in capacity of 85% within a decade.

Regarding capacity utilization, a significant part of Chinese Rutile TiO<sub>2</sub> production capacity remains available to further increase inventories. The 2024 average capacity utilisation rate for Chinese TiO<sub>2</sub> production facilities was [70-90] %, leaving [0.5-1.5] million MT in spare production capacity. From 2024 to 2027, the planned additional Chinese production capacity is another [0.5-1.5] million MT.

For those reasons, Chinese TiO<sub>2</sub> producers turned to exports.

For further details and evidence supporting the above statements, see **Section F.2.1** of the Application.

Appendix reference: N/A

3. Do you know how capacity and capacity utilisation among exporters of the goods concerned have changed during the POI, or might change in the next 5 years? Provide evidence if available.

Regarding Chinese Rutile TiO<sub>2</sub> exporters, see **Section E2.2** above.

Regarding non-Chinese Rutile TiO<sub>2</sub> producers/exporters, Tronox produced evidence of closures of production capacities, which have accelerated since the beginning of the injury period – with at least 10 plant closures between 2023 and 2025. These closures removed a total of 842,000 MT in production capacity over the injury period.

During the POI, closed non-Chinese production capacities include Venator's Greatham facility in the UK (150,000 MT), Teluk Kalung in Malaysia (60,000 MT), Uerdingen in Germany (76,000 MT), and Botlek in the Netherlands (90,000 MT). These closures demonstrate an ongoing structural shift that is dismantling non-Chinese TiO<sub>2</sub> production capability, and that will further consolidate market power in the hands of Chinese Rutile TiO<sub>2</sub> producers.

For further details and evidence supporting the above statements, see **Section F.2.1, Sub-section A** of the Application.

Appendix reference: N/A

4. Do you have any information on the stock volumes of the goods concerned/like goods in the domestic market of the PRC?

Provide estimates and substantiate with evidence where possible.



*As explained in response to **Question E2.2** above, Chinese Rutile TiO2 extreme overcapacity combined with slowed down domestic demand will likely have led to a significant buildup of stocks.*

*For more details on Chinese Rutile TiO2 overcapacity, see **Section F.2.1, Sub-section C** of the Application.*

Appendix reference: N/A

5. Are there any other goods that can be produced using the same manufacturing equipment/processes, that are not the like goods/goods concerned?

How feasible would it be to shift production to the like goods/goods concerned

N/A.

Appendix reference: N/A

6. In respect of UK consumer preference, are there any differences between the goods you produce (like goods), and the goods concerned?

What impact do these differences have?

*No. Chinese Rutile TiO2 is like Rutile TiO2 produced by the UK industry. There is no practical difference between the physical, technical, chemical, or any other characteristics of UK Rutile TiO2 and Chinese Rutile TiO2. In the UK market, UK Rutile TiO2 and Chinese Rutile TiO2 are generally regarded as highly interchangeable.*

*See **Section A.3.1** of the Application.*

Appendix reference: N/A

7. How easy/difficult is it for an overseas producer from the PRC to produce goods that meet the UK requirements/standards for the like goods?

Explain and provide supporting evidence where possible.

*Tronox is not aware of any UK product requirements/standards that would make it difficult or prevent Chinese Rutile TiO2 from being imported into the UK, apart from registration requirements that may apply under UK REACH in certain circumstances. As evidenced by the large volume of imports of Rutile TiO2, it is not difficult for Chinese Rutile TiO2 producers to meet UK product requirements/standards for Rutile TiO2.*

Appendix reference: N/A

8. Do you have any information on the trends and projections of demand for the



relevant goods in:

- a. The UK
- b. The overseas exporters market
- c. Third countries domestic markets

*Regarding the UK market, demand for Rutile TiO<sub>2</sub> is set to grow in the coming decade. The primary drivers for this growth are:*

- *Expansion in the construction industry: both residential and non-residential infrastructure needs are set to increase because of urbanization and industrialization; and*
- *Growing adoption of architectural paints and coatings that are both UV- and water-resistant.*

*See **Section A.3.5, Sub-section H** of the Application.*

*Regarding global demand trends and projections, total global demand for Rutile TiO<sub>2</sub> is expected to remain lower than projected growth in Chinese production capacity. Chinese nameplate production capacity is currently approaching [5-7 million] MT, which is broadly equivalent to total global demand. Chinese production capacity is projected to reach almost two and a half times global demand by 2027. Chinese domestic demand has not grown in line with the rapid expansion of Chinese production capacity.*

*As a result, Chinese Rutile TiO<sub>2</sub> producers are increasingly reliant on exports to sustain production. At the same time, the continued expansion of capacity well in excess of both global and Chinese demand exerts sustained pressure on prices, displacing non-Chinese producers in their domestic markets, as explained in response to **Section E2.3**.*

*For further details and evidence supporting the above statements on the Chinese and global demand trends, see **Section F.2.1, Sub-section A**.*

Appendix reference: N/A

9. Would there be any indirect effects on your industry and/or business if trade remedies are imposed on the goods concerned? In your answer, please also comment on the effect of no measures.

*The direct effect is that, if effective anti-dumping duties are imposed, Tronox will be able to revert to selling Rutile TiO<sub>2</sub> on the UK market at profitable price levels, which will help the company return to profitability and ensure that the Tronox Group can continue investing in its UK production facility.*

*If no effective anti-dumping duties are imposed, Tronox will continue being loss-making. If Tronox continues to be loss-making, the Tronox Group would ultimately have to close its production facility in the UK like it was forced to do with its EU*



*production facility in Botlek, Netherlands.*

*Tronox does not believe there will be indirect effects on the Rutile TiO<sub>2</sub> industry if the TRA imposes anti-dumping duties on Chinese Rutile TiO<sub>2</sub>.*

Appendix reference: N/A



## SECTION F: Dumping

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.

### F1 Dumping

1. Do you have any information about the domestic price of the goods concerned in the PRC?

Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes, market intelligence or sales correspondence, or any other documentation relating to the domestic price of the goods concerned in the PRC.

*See Section E.2 of the Application.*

Appendix reference: N/A

2. Do you have any information about the export price to the UK of the goods concerned from the PRC?

Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes or sales correspondence, or any other relevant documentation.

*See Section E.3 of the Application and Annex 5 to the Application.*

Appendix reference: N/A

3. Do you have any information about the sales prices of PRC like goods to countries other than the UK?

Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes or sales correspondence, or any other relevant documentation.

*N/A. See Section E.2.4 of the Application.*

Appendix reference: N/A



## F2 Export incentives and trade measures

1. Are you aware of any incentives for overseas producers to export?

If yes, provide details and any supporting evidence.

See *Section F.2.1, Sub-section A of the Application.*

Appendix reference: N/A

2. Are you aware of any circumvention of trade remedies measures in relation to the goods concerned?

If yes, provide details and any supporting evidence.

See *Section F.2.1, Sub-section E of the Application.*

Appendix reference: N/A

3. Are you aware of any countries that have imposed trade remedies measures on the goods concerned?

If yes, provide details and any supporting evidence that you may have.

What impact has this had on the country/ies that have imposed and have not imposed trade remedies measures on the goods concerned (e.g., whether trade flows have reduced or been re-routed to other countries).

Provide supporting evidence where possible.

See *Section A.1.4 of the Application.*

Appendix reference: N/A

## F3 Adjustments

1. If you are aware of any factors that could mean costs or profits of the goods concerned are not substantially determined by market forces, with the exception of an alleged Particular Market Situation, please provide details and any supporting evidence.

N/A.



Appendix reference: N/A

## F4 Particular market situation

The TRA has received a number of allegations of a Particular Market Situation (PMS) existing in the domestic rutile titanium dioxide market in the PRC. The TRA has yet to make a determination in relation to the allegations. Where it is determined that a PMS exists and the effect of the PMS on the domestic sales price prevents a proper comparison between that and the export price, we would not consider the comparable price appropriate to use for the purpose of determining normal value.

In such circumstances, the TRA may determine the normal value by determining the costs of production plus a reasonable amount for administrative, selling, and general costs and for profits. Adjustments may then be made to these figures using data from an appropriate, representative third country.

Each allegation is listed below, please explain if, how and why it affects the cost of production or price of the goods concerned. Please also provide any supporting evidence or supplementary sources (links to articles/official documents etc) that will demonstrate that the distortion exists in the country.

### State Planning of the Economy

1. It is alleged that enterprises operating under the ownership and control of the Government of the PRC (GoC) affect the market for rutile titanium dioxide and the market for key inputs into the production of rutile titanium dioxide. Please refer to the application for full details of the allegation.

Please comment on these claims and provide any information on enterprises operating under the ownership or control of the GoC.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A

2. Allegations have been made that the GoC has presence in companies which allows them to interfere with respect to prices and costs. Please refer to the application for full details of the allegation. Please comment on these claims and provide any information on GoC presence, including links between managerial positions and Chinese Communist Party (CCP) membership and/or functions for companies in the PRC.



*See Annex E.2.1 to the Application.*

Appendix reference: N/A

## Energy Costs

3. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from low energy costs, as a result of fixed and guided prices. Please refer to the application for full details of the allegation.

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 costs for the production of rutile titanium dioxide in the PRC.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A

## Land Costs

4. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from low land costs. Please refer to the application for full details of the allegation.

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 costs for the production of rutile titanium dioxide in the PRC.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A

## Labour Costs

5. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from low labour costs as a result of non-commercial factors, including the hukou system and restricted access to free unionisation. Please refer to the application for full details of the allegation.



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 rutile titanium dioxide in the PRC.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A

## Finance Costs

6. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from preferential financial arrangements. Please refer to the application for full details of the allegation.

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 rutile titanium dioxide in the PRC.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A

## Tax Costs

7. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from reduced tax costs, including policies adopted by the GoC to reduce tax costs for rutile titanium dioxide producers. Please refer to the application for full details of the allegation.

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 costs (whether domestically or for export) of rutile titanium dioxide in the PRC.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A



## Research and Development Costs

8. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from reduced research and development costs due to beneficial schemes operated by the GoC. Please refer to the application for full details of the allegation.

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 rutile titanium dioxide in the PRC.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A

## Distortions in the titanium dioxide sector

9. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from distortions in the titanium dioxide sector. Please refer to the application for full details of the allegation.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted distortions in the titanium dioxide sector (whether domestically or for export) of rutile titanium dioxide in the PRC.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A

## Distortions in titanium feedstocks

10. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from distortions in titanium feedstocks. Please refer to the application for full details of the allegation.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted distortions in titanium feedstocks (whether domestically or for export) of rutile titanium dioxide in the PRC.



*See Annex E.2.1 to the Application.*

Appendix reference: N/A

## Distortions in sulphuric acid

11. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from distortions in sulphuric acid. Please refer to the application for full details of the allegation.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted distortions in sulphuric acid sector (whether domestically or for export) of rutile titanium dioxide in the PRC.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A

## Distortions in chlorine and caustic soda

12. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from distortions in chlorine and caustic soda. Please refer to the application for full details of the allegation.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted distortions in chlorine and caustic soda (whether domestically or for export) of rutile titanium dioxide in the PRC.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A

## Distortions in coal

13. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from distortions in coal. Please refer to the application for full details of the allegation.

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



that may have impacted distortions in the coal sector (whether domestically or for export) of rutile titanium dioxide in the PRC.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A

### **Distortions in petroleum coke**

14. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from distortions in petroleum coke. Please refer to the application for full details of the allegation.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted distortions in petroleum coke (whether domestically or for export) of rutile titanium dioxide in the PRC.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A

### **Distortions in iron scrap**

15. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from distortions in iron scrap. Please refer to the application for full details of the allegation.

Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted distortions in iron scrap (whether domestically or for export) of rutile titanium dioxide in the PRC.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A

### **Distortions in coal waste disposal**

16. Allegations have been made that rutile titanium dioxide producers in the PRC benefit from distortions in coal waste disposal. Please refer to the application for full details of the allegation.



Please comment on these claims and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted distortions in coal waste disposal (whether domestically or for export) of rutile titanium dioxide in the PRC.

*See Annex E.2.1 to the Application. Tronox notes that its allegation is not limited to coal waste disposal, but extends to all waste disposal.*

Appendix reference: N/A

17. Do you have any further PMS allegations which are not addressed above?

Please comment on these claims and provide any evidence you have available.

*All PMS allegations are included in Annex E.2.1 to the Application.*

Appendix reference: N/A

18. Do you believe that the alleged PMS distortions would affect a proper comparison between the goods concerned and the like goods sold on the domestic market of the PRC? This may include considerations of:

- the normal conditions of competition in each market (export and domestic);
- the existing relationship between price and cost;
- the private commercial decisions of producers and exporters (e.g., advertising or branding costs); and
- any other factors that are identified as relevant.

Please explain your answer.

*See Annex E.2.1 to the Application.*

Appendix reference: N/A



## SECTION G: Economic Interest Test

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

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

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

### G1 Background

1. Please provide the names, legal addresses and telephone numbers of the following domestic companies:

- Those that produce rutile titanium dioxide in the UK;
- Those that are involved in the importation, distribution, or sale of rutile titanium dioxide from third countries.

*See Section C.1 of the Application.*

Appendix reference: N/A

2. Please provide an overview of your upstream supply chain for rutile titanium dioxide (e.g., producers of raw materials). Where possible, please describe the number, location and size of UK producers at each stage.

*See Section 32 of the Pre-Sampling Questionnaire.*

Appendix reference: N/A

3. Please provide an overview of any annual cyclical demand or supply factors that affect your purchases of feedstock materials. (i.e. a particular feedstock is more expensive in July due to..)



*N/A. Rutile TiO<sub>2</sub> feedstock purchasing is not influenced by downstream seasonality, so whilst coatings demand is somewhat seasonal and tends to peak in the spring-summer months, Rutile TiO<sub>2</sub> production does not closely follow these short-term demand fluctuations.*

Appendix reference: N/A

4. Please provide an overview of your downstream supply chain. Please indicate who the consumers of rutile titanium dioxide are, which industry and level of trade they relate to and whether they are companies or private individuals.

*See Section C.3.2 of the Application.*

Appendix reference: N/A

5. Please provide an overview of any annual cyclical demand or supply factors that affect your sales of rutile titanium dioxide. (i.e. There is a higher demand of Titanium dioxide in July due to..)

*On average, Tronox's Rutile TiO<sub>2</sub> annual sales are [Sensitive information redacted – Tronox's business operations]. There is thus only limited seasonality, [Sensitive information redacted – Tronox's business operations and market knowledge].*

Appendix reference: N/A

## G2 Your company

1. Please complete **Annex E1 – Economic Interest Test**, providing employment figures in full-time equivalents (FTE) for each of your company's UK sites or facilities.

How would these employment figures be affected if an anti-dumping measure was imposed? Please support your claims with evidence.

*It is anticipated, given that Tronox is at present the only manufacturer of Rutile TiO<sub>2</sub> in the UK, that Tronox's sales volumes would increase. This would require Tronox to increase its current production levels, which would, in turn, likely result in increased FTEs.*

Appendix reference: N/A

2. How would your domestic sales of rutile titanium dioxide be affected if an anti-dumping measure was imposed? Please support your claims with evidence.



*Tronox's domestic sales of Rutile TiO2 would likely increase. If UK prices were normalized by the imposition of effective anti-dumping duties, it is likely that customers would pivot back to purchasing Rutile TiO2 from suppliers outside the PRC. That is because the incentive to purchase Rutile TiO2 from the PRC – an artificially low, dumped price – would fall away. Many customers prefer sourcing Rutile TiO2 locally or regionally, as this mitigates risks such as delivery delays.*

Appendix reference: N/A

3. How significant is the production of rutile titanium dioxide relative to your company's entire UK production?

*100%. Tronox only produces Rutile TiO2 in the UK.*

Appendix reference: N/A

### G3 Potential impacts of a measure

1. Please describe how you would expect an increase in the import prices of rutile titanium dioxide to affect each of the following. Where possible, please support your claims with evidence.

- Domestic prices of rutile titanium dioxide in the UK;

*An increase in import prices of Rutile TiO2 will create a level playing field that will enable the UK to maintain a domestic production capability of this chemical product that is essential for ongoing economic security and industrial resilience of the UK. Dumped Chinese Rutile TiO2 has forced Tronox to reduce its own prices to a level that imperils its continued existence. Increased import prices are the only way that Tronox can survive as a going concern. As Tronox has demonstrated, its continued production in the UK is only possible due to [Sensitive information redacted – Tronox's business operations].*

Appendix reference: N/A

- Total UK production of rutile titanium dioxide;

*An increase in import prices of Rutile TiO2 will increase the level of production of Rutile TiO2 in the UK.*

Appendix reference: N/A

- Total imports of rutile titanium dioxide from the PRC and other third countries to the UK; and



*An increase in import prices of Rutile TiO<sub>2</sub> will not impact materially the availability of Rutile TiO<sub>2</sub> from the PRC and other third countries. As Figure 1 shows, there is ample production capacity available – seven to eight times total UK demand – to serve the UK market from non-PRC sources. Given so much excess capacity, imports will continue to be readily available for the downstream industry as an alternative source of supply to dumped Chinese Rutile TiO<sub>2</sub>.*

*Figure 1 - EMEA spare capacity of TiO<sub>2</sub><sup>2</sup>*

*[Sensitive information redacted – Copyright-protected market intelligence provider data – The figure shows increasing spare capacity outside China, including in EMEA, alongside declining global capacity utilisation from 2017 to 2025]*

*Imports from the PRC would likely reduce in volume, as the incentive to purchase Rutile TiO<sub>2</sub> from the PRC – an artificially low, dumped price – would fall away.*

Appendix reference: N/A

- Total exports of rutile titanium dioxide from the UK.

*Tronox's export volume would likely remain unchanged or reduce slightly to cater for anticipated increased domestic demand.*

Appendix reference: N/A

2. Do you know of any related industries that would be affected if an anti-dumping measure was imposed?

Please consider in particular:

- Upstream industries – those who produce inputs (such as raw materials) needed for the production of rutile titanium dioxide;

*Anti-dumping measures will largely benefit upstream industries for the same reason that they will benefit Rutile TiO<sub>2</sub> producers: improvement to, or maintenance of, capacity utilization. The significant raw material suppliers to the Rutile TiO<sub>2</sub> industry also operate high-fixed cost business models. They have also been materially injured from the growth in Chinese Rutile TiO<sub>2</sub> imports into the UK because Chinese Rutile TiO<sub>2</sub> producers either exclude these suppliers and machinery producers from their supply chains or because the raw material is not suitable for transport (as is the case with, e.g., chlorine). If production of Rutile TiO<sub>2</sub> in the UK continues to decline due to dumped Chinese Rutile TiO<sub>2</sub> imports, it will become even more difficult for non-Chinese upstream industries' producers to remain competitive.*

<sup>2</sup> Source: Tronox graph based on [Sensitive information removed – Market intelligence provider].



Two particular upstream impacts are worth noting. The first is chlorine production and the chlor-alkali balance.

As explained in **Section A.3.1** of the Application, in the chlor-alkali process, caustic soda and chlorine are produced simultaneously and in fixed proportions through the electrolysis of brine. Producers cannot increase caustic output without also generating chlorine. In commercial terms, caustic soda is typically the primary revenue driver, while chlorine is produced alongside as an unavoidable co-product. Chlorine is difficult to manage if there is no downstream customer to take it. It is a hazardous gas that cannot easily be stored in large quantities. For that reason, chlor-alkali plants depend on having reliable downstream outlets for chlorine. Where chlorine cannot be placed, chlorine offtake becomes a practical constraint on production, even where demand for caustic soda remains stronger.

In the UK, Tronox is a significant chlorine customer. By supplying chlorine to Tronox, the UK's sole chlorine producer, Inovyn, is able to place a co-product that would otherwise constrain the efficient operation of its caustic plants. The arrangement therefore improves the overall economics of Inovyn's chlor-alkali production.

UK government and parliamentary materials consistently characterize the chlor-alkali sector (chlorine and caustic soda) as a foundational, strategically important industry underpinning both economic activity and critical national systems. Parliamentary evidence submitted to committees states that chlorine and caustic are "key building blocks of the modern chemical industry," with their loss likely to trigger the "demise of large sections" of downstream manufacturing and associated jobs and revenues.<sup>3</sup> Other parliamentary evidence emphasizes that chlorine is indispensable to essential services – for instance, it is used in 98% of drinking water purification and in many pharmaceuticals<sup>4</sup> – while caustic soda is required across virtually all chemical processes. More recent UK government analysis (e.g., the 2024 Food Security Report)<sup>5</sup> reinforces this by linking chlorine supply directly to food system resilience and public health infrastructure, warning that disruption to such inputs would affect multiple parts of the supply chain. Taken together, official UK sources frame domestic chlor-alkali production as a critical enabler of industrial capability, public health, and national resilience, rather than a substitutable commodity sector.

The second upstream impact is upstream mining and beneficiation for feedstock production associated with Rutile TiO<sub>2</sub> production.

<sup>3</sup> The role of carbon markets in preventing dangerous climate change - Environmental Audit Committee, Memorandum submitted by INEOS ChlorVinyls, 26 February 2009, **Appendix G3.1**.

<sup>4</sup> Inovyn, House of Commons High Speed Rail (Crewe - Manchester) Bill petition, **Appendix G3.2**.

<sup>5</sup> UK Department for Environment, Food & Rural Affairs, United Kingdom Food Security Report 2024: Theme 3: Food Supply Chain Resilience, **Appendix G3.3**.



*A strong non-Chinese Rutile TiO<sub>2</sub> industry is needed to support a resilient, strong upstream mining and beneficiation industry that produces not only titanium feedstock for Rutile TiO<sub>2</sub> production, but numerous valuable co-products that are critical to the UK economy: rare earth minerals, pig iron, and zircon to name just three. Increased prices of imported Rutile TiO<sub>2</sub> from the PRC will benefit the entire mining and beneficiation supply chain.*

*First, rare earth minerals are a co-product of ilmenite mining. As TiO<sub>2</sub> feedstock mining decreases due to the impact of Chinese dumping, so does the rate of rare earth mineral production.<sup>6</sup> If the UK hopes to develop a rare earth mineral supply chain to support permanent magnet production for the electric vehicle, wind turbine, and other industries associated with decarbonization, it will require a vibrant, sustainable TiO<sub>2</sub> feedstock industry in countries like Australia, Canada, and South Africa that currently supply Tronox (and historically supplied Venator).*

*Second, one of the co-products of TiO<sub>2</sub> feedstock production is zircon, which is used by UK tile and ceramic manufacturers. Because zircon products are co products of TiO<sub>2</sub> feedstock production, reduced TiO<sub>2</sub> feedstock production results in higher production costs for zircon products.*

*Third, high purity pig iron is made either through blast furnace operations or as a co-product from certain metallurgical smelting operations, including from ilmenite smelting. Minimal impurities in this product make it suitable for high-spec applications like oil & gas and military-grade steel and castings, unlike other forms of iron (e.g. basic pig iron and scrap iron).*

*The UK has very limited production of any types of pig iron and no domestic capability to produce high-purity pig iron as a standalone product. Most high purity pig iron sold in the merchant market is imported from Brazil, South Africa, and Canada. The UK is unlikely to be able to produce its own high purity pig iron for the merchant market for many reasons, including the dominance of electric arc steel production (rather than blast furnaces) which are not capable of producing merchant high purity pig iron.*

*Finally, by way of background, PRC producers have established their own feedstock supply chains that rely on Chinese domestic production of feedstock but also increasingly on imports from countries like Mozambique. Human rights violations and environmental degradation associated with mining in Mozambique and other African countries have been documented.<sup>7</sup>*

Appendix reference: G3.1 – Inovyn memorandum; G3.2 – Inovyn House of

<sup>6</sup> In heavy mineral sands mines that produce ilmenite for titanium dioxide production, the ratio of ilmenite to the rare earth bearing mineral monazite is ~30:1 – 50:1.

<sup>7</sup> See, S. Chichava, S. Li and M. G. Sambo, *The Blind Spot: International Mining in Angoche and Larde, Mozambique*, Working Paper No. 2019/28. China Africa Research Initiative, School of Advanced International Studies, Johns Hopkins University, **Appendix G3.4**.



Commons petition; G3.3 – UK Food Security Report; G3.4 – Chinese companies mining practices Mozambique

- Downstream industries – those who purchase rutile titanium dioxide;

#### **A. Importers, traders, retailers, and any intermediary parties**

*Anti-dumping duties on Chinese Rutile TiO<sub>2</sub> will not prevent importers, traders, retailers, or any intermediary parties from doing business with Chinese Rutile TiO<sub>2</sub>. Once the playing field is levelled, these parties will be able to fairly compete with Rutile TiO<sub>2</sub> produced in the UK. Also, these parties will continue to be able to source Rutile TiO<sub>2</sub> from other third countries. The total volume of sales through these parties should not be materially impacted, and the impact on these parties would be limited.*

#### **B. Downstream industries and users**

*Anti-dumping duties on Chinese Rutile TiO<sub>2</sub> might lead to higher raw material prices for downstream users, which they, in turn, should be able to pass on to their customers.*

- **Paints and coatings industry:** *The majority of UK demand for Rutile TiO<sub>2</sub> comes from the paints and coatings industry. Demand within the paints and coatings industry is roughly split [50-70]% in decorative paints and coatings and [20-40]% in a range of industrial coatings.*

*Paints and coatings companies have different purchasing strategies; however, they will typically source from a mix of strategic suppliers and, in addition, have spot purchases that are driven by price.*

*The impact of anti-dumping duties on Chinese Rutile TiO<sub>2</sub> on the UK paints and coatings industry will be limited.*

*First, Rutile TiO<sub>2</sub> is only one of the raw materials in paints and coatings and only accounts for a relatively limited share in total cost to make and sell.*

*Second, as slide 39 of the site familiarization visit presentation of 5 February 2026 shows, there is no correlation between the price of Rutile TiO<sub>2</sub> and the price of paint.*

*Third, in any event, the pricing strategy of Chinese Rutile TiO<sub>2</sub> producers to put non-Chinese Rutile TiO<sub>2</sub> producers out of business will ultimately result in a monopoly for Chinese Rutile TiO<sub>2</sub> producers, allowing them to sharply increase prices.*

- **Plastics industry:** *The main segments of the plastics industry that purchase Rutile TiO<sub>2</sub> are the masterbatch (colour concentrates) industry and the*



*polyvinyl chloride (“PVC”) industry, specifically window frames and doors for construction and flexible PVC such as some flooring applications.*

*The masterbatch industry disperses Rutile TiO<sub>2</sub> into polymers (e.g., polyethylene or polypropylene) and sells the masterbatch to plastics fabricators. The imposition of anti-dumping duties may have an increase in their Rutile TiO<sub>2</sub> cost, but it will bring more stability to the industry as anti-dumping duties are necessary to protect the sole remaining UK Rutile TiO<sub>2</sub> producer. The selling price of white masterbatch will have some correlation to the cost of Rutile TiO<sub>2</sub>, but UK masterbatch producers have historically procured only relatively small volumes from the PRC.*

*The PVC industry uses low levels of Rutile TiO<sub>2</sub> in its formulation for performance reasons. The share of Rutile TiO<sub>2</sub> in total costs to make and sell is limited, so that anti-dumping duties will not impact this segment.*

**C. End-users and consumers**

*Price increases for end users or consumers would be minimal and significantly below the typical product price fluctuations of finished products. That is, in the first place, because the costs of Rutile TiO<sub>2</sub> in the final product are small. For example, in typical applications, the Rutile TiO<sub>2</sub> content in final plastic articles is <[5-10]%. The impact on total cost to make and sell would be significantly lower.*

Appendix reference: C3.1 – Familiarisation visit presentation

- Industries for complimentary goods – those which would typically be bought alongside rutile titanium dioxide (such as ink being bought with printers); and

*There would be no significant impact, as Rutile TiO<sub>2</sub> has very limited (if any) exposure to complimentary goods.*

Appendix reference: N/A

- Industries for substitute goods – those which might be bought instead of rutile titanium dioxide (such as margarine instead of butter).

*There is no substitute for Rutile TiO<sub>2</sub>.*

Appendix reference: N/A

3. To what extent would you expect any changes in prices of rutile titanium dioxide to be passed onto final consumers?



*There would be a limited impact, if any, on the price of goods to final consumers. In other jurisdictions, Tronox Group has noticed a price difference to final consumers that amounted to a pennies-in-the-pound price increase.*

*In paint, as slide 39 of the site familiarization visit presentation of 5 February 2026 shows, there is no correlation between the price of Rutile TiO<sub>2</sub> and the price of paint. Many industrial coatings are used on high-priced goods such as cars or domestic appliances, where the total cost of Rutile TiO<sub>2</sub> is negligible. In final plastic articles, the level of Rutile TiO<sub>2</sub> is typically also very small (<[5-10]%) and would have no impact on consumer prices.*

Appendix reference: C3.1 –  
Familiarisation visit presentation

4. Would your plans for investment or expansion in the UK over the next five years be affected if an anti-dumping measure was imposed? Please support your claims with evidence.

*Yes. Anti-dumping duties will significantly increase Tronox’s ability to invest in plant reliability, efficiency, and de-bottlenecking.*

*Over the last several years, Tronox has not been in a position to invest in expansion projects and has been forced to attend only to strictly necessary maintenance activities. The constrained environment in which Tronox is operating largely as a result of the injurious low prices offered by Chinese Rutile TiO<sub>2</sub> producers coupled with the significantly higher compliance burden incumbent on UK manufacturers generally has rendered expansion impossible.*

*Within an unconstrained environment, Tronox would seek to [Sensitive information redacted – Tronox’s business operations]. At present, each of the streams are [Sensitive information redacted – Tronox’s business operations].*

*Tronox has modelled a detailed unrestrained capital analysis that would enable it to de-bottleneck and increase its production to achieve the facility’s full nameplate capacity over the next five years that would be contingent on adequate protection for the UK Rutile TiO<sub>2</sub> industry being put in place via anti-dumping duties.*

*The initiative pipeline is [Sensitive information redacted – Tronox’s business operations]. Figure 2 sets out the base plant capital investment pipeline.*

*Figure 2 – Base plant investment*

*[Sensitive information redacted – Tronox’s pipeline for base plant capital investments]*

*Figure 3 sets out the pipeline for finishing plant capital improvements.*

*Figure 3 – Finishing plant investment*

*[Sensitive information redacted – Tronox’s pipeline for finishing plant capital investments]*



*The activities contemplated in the capex plan for the base and finishing plants must be conducted in [Sensitive information redacted – Tronox’s business operations]. As can be seen in the second column of Figure 4, while it will take [Sensitive information redacted – Tronox’s pipeline for finishing plant capital improvements] years to complete the full capital expansion plan, the benefits thereof will begin to flow relatively early on as each phase will bring capacity improvements.*

*Had the capital expansion project commenced in 2024 as originally planned, the projected outcome would have been as set out in Figure 4.*

*Figure 4 - Capital expansion project*

*[Sensitive information redacted – Tronox’s capital expansion project for 2028]*

Appendix reference: N/A

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 the imposition of an anti-dumping measure might disproportionately affect any of these groups or any other particular group.

*There is no impact on any particular group as listed.*

Appendix reference: N/A

6. How would the number or range of suppliers in the rutile titanium dioxide market be affected if an anti-dumping measure was imposed? Please provide an explanation.

*Anti-dumping measures are necessary to safeguard the continued existence of the only remaining UK Rutile TiO2 producer. Without protection from effective anti-dumping measures, as is demonstrated by Venator’s bankruptcy, the number of suppliers in the Rutile TiO2 market would go to zero.*

Appendix reference: N/A



7. How would the suppliers' ability to differentiate their products by price, quality, service or innovation in the rutile titanium dioxide market be affected if an anti-dumping measure was imposed? Please provide an explanation.

*Historically, Tronox has differentiated itself through quality, service, and innovation. However, the ever-lower price of dumped Chinese Rutile TiO<sub>2</sub> has made the price gap between a fair price for Tronox's Rutile TiO<sub>2</sub> and Chinese imports far too large to bridge based on quality, service and innovation.*

*If anti-dumping duties restore a level playing field, Tronox can continue to build on the inherent product quality superiority that Tronox enjoys today and can again promote itself both technically and with excellent customer service. Other non-Chinese producers are also promoting similar levels of technical and service differentiation that ensures a competitive landscape and hence this drives purchasing decisions towards price differentiation as the critical factor.*

Appendix reference: N/A

8. How would the cost of switching between suppliers in the rutile titanium dioxide market be affected if an anti-dumping measure was imposed? Please provide an explanation.

*Rutile TiO<sub>2</sub> is a commodity product and there is no material cost to Rutile TiO<sub>2</sub> users of switching suppliers. In fact, customers routinely do switch suppliers in the ferociously competitive Rutile TiO<sub>2</sub> market.*

*As set out in response to **Section G3.1**, there is ample production capacity from ample sources outside of the PRC from which UK users of Rutile TiO<sub>2</sub> could source Rutile TiO<sub>2</sub>. In addition, UK users could continue sourcing Chinese Rutile TiO<sub>2</sub> – but at fair prices and on a level playing field.*

Appendix reference: N/A

9. How would the suppliers' ability to set agreed prices between themselves or for certain consumers or products be affected if an anti-dumping measure was imposed? Please provide an explanation.

*Tronox [Sensitive information redacted – Tronox's business operations]. Anti-dumping duties would permit Tronox to negotiate prices with its customers at levels that are not depressed and suppressed by unfairly traded Chinese Rutile TiO<sub>2</sub>. As noted in **Section G3.8**, the UK market is highly competitive, and will remain highly competitive after the playing field is levelled by anti-dumping duties on Chinese Rutile TiO<sub>2</sub>.*

Appendix reference: N/A



10. How would the choices of rutile titanium dioxide available to consumers be affected if an anti-dumping measure was imposed? Please provide an explanation.

*The UK Rutile TiO<sub>2</sub> market is mature and there is strong competition on the market from sources other than the PRC. Imposing anti-dumping duties on Chinese Rutile TiO<sub>2</sub> would restore fair competition on the UK market. This would not affect the availability of Rutile TiO<sub>2</sub> for the downstream industries.*

Appendix reference: N/A

11. How would the ability of downstream businesses or consumers to make informed decisions be affected if an anti-dumping measure was imposed? Please provide an explanation.

N/A.

Appendix reference: N/A

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

*In addition to its direct relevance to the paint, coatings and plastics industries, Rutile TiO<sub>2</sub> production sits at the centre of the titanium value chain with implications for many aspects of the UK's economic security and industrial resilience.*

*Perhaps most critically, an intermediate product of the Rutile TiO<sub>2</sub> production process is titanium tetrachloride ("TiCl<sub>4</sub>"),<sup>8</sup> which is a critical precursor for the production of titanium metal, widely used in airframes, engines, landing gear, helicopter rotors and missile systems.*

*The strategic importance of the technology used to produce Rutile TiO<sub>2</sub> and the intermediary product TiCl<sub>4</sub> is evidenced by a 2014 case of intellectual property theft by Chinese actors prosecuted by the United States Department of Justice. In 2014 a federal jury in San Francisco found two Chinese individuals and one company guilty of economic espionage, theft of trade secrets, bankruptcy fraud, tax evasion, and obstruction of justice for their roles in a long-running effort to obtain U.S. trade secrets related to the production of chloride TiO<sub>2</sub> pigment for the benefit of companies controlled by the government of the PRC. The trade secrets included plant-scale manufacturing and process know-how for the chloride route (which also yields TiCl<sub>4</sub>, with both commercial and strategic (aerospace/defence) implications).<sup>9</sup>*

*Without protection of the UK's domestic Rutile TiO<sub>2</sub> industry, there is the very real possibility that the UK's sole remaining manufacturer of Rutile TiO<sub>2</sub> will have to exit the market, leaving the UK aerospace and defence sectors dependent on Chinese*

<sup>8</sup> See Application, Section A.3.4.

<sup>9</sup> U.S. Department of Justice, Walter Liew sentenced to fifteen years in prison for economic espionage, Appendix G3.5.



*supply for Rutile TiO<sub>2</sub>, and, should the UK elect to develop its own titanium metal supply chain, TiCl<sub>4</sub>. The UK aerospace and defence sectors would become exposed to the risk of long-term price rises, reduction in service or innovation, and could even be deprived entirely of these important inputs should the PRC refuse to supply certain customers, like it is doing with other critical minerals.*

*Historically, non-Chinese fabricators of titanium metal parts for the UK (and EU) aerospace and defence industries have been dependent on Chinese, Russian, and Japanese companies to produce TiCl<sub>4</sub> and titanium sponge, the first two steps in the titanium value chain. Tronox believes it is the only non-Chinese TiO<sub>2</sub> producer that is currently producing “metal grade TiCl<sub>4</sub>” for aerospace-quality titanium sponge.*

*See **Section F.2.1** of the Application.*

Appendix reference: G3.5 – Walter Liew sentencing



## SECTION H: Checklist and appendices

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

Section	Please tick if you have responded to all questions
Section A – Company structure and operations	X
Section B – About your goods	X
Section C – Costs and production	X
Section D - Sales	X
Section E – Injury to your company	X
Section F – Dumping	X
Section G – Supplementary questions	X

+Add additional rows as required

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

Appendix reference	Document title
Appendix A2.5.1	Accuris
Appendix A2.5.2	British Standards
Appendix A3.1	Tronox org chart
Appendix A4.2	Tronox UK full accounts 2024
Appendix A5.1.1	Agreement Tronox [non-associated company]
Appendix A5.1.2	Agreement Tronox [non-associated company]
Appendix A5.1.3	Agreement Tronox [non-associated company]
Appendix A5.1.4	Agreement Tronox [non-associated company]
Appendix A5.1.5	Agreement Tronox [non-associated company]
Appendix A5.1.6.1 to 3	Agreement Tronox [non-associated company]
Appendix A5.1.7	Agreement Tronox [non-associated company]
Appendix A6.1	[Name of financial consolidation system]
Appendix A6.2	[Name of financial consolidation system]
Appendix A6.3	UK injury data input finance
Appendix A6.4	Tronox Holdings FY25 FS



Appendix A6.5	Tronox Holdings Form 10-K 2025
Appendix B1.1	TiONA 595
Appendix B1.2	TiONA 168
Appendix B1.3	TiONA 244
Appendix B1.4	TiONA 722
Appendix C1.1	MSA 2025
Appendix C1.2	Intercompany agreement
Appendix C1.5	Intercompany agreement
Appendix C3.1	Familiarisation visit presentation
Appendix C5.1	[Tronox supplier] purchase
Appendix C5.2	[Tronox supplier] purchase
Appendix C5.3	Intercompany ore purchase
Appendix D4.6.1	Agreement Tronox [Tronox customer]
Appendix D4.6.2	Agreement Tronox [Tronox customer]
Appendix D4.7.1	Agreement Tronox [Tronox customer]
Appendix D4.7.2	Agreement Tronox [Tronox customer]
Appendix D4.7.3	Agreement Tronox [Tronox customer]
Appendix D4.8	Sales documents
Appendix E1.14	Forecasts
Appendix E1.16.1	[Confidential financing arrangement]
Appendix E1.16.2	Tronox Group Q4 results
Appendix E1.16.3	Tronox Group 2021 securitization
Appendix E1.16.4	Tronox Group 2025 securitization
Appendix G3.1	Inovyn memorandum
Appendix G3.2	Inovyn high speed rail
Appendix G3.3	UK Food Security Report
Appendix G3.4	Chinese companies mining practices Mozambique
Appendix G3.5	Walter Liew sentencing
Appendix 9.1	Stat accounts 2025 (Not a draft – WIP only)