



Anti-Dumping Questionnaire (Exporter)

Case AD0086: Rutile titanium dioxide exported from the People's Republic of China

Period of Investigation (POI):	1 January 2025 – 31 December 2025
Injury period:	1 January 2022 – 31 December 2025
Deadline for response:	17 May 2026
Contact details:	AD0086@traderemedies.gov.uk
Completed on behalf of:	Henan Billions Advanced Material Co., Ltd.

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

☐ Confidential

☒ Non-confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annexes. Please note that you will have to provide **Confidential** and **Non-Confidential** versions of the questionnaire and annexes, as well as of any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **10 May 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
PSSED	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) are being dumped (exported to the United Kingdom (UK) at prices less than their normal value) and that this dumping is causing injury to the UK industry for these goods.

Why should I take part?

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

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

To note, we use the term company in this questionnaire to cover all businesses including partnerships and sole traders.

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 **10 May 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.

Non-cooperation

The TRA may consider an interested party to be non-cooperative if they fail to cooperate with an investigation, for example by not providing sufficient questionnaire responses or not meeting set time limits, or otherwise significantly impeding the progress of the investigation.

Where we have determined that an interested party has failed to cooperate with the investigation, we may disregard any information they have supplied. We will not find a party to be non-cooperative if we determine they have demonstrably acted to the best of their ability to cooperate with us.

If requested information is incomplete, unverifiable, inappropriately submitted or not supplied within a reasonable time, or is disregarded due to non-cooperation, we may be in a position of having to make determinations on the basis of the facts available, including those available from third party sources and/or those contained in the application for the initiation of the investigation by the domestic industry.

This could in turn lead to a result which is less favourable to the party in question – for instance, it may affect the duty rate that applies to them.

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

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



Instructions on completing this questionnaire

Preparing your response

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

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

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

How to answer the questions

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

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why. If the answer to a question is “zero”, “no” or “none”, please write this.
- Please complete the spreadsheet annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g., 23/05/2019).



- Unless otherwise stated, ‘year’ or ‘calendar year’ refers to the period 1 January – 31 December and ‘quarter’ refers to the associated three-month periods e.g. 1 January – 31 March, 1 April – 30 June, etc.
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g., do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g., ‘1,300’ for one-thousand three hundred, ‘1,300,000’ for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g., £1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of tax unless otherwise stated.
- Please refer to the case number, AD0086, in any correspondence with the TRA.

Preparing confidential and non-confidential copies

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

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

In preparing your response, please note the following:

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



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

Providing information from subsidiaries or associated parties

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

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

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

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

What happens next

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

- you will receive an email confirming the documents have been uploaded successfully.



- the Case Team will contact you if further information is required;
- the non-confidential responses will be placed on the public file; and
- the Case Team may contact you to arrange a visit to verify the information contained in your responses.

Verifying the information you supply

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

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

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

In some circumstances, verification may be conducted remotely.

Please indicate any dates when you would be unable to host a week-long verification visit between June and September 2026.

The company suggests the verification in September.

Appendix reference: **N/A**

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



The scope of this investigation

Goods concerned

This investigation covers **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 classifiable within the following CN code(s):

- | | |
|----------------|----------------|
| • 2823 0000 10 | • 3206 1100 10 |
| • 2823 0000 30 | • 3206 1100 30 |
| • 2823 0000 80 | • 3206 1100 80 |
| • 2823 0000 83 | • 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

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

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



Product Control Numbers

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

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

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

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



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:

Company information	
Legal name of company:	Henan Billions Advanced Material Co., Ltd.
Legal structure (e.g., limited company, sole trader, partnership etc):	Limited Liability Company
Year of establishment:	[Redacted – Date] 2016
Other operating names:	N/A
Company registration number:	91410803MA3XA10A1R
Place of registration:	Jiaozuo City
Address of main site:	Zhongzhan District, Jiaozuo City, Henan Province, China
Postcode:	454000
Contact details	
Name (point of contact):	[Redacted – Personal information which identifies individuals]
Job title:	[Redacted – Personal information which identifies individuals]
Business address:	[Redacted – Personal information which identifies individuals]
Telephone No:	[Redacted – Personal information which identifies individuals]
Email:	[Redacted – Personal information which identifies individuals]
Website:	www.lomonbillions.com



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

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

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

A2 About your company

1. Describe the role of your company in relation to exports of the goods concerned to the UK market (e.g., producer, producer/exporter or exporter/distributor).

Please make it clear whether you are a producer, and if you are not, please contact us within seven days with details of the producers that supply you.



Henan Billions Advanced Material Co., Ltd. (hereinafter referred to as “Henan Billions”) is a producer and exporter of the goods concerned to the UK market.

Appendix reference: **N/A**

2. Did your company export the goods concerned to the UK during the POI?

If yes, can you explain:

- Did you export those goods directly or did you export them indirectly (for example, they were sold through an intermediary, for instance a group company that specialises in exports)?
- If you exported the goods indirectly to the UK, provide details about the parties involved in the exports of the goods concerned to the UK, including their location, activities with regards to the goods concerned and relation to your company?

Henan Billions exported the goods concerned directly and indirectly to the UK during the POI.

In the case of sales to the UK, two trading companies are involved: Billions (Hong Kong) Corporation Limited ("BHK") and Billions Europe Ltd ("BEL").

These two companies and Henan Billions are related in the same group.

BHK is located in Unit 1503, 15/F, One Harbourfront, 18 Tak Fung Street, Hunghom, Kowloon, Hong Kong. It is a trading company that purchases the TiO₂ from related producers and exports them to different foreign markets, including the UK. [Redacted – Commercially sensitive information].

BEL is located in Winder House, Kingfisher Way, Stockton-on-Tees, TS18 3EX, United Kingdom. BEL is a UK trading company that purchases the TiO₂ from related producers and exports them to different foreign markets, including the UK.

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
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+Add additional rows as required.

Henan Billions provides a table in the required format to present the changes over the past 10 years. Please refer to [Appendix A2.3 - Changes in the Legal Form](#).

Appendix reference:
[Appendix A2.3 - Changes in the Legal Form](#)

4. We need to check the legal establishment of your company. Please supply the latest copies of the following documents:

1. Articles of association
2. Business licence
3. Proof of registration of the company with the competent authorities.

Clearly specify what you are submitting and provide appendix references for your attachments in the box below.

Henan Billions provides the latest articles of association and business licence. The business licence is also the proof of registration of the company. Please refer to [Appendix A2.4.1 - Articles of Association](#) and [Appendix A2.4.2 - Business Licence](#).

Appendix reference:
**[Appendix A2.4.1 - Articles of Association](#)
[Appendix A2.4.2 - Business Licence](#)**

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

There is no required authorization in order to produce or sell the product under investigation in the domestic market.



For the export sales, MOFCOM issues an EXPORT LICENCE OF THE PEOPLE'S REPUBLIC OF CHINA for each transaction. Henan Billions has provided the export licence in [Appendix B4.1.5 - Documents of Export Sales to UK](#) as a sample.

Appendix reference:

[Appendix B4.1.5 - Documents of Export Sales to UK](#)



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

Henan Billions follows national standards of the People's Republic of China GB/T 1706-2006 for titanium dioxide pigments and British standard BS EN ISO 591-1-2000 for titanium dioxide pigments for paints. Please refer to [Appendix A2.6 - Standards of Titanium Dioxide](#).

Appendix reference:

[Appendix A2.6 - Standards of Titanium Dioxide](#)

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

Henan Billions is a member of is a member of China National Coatings Industry Association (CNCIA). Please refer to [Appendix A2.7 - Certificate of Members of CNCIA](#).

Appendix reference:

[Appendix A2.7 - Certificate of Members of CNCIA](#)

A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) and legal persons (e.g. companies) are associated where they meet the definition of 'related persons' in Regulation 128 of the [Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

1. Please complete **annex Section A3 – Organisational structure** of **Annex II** for your company's worldwide corporate structure and affiliations.
2. Please explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure, all sites/locations and departments which are involved in the production, sale, R&D, supply and distribution of the like goods or goods concerned.

Henan Billions completes [Annex II A3 - Organisational Structure](#).



Henan Billions provides a diagram showing the internal hierarchical and organisational structure. Please refer to [Appendix A3.2 - Internal Hierarchical and Organisational Structure](#).

Appendix reference:
[Annex II A3 - Organisational Structure](#)
[Appendix A3.2 - Internal Hierarchical and Organisational Structure](#)

3. Please explain any changes to your company structure or associations during the injury period (1 January 2022 – 31 December 2025).

Henan Billions provides a table to present the changes. Please refer to [Appendix A2.3 - Changes in the Legal Form](#).

Appendix reference:
[Appendix A2.3 - Changes in the Legal Form](#).

4. If your company is part of a group (e.g. parent company with subsidiaries, joint-ventures, common ownership):
- 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 or goods concerned, 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)?

Henan Billions provides a diagram showing the complete ownership structure of whole group companies. Please refer to [Appendix A3.4 - Ownership Structure of Whole Group](#).

Within the group, there are 5 producers (including Henan Billions itself) and 2 traders of product concerned.

The 5 producers in the group are:

- LB Group Co., Ltd.
- Henan Billions Advanced Material Co., Ltd. ("Henan Billions")
- LB Lufeng Titanium Industry Co., Ltd. ("LB Lufeng")
- LB Sichuan Titanium Industry Co., Ltd. ("LB Sichuan")
- LB Xiangyang Titanium Industry Co., Ltd. ("LB Xiangyang")



The 5 producers, located in mainland China, produce the TiO₂ and sell the product in the domestic market and foreign market. Each producer manufactures TiO₂ either by sulphate method or chloride method. Three producers only use sulphate method: LB Group, LB Sichuan and LB Xianyang. Two producers only use chloride method: Henan Billions and LB Lufeng.

The 2 traders in the group are:

- Billions (Hong Kong) Corporation Limited (“BHK”)
- Billions Europe Ltd. (“BEL”)

The 2 traders purchase the TiO₂ from above related 5 producers and export the product to different foreign markets, including UK.

All the related companies involved in the production or sales of the goods concerned are marked in the diagram.

Appendix reference:

[Appendix A3.4 - Ownership Structure of Whole Group](#)

5. State if any of the production locations closed during the injury period.

None of the production location closed 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.

Henan Billions is not listed on the stock exchange. Its shareholder, LB Group, is listed on the Shenzhen Stock Exchange. The date of listing is September 30, 2021. The stock code is SZ 002601.

Appendix reference: N/A



2. Please complete **Section A4 – Owners and shareholders of Annex II** for:
 - a. all your company's shareholders that owned more than 5% of its shares during the POI.
 - b. the Board of Directors during the period of investigation (POI)
3. Explain your procedure for appointing the members of the Board of Directors.

Henan Billions completes Annex II A4 - Owners & Shareholders.

According to the articles of association, the members of the Board of Directors are appointed by [Redacted – Commercially sensitive information relating to shareholder governance arrangements, including voting rights, board composition, director nomination rights and remuneration].

Appendix reference:

**Annex II A4 - Owners & Shareholders
Appendix A2.4.1 - Articles of Association**

A5 Operational links with other companies or persons

1. Complete the table below if your company has established long term agreements or relationships with any company/companies located in the UK, the PRC, or in third countries for the production (e.g. sub-contracting), supply and sale of the like goods, or other licensing, technical patent or compensatory agreements.

If your company has long-term agreements with other companies/persons for the supply of goods destined for internal sale, e.g. captive use, please provide the contract to demonstrate this.

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix number of contract	Length of Agreement
N/A	N/A	N/A	N/A	N/A
Appendix reference: N/A				

+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, explain how the prices of the internal sales have been determined.

Not applicable. Henan Billions [Redacted – Commercially sensitive information].

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.

The accounting standards adopted by Henan Billions is the People's Republic of China Generally Accepted Accounting Principles (PRC GAAP). The accounting practices of Henan Billions is the same as the generally accepted accounting principles in China.

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.

No changes have occurred with respect to accounting practices.

Appendix reference: **N/A**

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

Records address	What records are held?
[Redacted – Address]	All the accounting records are held at this address.



--	--

+Add additional rows as required



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

The financial year is 1 January – 31 December. There has been no change with respect to this period or in accounting practices over the last four financial years.

Appendix reference: **N/A**

5. Has your accounting period changed during between 1 January 2022 and 31 December 2025? If yes, describe these changes.

The accounting period has not changed between 1 January 2022 and 31 December 2025.

Appendix reference: **N/A**

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

Henan Billions provides the copies of audited financial statements covering the whole injury period except year 2025. The audited report for year 2025 has not been completed yet. Henan Billions will provide it once ready Please refer to [Appendix A6.6 - Audited Financial Statements of Henan Billions](#).

The associated parties involved in the production and sales of the goods concerned have submitted their own responses separately. Their audited financial statements are attached in their responses.

Appendix reference:

[Appendix A6.6 - Audited Financial Statements of Henan Billions](#)

7. If your financial statements are unaudited, please attach a copy of your unaudited financial statements for the injury period and explain why the accounts are unaudited.

Not applicable. The financial statements of Henan Billions are audited.



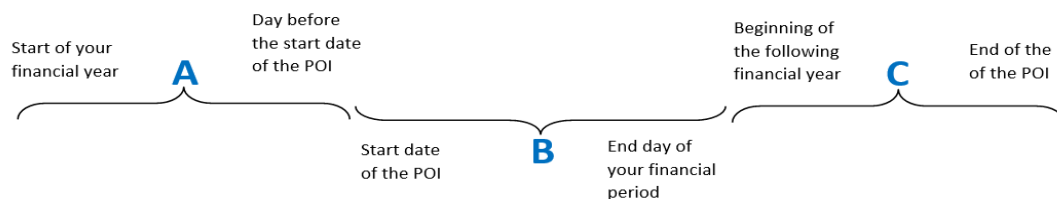
Appendix reference:

Appendix A6.6 - Audited Financial Statements of Henan Billions

8. 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.



Henan Billions provides the trial balance covering the POI. The financial year is fully aligned with the POI. Please refer to [Appendix A6.8 - Trial Balance of Henan Billions](#).

Appendix reference:

Appendix A6.8 - Trial Balance of Henan Billions

9. For your company and any associated parties involved in the production, marketing or sales of the goods concerned, please attach copies of relevant management reports (e.g. profit and loss statement) for the profit centre that includes the goods and like goods. Please provide these reports for the (i) POI and (ii) most recently completed financial year.

Not applicable.

Appendix reference:

N/A



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

Henan Billions is part of a group companies. [Redacted – Commercially sensitive information].

Appendix reference: **N/A**

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

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

The accounting system of Henan Billions is [Redacted – Confidential information].

When performing a sale, the accounting records used for revenue are booked as below:

Debit: [Redacted – Commercially sensitive information]

Credit: [Redacted – Commercially sensitive information]

At the same time, [Redacted – Commercially sensitive information relating to accounting]:

Debit: [Redacted – Commercially sensitive information]

Credit: [Redacted – Commercially sensitive information]

When the company receives payment, the following entries shall be performed:

Debit: [Redacted – Commercially sensitive information]

Credit: [Redacted – Commercially sensitive information]

For the production cost, the production department [Redacted – Commercially sensitive information relating to production records and cost calculation].

Henan Billions provides the chart of accounts. Please refer to Appendix A6.11 - Chart of Accounts.



Appendix reference:

Appendix A6.11 - Chart of Accounts

12. Have you changed your financial policies and/or accounting systems during the injury period? Please explain the changes, including dates and the reasons for those changes along with the financial impact of those changes on the goods concerned or like goods.

During the injury period, Henan Billions changed its accounting systems. Before the year [Redacted – Date], Henan Billions used an accounting system named [Redacted – Confidential information]. Since [Redacted – Date], Henan Billions has started using [Redacted – Confidential information]

The company considers that, [Redacted – Confidential information].

The change of accounting system does not impact the accounting standards and accounting practices adopted by Henan Billions. Thus, this change does not impact the goods concerned.

Appendix reference: **N/A**

A7 Your company's products

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

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

Supply any evidence you have that is relevant.

Henan Billions completes **Annex II A7.1 - Your Company's Products**. In A7.1, Henan Billions provides the production method and rutile titanium dioxide content per weight of each product code.

These two characteristics are described in the product brochure. Please refer to **Appendix A7.3 - Product Brochure**.

Appendix reference:

Annex II A7.1 - Your Company's Products

Appendix A7.3 - Product Brochure of Whole Group



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

Henan Billions uses the same product codes across production, sales and invoicing.

Appendix reference: **N/A**

3. If there are differences in characteristics between your range of goods concerned and your like goods which cause distinguishable differences in price, explain those differences and the effect they have.

Supply any relevant evidence , this could take the form of sales brochures, input costs, research papers or any other relevant documentation.

For the same product code, the characteristics of the product are the same regardless of the markets sold.

The description and characteristics of each product code are described in the product brochure. Please refer to Appendix A7.3 - Product Brochure of Whole Group. The brochure includes all the product codes produced and sold by all 5 producers within the group.

Appendix reference:

Appendix A7.3 - Product Brochure of Whole Group

4. In relation to the technical, physical and other relevant factors, how are the products you export different from those produced in the UK. Please provide a general explanation here and complete the relevant sections of **Section A7.1 – Your company’s products, Annex II** where possible.

Henan Billions completes Annex II A7.1 - Your Company's Products.

Appendix reference:

Annex II A7.1 - Your Company's Products

5. For each type of the like goods sold on your domestic market and the goods concerned destined for consumption on the UK market, please provide a technical description as well as translated sales brochures. Please also provide information on:
- technical characteristics



- physical characteristics
- any other important factors.

The description and characteristics of each product code are described in the product brochure. Please refer to [Appendix A7.3 - Product Brochure of Whole Group](#). The brochure includes all the product codes produced and sold by all 5 producers within the group.

Appendix reference:
[Appendix A7.3 - Product Brochure of Whole Group](#)

6. Describe all other goods produced or sold by your company in the UK, providing a name and description. If appropriate, please group them by type/range. Please complete **Section A7.2 – Other goods, Annex II**.

Not applicable. Henan Billions does not sell any other goods in the UK.

7. If you produce and/or sell other goods for the UK market other than the goods concerned, please complete the "Other goods" tab in Annex I.

Henan Billions completes [Annex II A7.2 - Other Goods](#). Henan Billions reports the data based on the products recorded in the account [Redacted – Confidential information]. The other goods are [Redacted – list of products]. None of them are exported to UK.

[Redacted – Confidential information] are the by-products of the production of TiO₂. [Redacted – Commercially sensitive details as to the company's business concerning by-products].

[Redacted – Confidential information] is the raw material of the production of chloride TiO₂. [Redacted – Commercially sensitive details as to the company's business concerning this raw material].

[Redacted – Confidential information] is the output of one production step and input of the next steps of Chloride Method. Henan Billions produces the [Redacted – Confidential information]. With this material, [Redacted – Commercially sensitive details as to the company's business concerning this raw material].

Appendix reference:
[Annex II A7.2 - Other Goods](#)



8. If you sell goods concerned that are used in the production of ink, please list the relevant model numbers.

Henan Billions provides the document describing all the TiO₂ produced and sold by all 5 producers within the group. It distinguishes the production method, the relevant producer and the application of ink for each type of product. Please refer to [Appendix A7.8 - Product List of Whole Group](#).

Appendix reference:

[Appendix A7.8 - Product List of Whole Group](#)



SECTION B: Sales

Please coordinate the responses to each of the relevant sections in this questionnaire with your associated companies and ensure that the sales information for your associated companies to independent customers reconciles fully with the information given.

B1 Sales

1. Please complete **Section B1.1 – Upwards sales reconciliation, Annex II.**

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

Henan Billions completes Annex II B1.1 - Upward Sales Reconciliation.
--

Appendix reference:

Annex II B1.1 - Upward Sales Reconciliation
--

B2 Captive sales

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

Not applicable. [Redacted – Confidential information].

Appendix reference: N/A
--

B3 Sales

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

Henan Billions provides a flowchart describing the channels of distribution of the whole group. Please refer to Appendix B3.1 - Channels of Distribution of Whole Group.



For the export sales to the UK, there were [Redacted – commercially sensitive information] channels of distribution during the POI:

[Redacted – Details on channels of distribution for the export sales to the UK during the POI]

For the domestic sales, [Redacted – commercially sensitive information] of distribution during the POI, as follows:

[Redacted – Details on channels of distribution for the domestic sales during the POI]

Appendix reference:

Appendix B3.1 - Channels of Distribution of Whole Group

2. Please explain how you have categorised customers in your sales data, highlighting any differences between the domestic market and exports to the UK.

In the accounting records, Henan Billions distinguishes the sales to related parties and unrelated parties.

Appendix reference: **N/A**

3. Please provide your terms of sale and pricing to each customer category (e.g., traders, distributors, wholesalers, industrial users, end users, etc.) including associated companies.

The sales team negotiates the terms of sales and price of the product with the customer transaction by transaction. Hence, there is no difference in pricing based on the customer category for unrelated sales.

Appendix reference: **N/A**

4. Describe each step in the sales negotiation process, from the first contact with the customer up to and including any after-sale price adjustments (commissions, discounts, rebates and allowances). Please include a description of how the process varies for different customer categories.



The sales negotiation process for exports to the UK is provided below:

[Redacted – Details on the different steps in the sales negotiation process for exports to the UK and a description regarding variations according to different customer categories]

The sales negotiation process for domestic sales is provided below:

[Redacted – Details on the different steps in the sales negotiation process for domestic sales].

Appendix reference: **N/A**

5. Please describe in detail how the contracts, prices and quantities are agreed in accordance with sales made in long or short-term contracts. Describe the types of contracts applicable to the goods concerned, including the terms, price changes and renegotiation by either side, etc. Explain the requirements on either party, should the contract be terminated early.

Export sales to UK are made pursuant to [Redacted – Confidential information]. The negotiation process is described above. [Redacted – Confidential information regarding the sales negotiation process.]

Similar to export sales, the domestic sales are also made pursuant to [Redacted – Confidential information]. The negotiation process is described above. [Redacted – Confidential information regarding the sales negotiation process].

Appendix reference: **N/A**

6. Please explain production scheduling, such as whether production begins after the customers have established their product specifications (contract/order) and the sale has been made, or according to normal company production schedules.

The company arranges production [Redacted – Confidential information].

Appendix reference: **N/A**



7. Provide copies of all price lists applicable during the POI for all customer types in the UK, including those used by associated companies. Explain your pricing procedure and whether sales prices differ between or among grades, types or specifications of the goods concerned or among customers, regions or time periods.

[Redacted – commercially sensitive information].

Appendix reference: **N/A**

8. For all sales through associated companies, please provide a detailed description of how sales are made, detailing the procedure followed between time of order and delivery to the first independent customer. Please explain how the invoicing and payments are made.

Henan Billions's exports to UK through associate companies are provided below:

[Redacted – Confidential information regarding the sales negotiation process].

Appendix reference: **N/A**

9. When establishing the date of sale, what is your revenue recognition policy?

For the export sales, Henan Billions considers the date of [Redacted – Confidential information].

Generally, [Redacted – Confidential information]. And then Henan Billions issues the [Redacted – Confidential information]. Based on [Redacted – Confidential information] the company recognizes [Redacted – Confidential information].

For the domestic sales, Henan Billions considers the [Redacted – Confidential information].

Generally, [Redacted – Confidential information]. And then Henan Billions issues [Redacted – Confidential information]. Based on the [Redacted – Confidential information], the company recognizes [Redacted – Confidential information].

Appendix reference: **N/A**



10. Describe your company's channels of distribution (how a good goes from production to the end consumer involving intermediaries like wholesalers, retailers, distributors, etc).

Highlight any differences between the domestic market and exports to the UK.

Henan Billions provides a flowchart describing the channels of distribution of the whole group. Please refer to [Appendix B3.1 - Channels of Distribution of Whole Group](#).

For the export sales to the UK, there were [Redacted – commercially sensitive information] channels of distribution during the POI:

[Redacted – Details on channels of distribution for the export sales to the UK during the POI]

As shown above, Henan Billions involves [Redacted – Confidential information].

For the domestic sales, [Redacted – commercially sensitive information] of distribution during the POI, as follows:

[Redacted – Details on channels of distribution for the domestic sales during the POI]

Appendix reference:

[Appendix B3.1 - Channels of Distribution of Whole Group](#)



B4 Sales Transactions

B4.1 UK Sales

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

1. Please provide the sales information for your company's sales to all customers in the UK in **Section B3 – Sales to the UK, Annex II**. For instructions on filling out and explaining the adjustments for sales to the UK, please see **Section C**, subsection **C1 – Adjustments for export sales to the UK**.
 - Report each good sold on a given invoice with a different PCN (see Section A on Product Control Numbers) or invoice line, as a separate transaction. If there are any other sales costs, charges or expenses incurred which have not been identified in the table above, add a column for each item (see 'other factors'). For example, other particular selling expenses incurred.

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

2. We need to know the exchange rate for the sales of your goods concerned in the UK during 1 January 2025 – 31 December 2025 to compare these to the domestic sales of the like goods.

What currency do you use to invoice your UK customers of the goods concerned?

If you don't use your local currency, can you specify the source of the exchange rates (e.g. Bank of England)?

Henan Billions completes [Annex II B3 - Sales to the UK](#) and supporting spreadsheet for the UK sales adjustments calculation, [Annex II B3.1 - Adjustments for UK Sales](#).

Henan Billions uses USD or EUR to invoice UK customers. The local currency / accounting currency of Henan Billions is CNY. To convert the invoice currency to accounting currency, Henan Billions uses the exchange rates published by the Bank of China on the day that the company records the transaction as income in the account.



The exchange rate used for each UK transaction is provided in [Annex II B3 - Sales to the UK](#).

Appendix reference:

[Annex II B3 - Sales to the UK](#)

[Annex II B3.1 - Adjustments for UK Sales](#)



3. If your sales have not been made on a CIF basis, explain below how you have calculated the CIF values included in the 'CIF value in accounting currency' column in **Section B - Sales to the UK, Annex II**.

As shown in Annex II B3, UK sales are made on [Redacted – commercially sensitive information] Henan Billions [Redacted – commercially sensitive sales methodology].

All the calculation formulas are presented in Annex II B3 and Annex II B3.1.

Appendix reference:

Annex II B3 - Sales to the UK

Annex II B3.1 - Adjustments for UK Sales

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

[Redacted - commercially sensitive information as to whether any cost incurred by associated companies was paid or reimbursed].

Appendix reference: **N/A**

5. Select the largest invoice by value from two different UK customers of the goods concerned during 1 January 2025 – 31 December 2025. Provide a complete set of documents for these sales. For example:

- purchase order and order acceptance,
- commercial invoice and packing list,
- applicable discounts or rebates,
- credit/debit notes,
- contract of sale,
- invoices for land transport,
- inland invoices for port handling and other export charges,
- proof of payment, remittance advice and accounts receivable ledger, country of origin certificates (if applicable),
- invoices for ocean freight and marine insurance (if applicable), and
- details of any tax rebates (if applicable).



On each document provided, specify which of the two transactions listed in the "Sales to the UK" tab they relate to and cross-reference the invoice to which it relates to.

Henan Billions provides complete sets of two transactions. Please refer to Appendix B4.1.5 - Documents of Export Sales to UK.

Appendix reference:

Appendix B4.1.5 - Documents of Export Sales to UK

B4.2 Domestic sales

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

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

Report each goods sale on a given invoice with a different PCN (see Section A on Product Control Numbers) or invoice line as a separate transaction.

If there are any other sales costs, charges or expenses incurred which have not been identified in the table above, add a column for each item (see 'other factors'). For example, other particular selling expenses incurred.

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

2. Please provide a high-level overview of how the sales and delivery processes for domestic sales of like goods works.

Henan Billions completes Annex II B4 - Domestic Sales, and supporting spreadsheet for domestic sales adjustments calculation, Annex II B4.1 - Adjustments for Domestic Sales.

In the domestic market, Henan Billions sold the product [Redacted – commercially sensitive information]. In most cases, Henan Billions, [Redacted – commercially sensitive information on the sales and delivery processes for domestic sales].

Appendix reference:

Annex II B4 - Domestic Sales



Annex II B4.1 - Adjustments for Domestic Sales

3. Provide a narrative to support the data that you have supplied in the columns under the heading “Adjustments” in the **"Domestic sales"** tab in **Annex I**.

Henan Billions claims domestic transportation cost as adjustment for the domestic sales. The transportation cost of the domestic sales [Redacted – commercially sensitive information] The company allocates [Redacted – commercially sensitive transportation cost allocation methodology]. Then, the company allocates [Redacted – commercially sensitive information] The transportation cost is recorded in the account [Redacted – confidential information].

All the calculation is presented in Annex II B4 - Domestic Sales, and Annex II B4.1 - Adjustments for Domestic Sales.

Appendix reference:

Annex II B4 - Domestic Sales

Annex II B4.1 - Adjustments for Domestic Sales



4. Supply copies of all price lists applicable between 1 January 2025 and 31 December 2025 for all customer types in your domestic market, including those used by associated parties. Explain your pricing policy and whether sales prices differ between or among grades, types or specifications of the goods concerned or among customers, regions or time periods.

The company [Redacted – commercially sensitive information].

Appendix reference: **N/A**

5. Select the largest invoice by value from two different customers in your domestic market of the like goods during the period 1 January 2025 – 31 December 2025.

Supply a complete set of documents for these sales:

- purchase order and order acceptance,
- commercial invoice and packing list,
- applicable discounts or rebates,
- credit/debit notes,
- contract of sale,
- inland freight contract,
- invoices for land transport,
- invoices for port handling and other domestic shipping costs,
- proof of payment, remittance advice and accounts receivable ledger, country of origin certificates (if applicable),
- invoices for ocean freight and marine insurance (if applicable), and
- details of any tax rebates (if applicable).

On each document provided, please specify which of the two transactions listed in the "**Domestic sales**" tab in **Annex I**, they relate to and cross-reference the invoice to which it relates.

Henan Billions provides complete sets of two transactions. Please refer to Appendix B4.2.5 - Documents of Domestic Sales.

Appendix reference:

Appendix B4.2.5 - Documents of Domestic Sales

B5 Sales to third countries



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

Henan Billions completes [Annex II B6 - Export sales to third countries](#).

Appendix reference:

[Annex II B6 - Export sales to third countries](#)

SECTION C: Fair comparison

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

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

This section is divided into subsections **C1 – Adjustments on export** and **C2 – Adjustments on domestic sales**. Please complete those questions that relate to adjustments you wish to claim and report all charges in your accounting currency.

C1 Adjustments on export sales

Adjustments should be made for each transaction in the relevant columns of the transaction-by-transaction lists requested in **Section B3 – Sales to the UK of Annex II**. The following questions relate to the adjustments provided in this annex. If they are not applicable then please state this in the relevant box.

1. Please detail your policy for granting discounts and rebates to customers in the UK and to third countries.

Henan Billions [Redacted – commercially sensitive information concerning credit notes and discounts].

Appendix reference: [N/A](#)



2. If discounts or rebates vary by customer category, please explain separately the discounts and rebates given to each category.

Henan [Redacted – commercially sensitive information concerning credit notes and discounts].

Appendix reference: **N/A**



3. Please explain how you have quantified each of the charges included under transportation, insurance, handling, loading and ancillary costs. Identify the general ledger account(s) where each expense is recorded.

The exports to the UK are made on [Redacted – commercially sensitive information] basis. Henan Billions reports [Redacted – Commercially sensitive information relating to export-related cost adjustments.]

1) Inland Freight

The inland freight is the freight cost from the factory to the Chinese loading port. The inland freight [Redacted – Commercially sensitive information relating to internal commercial arrangements.]

The inland freight related to export sales is recorded in the [Redacted – confidential information]

2) Port Charges

The port charges are [Redacted – Commercially sensitive information relating to internal commercial arrangements.]

The port charges are recorded in the account [Redacted – confidential information].

3) Ocean Freight

The ocean freight is [Redacted – Commercially sensitive information relating to internal commercial arrangements.]

The ocean freight is recorded in the account [Redacted – confidential information].

4) Ocean Insurance

The ocean insurance [Redacted – Commercially sensitive information relating to insurance costs and arrangements.]

The ocean insurance is recorded in the account [Redacted – confidential information].



The detailed calculations of above charges are reported in [Annex II B3 - Sales to the UK](#) and [Annex II B3.1 - Adjustments for UK Sales](#). Also, the supporting documents of the charges, i.e., [Redacted – Commercially sensitive supporting documentation relating to reported expenses] are provided in [Appendix B4.1.5 - Documents of Export Sales to UK](#).

Appendix reference:

[Annex II B3 - Sales to the UK](#)

[Annex II B3.1 - Adjustments for UK Sales](#)

[Appendix B4.1.5 - Documents of Export Sales to UK](#)

4. For the purposes of this questionnaire, credit is the cost of the time the buyer is given to pay for the good and typically agreed in the terms of payment. We adjust the export price when credit terms for export sales differ from the credit terms for domestic sales, even if funds are not borrowed to finance the accounts receivable. Please answer the following questions regarding credit terms:

- a) Do you provide credit to your UK customers of the goods concerned?

If yes: Do you provide a rolling credit facility to your UK customers (e.g. you don't agree specific payment terms at the time of the sale)

The company [Redacted – commercially sensitive information concerning credit notes and discounts]

Appendix reference: [N/A](#)

- b) Do your UK customers pay into a foreign currency account.

If yes: Do you have short term borrowings or an overdraft arrangement in the same currency? What is the monthly average interest rate? How is the interest rate decided?

The UK customers pay into a foreign currency account. Henan Billions [Redacted – commercially sensitive information]. All foreign currency will be converted into the accounting currency, i.e. RMB. Therefore, in the calculation of credit expense, Henan Billions uses the benchmark interest rate for short term loan, one-year Loan Prime Rate (LPR), published by the People's Bank of China on the first month of the POI. Henan Billions provides the screenshot of



the website of the People's Bank of China. Please refer to [Appendix C1.4 - Supporting Document for LPR](#).

Appendix reference:
[Appendix C1.4 - Supporting Document for LPR](#)

- c) Describe your methodology for calculating credit costs, including the interest rate you used for calculating the granting of credit on sales.

[Redacted – details as to the methodology used by the company to calculate credit costs for the purposes of this investigation].

Henan Billions uses the benchmark interest rate for short term loan, one-year Loan Prime Rate (LPR), published by the People's Bank of China on the first month of the POI. Please refer to [Appendix C1.4 - Supporting Document for LPR](#).

The detailed calculations are reported in [Redacted – confidential information]

Appendix reference:
[Appendix C1.4 - Supporting Document for LPR](#)

5. For import charges adjustments, provide original and English language translations of statutes and regulations authorising duty drawback on exported goods and the governing methods used to calculate duty drawback.

Henan Billions [Redacted – commercially sensitive information regarding import charges].

Appendix reference: [N/A](#)

6. Explain the method you used to connect the duty drawback amount to the specific UK sale and to third country sales.

There is no duty drawback for export sales of TiO₂.

Appendix reference: [N/A](#)

7. Clarify the association between the amount received from the government when you export, and the amount paid for imported materials.

Henan Billions does not receive any amount from the government when it exports TiO₂ or imports materials.



Appendix reference: **N/A**

8. List all indirect taxes imposed on the goods sold in the domestic market which were either rebated or not collected on the goods exported to the UK and to third countries.

There are no such indirect taxes which were either rebated or not collected on the goods exported to foreign markets.

Appendix reference: **N/A**

C2 Adjustments on domestic sales

Adjustments are to be made for each transaction in the relevant columns of the transaction-by-transaction lists requested in **Section B4 – Domestic sales, Annex II**. All adjustments must be reported in your accounting currency.



1. Please describe in detail your policy for granting discounts and rebates to customers in your country.

Henan Billions [Redacted – commercially sensitive information concerning credit notes and discounts].

Appendix reference: **N/A**

2. If discounts or rebates vary by customer category, please explain separately the discounts and rebates given to each category.

Henan Billions [Redacted – commercially sensitive information concerning credit notes and discounts].

Appendix reference: **N/A**

3. Please explain how you have quantified each of the charges included under domestic freight. Identify the general ledger account(s) where each expense is recorded.

Henan Billions [Redacted – commercially sensitive information] So, Henan Billions reports [Redacted – commercially sensitive information] accordingly. The [Redacted – commercially sensitive information related to domestic freight]. There is [Redacted – commercially sensitive details regarding domestic freight].

Therefore, Henan Billions uses [Redacted – commercially sensitive information related to methodology to calculate domestic freight] in Annex II B4.

The [Redacted – commercially sensitive information] related to domestic sales is recorded in the account [Redacted – confidential information].

The detailed calculations of above charges are reported in Annex II B4 - Domestic Sales and Annex II B4.1 - Adjustments for Domestic Sales.

Appendix reference:

Annex II B4 - Domestic Sales

Annex II B4.1 - Adjustments for Domestic Sales



4. An adjustment can be made to take account of differences in physical characteristics between the goods sold in the UK and similar types sold in the domestic market.

Please provide a full explanation of each difference identified.

For goods with the same product code, the physical characteristics are the same, regardless of the markets on which they are sold.

Appendix reference: N/A



5. An adjustment can be made for differences in levels of trade where the export price (including a constructed export price) is:
- at a different level of trade from the normal value; and
 - the difference has affected price comparability.

Please explain how you have calculated any adjustment.

Not applicable. There is no such difference.

Appendix reference: **N/A**

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

Not applicable. Henan Billions does not claim the packing cost as an adjustment in the sales. [Redacted – commercially sensitive information regarding packing costs].

Appendix reference: **N/A**

7. For adjustments for import charges please do the following:

- Provide original and English translations of statutes and regulations authorising duty drawback on exported goods and the governing methods used to calculate duty drawback.

There is no duty drawback for export sales of TiO₂.

Appendix reference: **N/A**

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

There is no duty drawback for export sales of TiO₂.

Appendix reference: **N/A**



9. Please explain the association between the amount received from the government when you export, and the amount paid for imported materials.

Henan Billions does not receive any amount from the government when it exports TiO2 or imports materials.

Appendix reference: **N/A**

10. List all indirect taxes imposed on the products sold in the domestic market which were either rebated upon exportation or not collected on the products exported to the UK and to third countries.

The value added tax (VAT) rate of TiO2 is 13%. There are no such indirect taxes which were either rebated or not collected on the goods exported to foreign markets.

Appendix reference: **N/A**

- For each tax listed above, provide English translations of statutes and regulations authorising the collection of the tax, including documents explaining the method of calculation, assessment, and payment of the tax.

The value added tax (VAT) rate of TiO2 is 13%. There are no such indirect taxes which were either rebated or not collected on the goods exported to foreign markets.

Appendix reference: **N/A**

- For each tax listed above, separately provide information on the tax base or taxable price, the tax rate, the amount of taxes assessed, any deductions or offsets to the tax and the formula used to calculate the tax amount.

The value added tax (VAT) rate of TiO2 is 13%. There are no such indirect taxes which were either rebated or not collected on the goods exported to foreign markets.

Appendix reference: **N/A**

- Specify when you are legally obligated or liable for tax payment. Report when you actually paid taxes and whether you maintain separate accounts for these taxes.



Henan Billions paid VAT on purchases of raw materials, energy and others. All the VAT paid amount is recorded in the account 2221020000- Payable Taxes - Unpaid Value Added Tax.

Appendix reference: **N/A**

11. Credit refers to the cost of the time the buyer is given to pay for the goods, as typically agreed in the terms of payment. An adjustment is warranted when credit terms for export sales differ from the credit terms for domestic sales. A credit adjustment is to be made even if funds are not borrowed to finance the accounts receivable.

Please explain how the interest rates are decided and the basis on which they are used.

To calculate the credit cost, Henan Billions uses the benchmark interest rate for short term loan, one-year Loan Prime Rate (LPR), published by the People's Bank of China. Henan Billions provides the screenshot of the website of the People's Bank of China. Please refer to [Appendix C1.4 - Supporting Document for LPR](#).

The credit cost is calculated as follows:

[Redacted – commercially sensitive information].

The detailed calculations are reported in [Annex II B4 - Domestic Sales](#).

Appendix reference:
[Appendix C1.4 - Supporting Document for LPR](#)
[Annex II B4 - Domestic Sales](#)

12. Please provide, for any after sales costs adjustment reported, the relevant sales contracts and how you calculated the expenses (for example, 'Warranty and Guarantee expenses' and 'Technical assistance and other services'), including the basis of any allocations. Include a record of expenses incurred. Technical services include costs for service, repair, or consultation. Where these expenses are closely related to the sales in question, an adjustment will be considered. Identify the ledger account where the expense is located.

Not applicable. There is no such cost.

Appendix reference: **N/A**



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

Not applicable. There is no commission.

Appendix reference: **N/A**

14. If an adjustment has been included for other factors not provided for above please provide a description of the adjustment, an explanation of why it has been included and the basis of its calculation.

There is no other factor.

Appendix reference: **N/A**



SECTION D: Costs and performance

This section is about the costs to make and sell your goods concerned and like goods.

We use this information to assess whether there are any differences between the costs to produce and sell the goods concerned and the like goods. Where we determine that it is not appropriate to use the actual prices of your domestic sales during the POI (the comparable price), we may use the information on the costs of production and sale as the basis for constructing normal value.

We also ask you about your company's performance (turnover and statement of profit and loss and other comprehensive income).

D1 Turnover

1. Please complete **Section D – Costing Information**, subsection **D1 – Turnover**, **Annex II** by reporting your total sales after all discounts and excluding taxes, for the injury period.
 - If your company accounts are consolidated with accounts of associated companies, create a copy of the table to report **total group** turnover.
 - The total turnover must reconcile with the turnover in your financial reporting (accounts).

Henan Billions completes Annex II D1 - Turnover. The account of Henan Billions is independent and not consolidated with associated companies.

Appendix reference:

Annex II D1 - Turnover

D2 Statement of profit and loss and other comprehensive income

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



Henan Billions completes Annex II D2 - Income Statement.

Henan Billions provides income tax declarations and Value Added Tax declarations. Please refer to Appendix D2.2.1 - Corporate Income Tax Declarations and Appendix D2.2.2 - Value Added Tax Declarations.

The corporate income tax declaration [Redacted – confidential information]

Appendix reference:
Annex II D2 - Income Statement
Appendix D2.2.1 - Corporate Income Tax Statements
Appendix D2.2.2 - Value Added Tax Declarations.

D3 Production

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

Henan Billions uses the chloride method to produce TiO₂. The production facilities are located at the address of the company. [Redacted – commercially sensitive information].

Appendix reference: **N/A**

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

Henan Billions provides the flowchart of the production process. Please refer to Appendix D3.2 - Production Process.

Appendix reference:
Appendix D3.2 - Production Process

3. Describe the main inputs to the production process and whether the supplier is associated or not. Specify whether these input materials or parts were imported, and whether the input value includes import charges and indirect taxes (for both exported and domestic types).



The main inputs are ilmenite and synthetic rutile. The relationship with suppliers and origin of the inputs are as follows:

Ilmenite: [Redacted – commercially sensitive information].

Synthetic rutile: [Redacted – commercially sensitive information].

The indirect taxes are not included in the input value.

Appendix reference: N/A

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

The production line [Redacted – commercially sensitive information relating to produced products].

Appendix reference: N/A



5. Can you describe how your company determines the:

- Overall production volume for all products
- Quantity produced for each specific product.

What factors contribute to these decisions?

The company plans the [Redacted – commercially sensitive information on production volume].

Appendix reference: **N/A**

D4 Upwards cost reconciliation

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

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

2. Do you use standard costing? If yes, then 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?

Henan Billions completes [Annex II D4 - Upwards Cost Reconciliation.](#)

Henan Billions [Redacted – commercially sensitive information on costs].

Appendix reference:

Annex II D4 - Upwards Cost Reconciliation

D5 Capacity

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

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

Henan Billions completes [Annex II D5 - Capacity.](#)



Appendix reference:
[Annex II D5 - Capacity](#)

2. If it is possible to alter your production facilities to increase production of the like goods and goods concerned by using the production capacity of other goods, how long would this take?

State how this would be done including an estimated cost of the process. If it may be difficult or not possible to convert production capacity, please explain why and provide supporting evidence.

[The production line \[Redacted – commercially sensitive information related to production\].](#)

Appendix reference: [N/A](#)

D6 Stocks

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

[Henan Billions completes Annex II D6 - Stocks.](#)

Appendix reference:
[Annex II D6 - Stocks](#)

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

[The market demand affects the stock level and trend.](#)

Appendix reference: [N/A](#)



D7 Joint products and by-products

1. Please explain any waste, scrap or by-products related to the production of the goods concerned and the like goods. Please explain:
 - how you differentiate your waste, scrap, and by-products.
 - what you do with your waste, scrap, and by-products.
 - how any income or cost from waste, scrap, and by-products is recorded
 - the average waste, scrap, and by-product ratio resulting from the production process of the goods concerned and like goods.

The major by-products are [Redacted – commercially sensitive information on by-products]. Henan Billions [Redacted – commercially sensitive information on by-products].

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.

No products share a joint process with the goods concerned. The production line only produces TiO₂.

Appendix reference: **N/A**

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

No products share a joint process with the goods concerned. The production line only produces TiO₂.

Appendix reference: **N/A**

D8 Purchases

1. Please complete **Section D8 – Purchases, Annex II**, showing purchases by total value exclusive of VAT and net of credit notes and trade discounts (discounts immediately deducted on the invoice) received from suppliers.



2. Within your company, do you use any integrated processes in the production of the goods concerned? If so, please explain.

Henan Billions completes [Annex II D8 - Purchases](#).

Henan Billions does not use any integrated processes in the production of the goods concerned.

Appendix reference:

[Annex II D8 - Purchases](#)

D9 Profitability

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

Henan Billions completes [Annex II D9 - Profitability](#). The profitability is calculated based on [Annex II D2 - Income Statement](#). The formula and calculations are provided in these two annexes.

Appendix reference:

[Annex II D9 – Profitability](#)

[Annex II D2 - Income Statement](#)

D10 Cost to make (CTM) in the PRC

1. Please provide the CTM for your domestic market, in the PRC, by completing **Section D10.1 – CTM in the PRC in annex II**.
 - Provide details for each PCN of your goods during the POI, produced by your company or an associated party.
 - Provide quarterly (3 monthly) costs for each PCN.
 - For each associated party, make a new copy and complete the spreadsheet annex separately.
 - Note that subheadings of each line item (e.g. raw materials, energy) can be changed to suit the categorisation of your own cost accounting system.



2. If there are differences in production costs for the same PCN between your like goods and the goods concerned, explain the reasons for the differences.

Henan Billions completes [Annex II D10.1 - CTM in the PRC](#).

Henan Billions has also submitted [Appendix D10 - Cost Methodology Explanation](#).

[Response to deficiency letter: Henan Billions added Appendix D10 to reconcile the method of production and the cost to make data.](#)

Appendix reference:

[Annex II D10.1 - CTM in the PRC](#)

[Appendix D10 - Cost Methodology Explanation](#)

3. Please state the cost allocation method for each cost subheading used to allocate costs against individual PCNs (e.g. units, tonnes, labour hours etc)

Henan Billions keeps records of [Redacted – commercially sensitive information on cost allocation] of each product code. The company [Redacted – commercially sensitive information on cost allocation]. Then, based on the product code, Henan Billions summarizes the cost to each PCN and reports in [Annex II D10.1 -CTM in the PRC](#).

Appendix reference:

[Annex II D10.1 - CTM in the PRC](#)

4. If your company incurred any extraordinary costs (such as start-up or ramp up costs) during the POI, please provide details of these costs, explaining why they were extraordinary and how they have been included and amortised in your accounts.

Henan Billions did not incur any extraordinary costs during the POI.

Appendix reference: **N/A**

5. Please explain how you finance your production of like goods, your sources of finance, whether there is any cost of finance associated with the production of like goods, and how you have reported this in the cost to make figures and company accounts.

The main business income supports the production and other costs.

Appendix reference: **N/A**



D11 AS&G in the PRC

1. Please provide AS&G costs for the like goods produced for your domestic market by completing **Section D – Costing information**, subsections **D11.1 – AS&G in domestic market**.
 - Provide details for each cost type of goods produced during the POI, by your company or an associated party.
 - Provide quarterly (3 monthly) expenses for each PCN.
 - Note that subheadings of each line item (e.g., sales commissions, supply and client) must be changed to suit the categorisation of your own cost accounting system.
2. Please explain the cost allocation and apportion method used for each cost type for the POI, including an explanation of that allocation and apportion method under each cost type.

Henan Billions completes [Annex II D11.1 - AS&G in domestic market](#). The company allocates the AS&G [Redacted – explanation on methodology]. The detailed allocation worksheet and AS&G details are provided in [Annex II D11.2.1 - Domestic Sale by Qty](#) and [Annex II D11.2.2 SG&A Allocation](#).

Appendix reference:

[Annex II D11.1 - AS&G in domestic market](#)

[Annex II D11.2.1 - Domestic Sale by Qty](#)

[Annex II D11.2.2 SG&A Allocation](#)

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

[There is no such difference.](#)

Appendix reference: [N/A](#)

D12 Raw material (RM) and major input purchases

1. Please complete **Section D12 – RM and input purchased, Annex II** detailing the RM and major input purchases accounting for >5% of the total cost to make and sell (>1% of energy for energy related costs) during the POI



Please provide an invoice and any supporting documents for two of your purchases stated within D12. Use the box below to give an overview of any supporting documents provided.

Henan Billions completes [Annex II D12 - RM and input purchased](#).
Henan Billions provides invoice for the purchases in D12. Please refer to [Appendix D12.1 - Purchase Invoices of RM and Input](#).

Appendix reference:

[Annex II D12 - RM and input purchased](#)
[Appendix D12.1 - Purchase Invoices of RM and Input](#)



2. If you purchase materials or inputs from associated suppliers, please provide information about how prices are set, the negotiation process on price setting; and any contracts or evidence of price negotiation. Also, in addition to the 'Cost to make (CTM)' sheets for Domestic sales (D10.1), please provide the cost to make of the material by the associated suppliers on the same basis by adding in a column to the 'raw materials and input purchases' sheet (D12), labelling it as 'Associated supplier CTM'.

Henan Billions purchases [Redacted – commercially sensitive information relating to the purchase of materials].

Appendix reference: **N/A**

3. For material costs purchased from independent companies, explain the nature of contractual arrangements. State whether the material costs include transportation charges, duties and other expenses normally associated with obtaining the materials used in production.

Henan Billions has [Redacted – commercially sensitive information relating to contractual arrangements].

Appendix reference: **N/A**

D13 Direct labour

1. Please complete **Annex D13 – Direct labour**, detailing the monthly direct labour costs per PCN for the like goods during the POI by your company.

Henan Billions completes Annex II D13 - Direct labour.

Appendix reference:
Annex II D13 - Direct labour

D14 Specificities regarding the PRC – Particular Market Situation (PMS)

For full details of the allegations, please refer to the [application](#). The TRA is investigating claims that distortions exist in the market for rutile titanium dioxide in the PRC.

Claims of distortions include:



- Raw material costs;
- Energy costs;
- Labour costs;
- Finance costs;
- Land costs;
- State Planning of the Economy;
- Tax costs;
- R&D costs;
- Distortions in the titanium dioxide (TiO₂) sector;
- Distortions in titanium feedstocks;
- Distortions in sulphuric acid;
- Distortions in chlorine and caustic soda;
- Distortions in coal;
- Distortions in petroleum coke;
- Distortions in iron scrap; and,
- Distortions in coal waste disposal.

Provide an explanation, plus any supporting evidence, for each allegation to show that these costs/prices are determined by open market conditions. Where costs/prices may be low please offer an explanation, plus any supporting evidence, of the cause under the appropriate subsections below.

If the TRA determines that a particular market situation existed during the period 1 January 2025 – 31 December 2025, the TRA must consider whether because of that particular market situation such sales do not permit a proper comparison between the like goods destined for consumption in the exporting country or territory and the goods concerned.

1. Please complete **Annex III - PMS**

In addition to the questions below, exporters should also complete Annex III and provide the requested evidence.

Henan Billions has completed Annex III and provided the requested evidence.

Henan Billions also refers to the comments filed by the LB GROUP on particular market situation, and incorporates them by reference to this Reply.

Appendix reference:

**Appendix D14.1 - LB GROUP's
comments on particular market
situation and representative country**



Raw material costs

1. The TRA is investigating the allegations of distortions within raw material costs for rutile titanium dioxide. Please refer to the [application](#) for full details of the allegation.

Please comment on these allegations and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of raw material costs related to the production (whether domestically or for export) of rutile titanium dioxide.

To the best of Henan Billions' knowledge, there are no government measures, policies, laws or directives that may have impacted costs of raw materials related to the production of rutile titanium dioxide. Henan Billions refers to its responses to specific questions below regarding respective raw materials and inputs.

Appendix reference: **N/A**

Energy costs

1. The TRA is investigating the allegations of distortions in energy costs for rutile titanium dioxide. Please refer to the [application](#) for full details of the allegation.

Please comment on these allegations and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of energy costs related to the production (whether domestically or for export) of rutile titanium dioxide.

Electricity

The Applicant essentially claims that electricity costs are distorted due to the alleged existence of price controls in electricity transmission and distribution.¹ Henan Billions notes that it purchases some of the electricity that it uses from related suppliers, and not from the allegedly distorted market. Thus, the alleged distortions do not exist with regard to those

¹ Application, Annex E.2.1., pages 26-27.



purchases. Henan Billions thus requests the TRA not to adjust those electricity costs.²

In any event, Henan Billions maintains that the prices of electricity are not artificially low. In this regard, Henan Billions' cost of purchasing electricity during the IP was CNY [Redacted – number: commercially sensitive price information whose disclosure would provide significant competitive advantage to competitors and which cannot be presented as a range] per kWh. During the same period, the cost of electricity in the United States, a country at a higher level of economic development, was less than CNY 0.62 per kWh. Thus, the fact that the cost incurred by Henan Billion was [Redacted – comparative term] the price in the United States underscores that Henan Billions' costs were not artificially low, and thus need not be adjusted.

Gas

The Application does not elaborate whether the Applicant considers the price of gas to be distorted, and what causes such distortion. In any event, Henan Billions notes that its cost of purchasing gas is higher than the average cost of natural gas imported into Mexico. Hence, the cost of natural gas incurred by Henan Billions is not artificially low and should thus not be adjusted.

Steam

Henan Billions considers that the cost of steam should not be adjusted.

First, Henan Billions only purchased steam from [Redacted – entity name]. Thus, given that the purchases were made in the context of an integrated structure, those purchases were not distorted by any alleged government interference.

Second, Henan Billions notes that the cost of steam is immaterial to the cost of producing rutile titanium dioxide to warrant an adjustment. In this context, Henan Billions notes that the cost of steam accounts for [Redacted – 0% - 5%] of the cost of energy incurred in the production of rutile titanium dioxide, and an even more minuscule proportion of the cost of producing rutile titanium dioxide. Thus, in line with the Statutory Guidance and previous TRA practice, Henan Billions requests the TRA not to adjust this cost.³

Response to deficiency letter:

² See also *Aluminium Extrusions from China*, Final Determination, para. 210.

³ Statutory Guidance on PMS Assessments; *Tin Mill Products from China*, Statement of Essential Facts, para. 109; *Tin Mill Products from China*, Final Determination, para. 174; *Biodiesel from China*, Final Determination, paras. 398, 409; *Aluminium Extrusions from China*, Final Determination, para. 168.



In response to the deficiency letter, Henan Billions has (i) explained why it is not possible to provide a range with regard to the price of electricity, and (ii) included a range with regard to the proportion of steam in the cost of energy.

Appendix reference:

Appendix D14.2 – Benchmarks for electricity

Appendix D14.3 – Benchmarks for gas

Labour costs

1. The TRA is investigating the allegations of distortions within labour costs for rutile titanium dioxide. Please refer to the [application](#) for full details of the allegation.

Please comment on these allegations and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of labour costs related to the production (whether domestically or for export) of rutile titanium dioxide.

To the best of Henan Billions' knowledge, there are no government measures, policies, laws or directives that may have impacted its labour costs incurred related to the production of rutile titanium dioxide.

In this context, Henan Billions also notes that, first, the cost of labour incurred by Henan Billions hour is [Redacted – comparative term] the cost incurred in a comparable country, Mexico; which demonstrates that Henan Billions' cost of labour is not artificially low. Therefore, Henan Billions requests the TRA not to adjust its cost of labour in the calculation of normal value as it does not prevent a proper comparison between the normal value and the export price.⁴

Second, Henan Billions notes that the cost of labour accounts for [Redacted – 0% - 5%] of the cost to make rutile titanium dioxide. Henan Billions considers that these labour costs are immaterial/insignificant to Henan

⁴ See also Tin Mill Products Investigation, Statement of Essential Facts, paras. 150 and 240; Tin Mill Products Investigation, Final Determination, para. 284; Certain Excavators Investigation, Final Determination, para. 394.



Billions' cost data. Thus, Henan Billions requests the TRA not to adjust these costs.⁵

Response to deficiency letter:

In response to the deficiency letter, Henan Billions has provided a range with regard to the proportion of the cost of labour.

Appendix reference:

Appendix D.14.4 – Benchmarks for labour

Finance costs

1. The TRA is investigating the allegations of preferential financial arrangements for producers of rutile titanium dioxide in PRC. Please refer to the [application](#) for full details of the allegation.

Please comment on these allegations and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of preferential financial arrangements related to the production (whether domestically or for export) of rutile titanium dioxide.

Henan Billions considers that no governmental measures have impacted its cost of finance.

In any event, Henan Billions considers that the contribution of finance costs to the AS&G costs is immaterial, and therefore request the TRA not to adjust those costs.⁶

Appendix reference: **N/A**

Land costs

1. The TRA is investigating the allegations of distortions within land costs for rutile titanium dioxide. Please refer to the [application](#) for full details of the allegation.

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

⁵ See also Statutory Guidance on PMS Assessments; *Tin Mill Products from China*, Final Determination, para. 174; *Biodiesel from China*, Final Determination, paras. 398, 409; *Aluminium Extrusions from China*, Final Determination, para. 168.

⁶ See also *OFC From China*, Final Determination, para. 256.



that may have impacted any aspect of land costs related to the production (whether domestically or for export) of rutile titanium dioxide.

The cost of Henan Billions' land use rights is not artificially low, and therefore Henan Billions requests the TRA not to adjust it. In any event, Henan Billions considers that its cost of land is immaterial – particularly since land use rights are depreciated over 50 years – to the cost of making rutile titanium dioxide to warrant an adjustment.⁷

Appendix reference: **N/A**

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 allegations and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted the production (whether domestically or for export) of rutile titanium dioxide.

To the best of Henan Billions' knowledge, there are no government measures, policies, laws or directives that may have impacted its production of rutile titanium dioxide.

Appendix reference: **N/A**

Tax costs

1. The TRA is investigating the allegations that rutile titanium dioxide producers in the PRC benefit from reduced tax costs. Please refer to the [application](#) for full details of the allegation.

Please set out the tax that you pay in relation to the production and/or sales of the goods concerned and like goods, and explain how it is calculated. Please

⁷ Biodiesel Investigation, Final Determination, para. 423; OFC Investigation, Final Determination, paras. 240-245.



comment on these allegations and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of tax costs related to the production (whether domestically or for export) of rutile titanium dioxide.

Henan Billions refers to its responses above on the taxes it is liable to pay and taxes paid. Henan Billions' corporate income tax rate is 25%, which is also the general tax rate in China, further confirming that no governmental measures have impacted its tax costs. In any event, when establishing the profit to be used for a constructed normal value, typically a pre-tax profit is used rather than the profit after tax.

Appendix reference:

Appendix D2.2.1 - Corporate Income Tax Statements

R&D costs

1. The TRA is investigating the allegations that rutile titanium dioxide producers in the PRC benefit from reduced R&D costs. Please refer to the [application](#) for full details of the allegation.

Please comment on these allegations and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of R&D to the production (whether domestically or for export) of rutile titanium dioxide.

Henan Billions considers that no governmental measures have impacted its cost of R&D.

Appendix reference: **N/A**

Distortions in the TiO₂ sector

1. The TRA is investigating the allegations of distortions in the TiO₂ sector. Please refer to the [application](#) for full details of the allegation.

Please comment on these allegations and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of TiO₂ related to the production (whether domestically or for export) of rutile titanium dioxide.



To the best of Henan Billions' knowledge, there are no government measures, policies, laws or directives that may have impacted any aspect of TiO₂ related to the production of rutile titanium dioxide.

Appendix reference: **N/A**

Distortions in titanium feedstocks

1. The TRA is investigating the allegations of distortions in titanium feedstocks for rutile titanium dioxide. Please refer to the [application](#) for full details of the allegation.

Please comment on these allegations and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of titanium feedstocks related to the production (whether domestically or for export) of rutile titanium dioxide.

Henan Billions considers that there are no governmental measures which may have impacted its cost of purchase of titanium feedstocks.

In any event, Henan Billions notes that first, its primary feedstocks in the production of rutile titanium dioxide are **chloride** ilmenite and synthetic rutile. Its cost of purchasing [Redacted - Products]. was [Redacted – comparative term] the prices reflected in international benchmarks (excluding China as an exporter). In fact, the weighted average cost incurred by Henan Billions in purchasing [Redacted - Product] during the IP was [Redacted - Number: commercially sensitive price information whose disclosure would provide significant competitive advantage to competitors and which cannot be presented as a range] CNY, while the weighted average price based on international benchmarks was [Redacted - Number: derived from material that is subject to copyright] This [Redacted – Percentage: commercially sensitive price information whose disclosure would provide significant competitive advantage to competitors] between the cost of purchase and international benchmarks indicates that the cost of purchasing [Redacted - Product] was not artificially low, and thus, the TRA need not adjust it.

Second, Henan Billions imported [Redacted – Product and amount] from unrelated international suppliers during the IP. The prices of those purchases were not distorted and should therefore not be adjusted.

Response to deficiency letter:



Henan Billions has amended the response in line with the deficiency letter. The redacted information constitutes sensitive business information the disclosure of which would cause significant commercial harm to Henan Billions. A range would effectively disclose Henan Billion's confidential information and would allow competitors to identify and closely approximate Henan Billion's actual data.

Appendix reference:
Appendix D14.5 – Benchmarks for feedstocks

Distortions in sulphuric acid

1. The TRA is investigating the allegations of distortions in sulphuric acid for rutile titanium dioxide. Please refer to the [application](#) for full details of the allegation.

Please comment on these allegations and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of sulphuric acid related to the production (whether domestically or for export) of rutile titanium dioxide.

Henan Billions considers that there are no governmental measures which may have impacted its cost of purchase of sulphuric acid. In any event, sulphuric acid accounts for a minuscule proportion of the cost of producing rutile titanium dioxide. Thus, in line with the Statutory Guidance and previous TRA practice, the company requests the TRA not to adjust this cost.

Response to deficiency letter: Henan Billions has amended the response in line with the deficiency letter.

Appendix reference: **N/A**

Distortions in chlorine and caustic soda

1. The TRA is investigating the allegations of distortions within chlorine and caustic soda for rutile titanium dioxide. Please refer to the [application](#) for full details of the allegation.

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



Henan Billions considers that there are no governmental measures which may have impacted its cost of purchase of caustic soda. In any event, caustic soda accounts for a minuscule proportion of the cost of producing rutile titanium dioxide. Thus, in line with the Statutory Guidance and previous TRA practice, the company requests the TRA not to adjust this cost.

Response to deficiency letter: Henan Billions has amended the response in line with the deficiency letter.

Appendix reference: **N/A**

Distortions in coal

1. The TRA is investigating the allegations of distortions within coal for rutile titanium dioxide. Please refer to the [application](#) for full details of the allegation.

Please comment on these allegations and describe any government measures, policies, laws or directives (including regional and industry specific measures) that may have impacted any aspect of coal related to the production (whether domestically or for export) of rutile titanium dioxide.

Henan Billions considers that there are no governmental measures which may have impacted its cost of purchase of coal.

Appendix reference: **N/A**

Distortions in petroleum coke

1. The TRA is investigating the allegations of distortions within petroleum coke for rutile titanium dioxide. Please refer to the [application](#) for full details of the allegation.

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

Henan Billions considers that there are no governmental measures which may have impacted its cost of purchase of petroleum coke. In any event, petroleum coke accounts for a minuscule proportion of the cost of producing rutile



titanium dioxide. Thus, in line with the Statutory Guidance and previous TRA practice, the company requests the TRA not to adjust this cost.

Response to deficiency letter: Henan Billions has amended the response in line with the deficiency letter.

Distortions in iron scrap

1. The TRA is investigating the allegations of distortions within iron scrap for rutile titanium dioxide. Please refer to the [application](#) for full details of the allegation.

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

Not applicable.

Distortions in coal waste disposal

1. The TRA is investigating the allegations of distortions within coal waste disposal for rutile titanium dioxide. Please refer to the [application](#) for full details of the allegation.

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

Henan Billions considers that there are no governmental measures which may have impacted any aspects of waste disposal related to the production of rutile titanium dioxide.

Proper comparison

1. 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.

Henan Billions does not 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. Henan Billions refers to the LB GROUP's comments in Appendix D14.1 of this Reply.

Appendix reference:

**Appendix D14.1 - LB GROUP's
comments on particular market
situation and representative country**



SECTION E: Other questions

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

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

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

Henan Billions has no comment on this issue.

Appendix reference:

2. The Applicant has alleged a "threat of material injury" in its [application](#). Do you think the UK industry is currently under the threat of injury caused by the dumped imports of the goods concerned? If yes, can you please give your comments as to why?

No, Henan Billions does not consider that the UK industry is currently under the threat of material injury caused by imports from China. Pursuant to the D&S Regulations, "threat of material injury" means injury which is "clearly foreseen and imminent". Henan Billions also recalls that such a determination cannot be made merely on "allegation, conjecture or remote possibility", but rather, must be based on facts. In this regard, Regulation 29 outlines some factors which may be relevant in an assessment of threat of material injury, none of which exists in this case.

In this regard, there is no evidence of "a likelihood of substantially increased importation", as required by Regulation 29(2)(a). Based on the data presented in the Complaint, the volume of imports and the market share of Chinese imports was lower during the IP than during the base year. Although the volume of imports were higher during the IP than in the preceding year, the rate of increase is not significant enough to indicate that it would substantially increase in the future.



Appendix reference: **N/A**

3. Are you planning to increase exports of the goods concerned? Please provide us with your export projections up to 3 years after the end of the injury period. Please provide any contracts/order confirmation covering that period.

The company does not have plans to increase export of the goods concerned to UK.

Appendix reference: **N/A**

4. If you are planning to increase/decrease export volumes, explain why.

The company does not have plans to increase export of the goods concerned to UK.

Appendix reference: **N/A**

5. Please describe how you would expect the implementation of a trade remedy to affect:
- your exports of the goods concerned to the UK
 - market price of the goods in the UK.

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

The impact of implementation of a trader remedy is unknown.

Appendix reference: **N/A**

6. Can you comment on the attractiveness of the UK market compared to other export markets.

The company has no comment.

Appendix reference: **N/A**



SECTION G: Checklist and appendices

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

Section	Please tick if you have responded to all questions
Section A – Company structure and operations	√
Section B – Sales	√
Section C – Fair comparison	√
Section D – Costing information	√
Section E – Other questions	√
Section F – Declaration	√

+Add additional rows as required.

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

Appendix reference	Document title
Appendix A1.2 - Letter of Authority	Appendix A1.2 - Letter of Authority
Appendix A2.3 - Changes in the Legal Form	Appendix A2.3 - Changes in the Legal Form
Appendix A2.4.1 - Articles of Association	Appendix A2.4.1 - Articles of Association
Appendix A2.4.2 - Business Licence	Appendix A2.4.2 - Business Licence
Appendix A2.6 - Standards of Titanium Dioxide	Appendix A2.6 - Standards of Titanium Dioxide
Appendix A2.7 - Certificate of Members of CNCIA	Appendix A2.7 - Certificate of Members of CNCIA
Appendix A3.2 - Internal Hierarchical and Organisational Structure	Appendix A3.2 - Internal Hierarchical and Organisational Structure
Appendix A3.4 - Ownership Structure of Whole Group	Appendix A3.4 - Ownership Structure of Whole Group



Appendix A6.6 - Audited Financial Statements of Henan Billions	Appendix A6.6 - Audited Financial Statements of Henan Billions
Appendix A6.8 - Trial Balance of Henan Billions	Appendix A6.8 - Trial Balance of Henan Billions
Appendix A6.11 - Chart of Accounts	Appendix A6.11 - Chart of Accounts
Appendix A7.3 - Product Brochure of Whole Group	Appendix A7.3 - Product Brochure of Whole Group
Appendix A7.8 - Product List of Whole Group	Appendix A7.8 - Product List of Whole Group
Appendix B3.1 - Channels of Distribution of Whole Group	Appendix B3.1 - Channels of Distribution of Whole Group
Appendix B4.1.5 - Documents of Export Sales to UK	Appendix B4.1.5 - Documents of Export Sales to UK
Appendix B4.2.5 - Documents of Domestic Sales	Appendix B4.2.5 - Documents of Domestic Sales
Appendix C1.4 - Supporting Documents for LPR	Appendix C1.4 - Supporting Documents for LPR
Appendix D2.2.1 - Corporate Income Tax Statements	Appendix D2.2.1 - Corporate Income Tax Statements
Appendix D2.2.2 - Value Added Tax Declarations.	Appendix D2.2.2 - Value Added Tax Declarations.
Appendix D3.2 - Production Process	Appendix D3.2 - Production Process
Appendix D10 - Cost Methodology Explanation	Appendix D10 - Cost Methodology Explanation
Appendix D12.1 – Purchase Invoices of RM and Input	Appendix D12.1 – Purchase Invoices of RM and Input
Appendix D14.1	LB GROUP's comments on particular market situation and representative country
Appendix D14.2	Benchmarks for electricity
Appendix D14.3	Benchmarks for gas
Appendix D14.4	Benchmarks for labour
Appendix D14.5	Benchmarks for feedstocks
Annex II A3 - Organisational Structure	Annex II A3 - Organisational Structure
Annex II A4 - Owners & Shareholders	Annex II A4 - Owners & Shareholders



Annex II A7.1 - Your Company's Products	Annex II A7.1 - Your Company's Products
Annex II A7.2 - Other Goods	Annex II A7.2 - Other Goods
Annex II B1.1 - Upward Sales Reconciliation	Annex II B1.1 - Upward Sales Reconciliation
Annex II B3 - Sales to the UK	Annex II B3 - Sales to the UK
Annex II B3.1 - Adjustments for UK Sales	Annex II B3.1 - Adjustments for UK Sales
Annex II B4 - Domestic Sales	Annex II B4 - Domestic Sales
Annex II B4.1 - Adjustments for Domestic Sales	Annex II B4.1 - Adjustments for Domestic Sales
Annex II B6 - Export sales to third countries	Annex II B6 - Export sales to third countries
Annex II D1 - Turnover	Annex II D1 - Turnover
Annex II D2 - Income Statement	Annex II D2 - Income Statement
Annex II D4 - Upwards Cost Reconciliation	Annex II D4 - Upwards Cost Reconciliation
Annex II D5 - Capacity	Annex II D5 - Capacity
Annex II D6 - Stocks	Annex II D6 - Stocks
Annex II D8 - Purchases	Annex II D8 - Purchases
Annex II D9 - Profitability	Annex II D9 - Profitability
Annex II D10.1 - CTM in the PRC	Annex II D10.1 - CTM in the PRC
Annex II D11.1 - AS&G in domestic market	Annex II D11.1 - AS&G in domestic market
Annex II D11.2.1 - Domestic Sale by Qty	Annex II D11.2.1 - Domestic Sale by Qty
Annex II D11.2.2 SG&A Allocation	Annex II D11.2.2 SG&A Allocation
Annex II D12 - RM and input purchased	Annex II D12 - RM and input purchased
Annex II D13 - Direct labour	Annex II D13 - Direct labour

+Add additional rows as required