

	प्रधान आयुक्त का कार्यालय, सीमा शुल्क, अहमदाबाद सीमा शुल्क भवन, आल इंडीया रेडियो के पास, नवरंगपुरा, अहमदाबाद 380009 दुरभाष (079) 2754 46 30 फैक्स (079) 2754 23 43 OFFICE OF THE PRINCIPAL COMMISSIONER OF CUSTOMS, AHMEDABAD CUSTOMS HOUSE, NEAR ALL INDIA RADIO, NAVRANGPURA, AHMEDABAD 380009 PHONE : (079) 2754 46 30 FAX (079) 2754 23 43 E-mail: cus-ahmd-adj@gov.in	
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SHOW CAUSE NOTICE

Whereas, **M/s.AKSHAY IMPEX [IEC No.- 813027233]**, (hereinafter referred to as the ‘Importer’), situated at **B-10 VASUPUJYA CHAMBER, NR.INCOME , TAX CIRCLE, ASHRAM ROAD, AHMEDABAD , GUJARAT, 380014** had filed Bills of Entry (Bs/E) as per annexure- A, for import of “Copper Tubes & Pipes” from Vietnam under CTH 7411 and paid BCD @0% and IGST @18% by virtue of Customs Notification No. 46/2011 dated 01.06.2011 read with Customs Notification No. 189/2009 (N.T.) dated 31.12.2009.

2. During examination of records and other data relating to import of Copper Tubes & Pipes, it was noticed that the Importers had cleared “Copper Tubes & Pipes” from Vietnam under AIFTA(ASEAN INDIA FREE TRADE AGREEMENT) or AIFTA’. Vietnam is an important exporter of COPPER TUBES AND PIPES to India. In recent times, there has been a sudden surge in import of Copper Tubes and Pipes under CTH 7411 from Vietnam to India. Due to AIFTA, these goods are imported into India at NIL rate of duty as the supplier has been declaring that COPPER used for making these goods is procured from Indonesia (& other ASEAN Nations). It is also seen that maximum export of COPPER TUBES AND PIPES is being done to India, as the exports figures are much greater than what is being imported from Indonesia in general.

3. There is also a rise in the imports of COPPER TUBES AND PIPES from Vietnam despite Vietnam being not a major producer of copper which fulfils most of its requirement through local production as well as through imports from various countries.

3.1 Upon reviewing the import and export data between Vietnam and other countries, several inconsistencies were identified, particularly regarding Vietnam's importation of a significant volume of copper cathodes from non-ASEAN countries. This discrepancy suggest that a substantial portion of the copper cathodes may, in fact, be sourced from non-ASEAN countries, which would affect the accuracy of their declarations under the AIFTA rules. The declarations made by key importers in their FORM 1 under the CAROTAR Rules, 2020 state that the copper used in the production of copper tubes and pipes to meet the regional value content requirements under the ASEAN-India Free Trade Agreement (AIFTA) is primarily imported from Indonesia. Since only copper originating from Indonesia, or any other ASEAN country, qualifies for exemption under the AIFTA, it appears that the exporters may be incorrectly declaring in their

FORM 1. This is because a certain higher percentage of the copper is also sourced from non-ASEAN countries. Two of the major exporters of copper tubes and pipes from Vietnam to India—M/s Hailiang (Vietnam) Copper Manufacturing Co. Ltd. and M/s Jintian Copper Industrial (Vietnam) Co. Ltd.—were analyzed. Both companies have been declaring that the copper used in their exports of copper tubes and pipes to India originates from Indonesia. However, discrepancies in their declarations have raised concerns about the accuracy of their reports in relation to AIFTA compliance.

3.2 Section 28DA- Procedure regarding claim of preferential rate of duty: -

- (1) An importer making claim for preferential rate of duty, in terms of any trade agreement, shall (i) make a declaration that goods qualify as originating goods for preferential rate of duty under such agreement;*
- (ii) possess sufficient information as regards the manner in which country of origin criteria, including the regional value content and product specific criteria, specified in the rules of origin in the trade agreement, are satisfied;*
- (iii) furnish such information in such manner as may be provided by rules;*
- (iv) exercise reasonable care as to the accuracy and truthfulness of the information furnished.*

4. Accordingly, a detailed investigation was carried out in respect of imports of Copper Tubes from Vietnam and a letter dated 24.05.2023 [RUD1] was issued to the Importers for submitting following documents as per Section 28DA of the Customs Act, 1962:

- a) Cost Break up Sheet from the Supplier from 2019 onwards to till date (as per Calendar Year and Financial Year).
- b) Cost of goods supplied by overseas supplier by indicating the Quantity, Cost of Raw Materials, Labour Cost and Overhead expenses.
- c) Detailed description about value addition being carried out (From 2018-till date).
- d) Quantity & Cost of Principal Raw Material i.e. Copper Cathodes/Ingots (Purchased & Consumed) and Quantity of Finished Products Copper Tubes/Pipes Manufactured in each accounting Period, from, 2018 to till date.
- e) Form-I for the imports made.
- f) Value and quantity of total raw material showing country of origin of the raw material as mentioned in point 4 above, by giving name of the Supplier. Please specify the complete details in tabular form which should add up to total copper processed by the company.
- g) Total quantity of local Vietnam origin copper processed during 2018 to 2023 (each year wise) and the total quantity of Vietnam origin copper exported by your supplier to you.
- h) Audited Financial Statement of the Supplier from 2018 onwards.

4.1 As replies were not received from any of the importers with respect to above letter, a letter dated 05.07.2023 [RUD2] was written to all the Ports under Jodhpur Customs (Preventive)Commissionerate directing them to clear Import consignments of Copper Tubes and Pipes imported from Vietnam, claiming AIFTA benefit either by suspending the preferential tariff treatment or under provisional assessment basis by obtaining security amount equal to difference between the duty provisionally assessed and preferential duty claimed.

4.2 A letter dated 04.07.2023 was also written to the Director of International Customs Division, CBIC, New Delhi for Verification of data presented for claiming India-ASEAN Free

Trade Agreement benefit under CAROTAR, 2020. A detailed report was forwarded to them requesting therein to delve into this matter so as to stop the malpractice of wrong declaring Chinese, Korean or Congolese Copper as Indonesian Copper.

4.3 A letter was written to all the FAG sites of Import Assessment Group 4A in India regarding Provisional assessment under Section 18 for import of Copper Tubes and Pipes from Vietnam claiming ASEAN India Free Trade Agreement benefit wherein it was requested to maintain uniformity in clearance procedure of such imported goods, so that it may not lead to shifting of importers from one port to another to evade customs duty. It was also requested that directions may be issued to field formations and Faceless Assessment Groups under their jurisdiction so as to safeguard the revenue for past imports as well.

4.4 A representation in the subject matter was received from M/s. Bombay Metal Exchange (claiming themselves a Nodal body of Non-ferrous Metal trade and Industry in India representing MSME’s, Recyclers, traders, & large Industries). An online meeting with Shri Sandeep T. Jain, President (M/s. Bombay Metal Exchange) was conducted on 04.08.2023 and the issue was explained to him. Shri Jain submitted some written submissions along with details of Imports & Exports of one of the companies and after examining the documents, it was found that they were insufficient and incomplete. Accordingly, a letter dated 09.08.2023**[RUD3]** was sent to them to submit the following documents:

- a) Copies of Original Invoices raised by Overseas Suppliers of Copper Cathodes and Ingots.
- b) Copies of the respective Bills of Lading.
- c) Copies of Original Invoices & Bills of Lading with respect to Procurement of Raw Materials and consumables other than Copper Cathodes and Ingots used in manufacturing of Copper Tubes.

4.5 In reply, a letter dated 25.08.2023 **[RUD4]** was received in the office from Lumiere Law Partners enclosing authority letter from the other importers in same case. These other importers have duly authorized Lumiere Law Partners and their suppliers to represent them in the matter before Customs. Since the importer in question is also sourcing from the same suppliers, the information submitted by Lumiere Law Partners has been considered and utilized accordingly. Lumiere Law Partners submitted the documents containing relevant details. The relevant details from these documents are reproduced as below: -

a) Analysis of RVC

Jintian Copper Industrial (Vietnam) Company Limited Analysis of RVC (Exports to India)							
S.No.	Particulars	UOM	2018	2019	2020	2021	2022
A	Copper Cathode Originated from ASEAN Countries (HSN - 74031100)	VND (Lakhs)	115,657	6,952,660	6,818,262	10,378,919	21,777,299
B	Copper Cathode Originated from Non-ASEAN Countries (HSN - 74031100)	VND (Lakhs)	872,028	8,770,458	10,683,857	13,906,740	31,806,242
C	Other Raw Material Cost Originated from Non-ASEAN Countries	VND (Lakhs)	2,396	24,037	26,972	32,432	102,847
D	Conversion Cost	VND					4,368,952

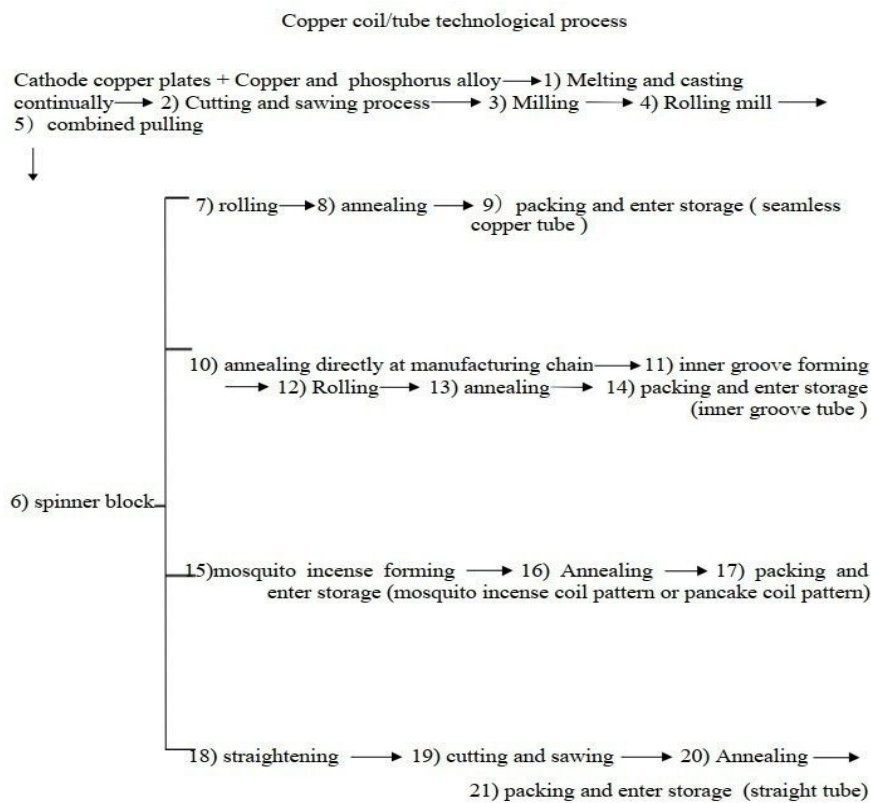
		(Lakhs)	587,269	1,827,993	2,062,142	1,844,168	
E	Total Cost	VND (Lakhs)	1,577,350	17,575,147	19,591,234	26,162,259	58,055,340
F	Profit	VND (Lakhs)	-135,055	-168,498	511,733	810,620	-712,103
G	Sales Value of Copper Pipes (HSN - 74111000)	VND (Lakhs)	1,442,296	17,406,649	20,102,966	26,972,879	57,343,236
H	FOB Sales Value of Copper Pipes (HSN - 74111000)	VND (Lakhs)	1,441,271	17,348,392	19,986,176	26,647,670	56,896,861
RVC Analysis							
I	RVC (A+D+F)	VND (Lakhs)	567,871	8,612,155	9,392,137	13,033,707	25,434,148
J	RVC (I / H)	%	39%	50%	47%	49%	45%

b) Cost Break-up sheet of the Supplier

Name of the Product		Copper Tubes & Pipes				Copper Tubes & Pipes			
HSN		741110				741110			
Quantity of Finished Goods Produced (MT)		1,417				16,710			
Total Sales (MT)		1,196				16,182			
Export to India (MT)		831				11,038			
S. No.	Particulars	1 January 2018 to 31 December 2018				1 January 2019 to 31 December 2019			
		Total		Exports to India		Total		Exports to India	
		Qty (MT)	Value (VND)	Qty (MT)	Value (VND)	Qty (MT)	Value (VND)	Qty (MT)	Value (VND)
1	Copper Cathodes - Originated from ASEAN Countries	1,196	158,500,617,697	81	11,565,650,312	16,182	2,297,010,553,900	4,728	695,265,986,504
2	Copper Cathodes - Originated from Non-ASEAN Countries			759	87,202,843,248			6,231	877,045,775,192
3	Other Raw Materials - Originated from Non-ASEAN Countries			1	239,635,781			14	2,403,680,337
4	Utility Cost		7,184,262,716		5,069,862,071		48,966,634,681		33,171,218,374
5	Direct Wages & Salaries		2,783,680,304		1,964,415,243		19,101,350,888		12,939,731,016
6	Direct Overhead Cost		37,669,163,954		26,582,750,814		109,272,650,742		74,024,016,225
7	Other Cost		35,582,030,525		25,109,881,707		92,503,698,907		62,664,310,440
8	Total Cost of Sales		241,719,755,196		157,735,039,176		2,566,854,889,118		1,757,514,718,089
9	Sales		204,380,903,633		144,229,551,763		2,569,531,889,565		1,740,664,923,857
10	Profit (9-8)		-37,338,851,563		-13,505,487,413		-2,677,000,447		-16,849,794,232
11	FOB Value		204,179,630,918		144,127,056,953		2,559,073,253,208		1,734,839,218,995

Copper Tubes & Pipes		Copper Tubes & Pipes				Copper Tubes & Pipes			
741110		741110				741110			
23,035		28,094				42,465			
23,313		28,231				42,257			
12,028		12,332				24,997			
1 January 2020 to 31 December 2020		1 January 2021 to 31 December 2021				1 January 2022 to 31 December 2022			
Total		Exports to India		Total		Exports to India		Total	
Qty (MT)	Value (VND)	Qty (MT)	Value (VND)	Qty (MT)	Value (VND)	Qty (MT)	Value (VND)	Qty (MT)	Value (VND)
23,313	3,327,264,417,824	4,921	681,826,224,694	28,231	5,878,933,521,950	5,153	1,037,891,909,774	42,257	8,800,428,227,850
		7,144	1,068,385,705,321			7,008	1,390,674,007,021		
		19	2,697,247,048			20	3,243,164,661		
	68,226,260,197		35,972,565,039		79,131,000,839		34,039,551,163		110,035,227,445
	24,416,307,402		12,873,594,471		23,067,706,710		9,922,967,919		35,483,497,876
	169,810,776,609		89,533,402,362		154,358,944,316		66,400,135,557		303,523,264,579
	128,656,437,725		67,834,614,712		172,152,016,914		74,054,129,549		298,673,616,686
	3,718,374,199,757		1,959,123,353,646		6,307,643,190,729		2,616,225,865,644		9,548,143,834,436
	3,812,767,317,673		2,010,296,620,635		6,270,326,199,531		2,697,287,879,751		9,813,893,190,585
	94,393,117,916		51,173,266,989		-37,316,991,198		81,062,014,107		265,749,356,149
	3,693,543,260,913		1,998,617,628,064		6,191,957,934,252		2,664,766,966,183		9,705,950,938,903

c) Value Addition Process



d) Details of Copper Cathode purchased by the Overseas Supplier M/s. Jintian Copper Industrial (Vietnam) Company Limited

*Details of raw materials - Copper Cathodes and Ingots - Calendar year 2018								
Country of Origin	Name of Supplier	Name of Raw Material	HS Code	Quantity (MT)	Currency	USD/MT	Value (USD)	Value (VND)
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPHOR COPPER	74072900	12,000	USD	7.66	91,934	2,116,349,830
CHINA	JIANGXI COPPER COMPANY LIMITED	COPPER CATHODE	74031100	300,582	USD	6.55	1,967,550	45,283,739,928
JAPAN	PAN PACIFIC COPPER CO., LTD	COPPER CATHODE	74031100	392,529	USD	6.50	2,551,439	59,285,443,548
CHINA	JIANGXI COPPER COMPANY LIMITED	COPPER CATHODE	74031100	399,524	USD	6.23	2,488,235	57,833,081,145
CHINA	JIANGXI COPPER COMPANY LIMITED	COPPER CATHODE	74031100	150,090	USD	6.20	930,558	21,698,326,980
CHINA	JIANGXI COPPER COMPANY LIMITED	COPPER CATHODE	74031100	300,798	USD	6.70	2,015,347	46,947,499,047
AUSTRALIA	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100	198,644	USD	4.20	834,305	19,389,243,552
INDONESIA	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100	100,018	USD	6.17	617,211	14,343,985,499
*Details of raw materials - Copper Cathodes and Ingots - Calendar year 2019								
Country of Origin	Name of Supplier	Name of Raw Material	HS Code	Quantity (MT)	Currency	USD/MT	Value (USD)	Value (VND)
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPHOR COPPER	74072900	10,000	USD	7.43	74,285	1,719,690,805
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPHOR COPPER	74072900	1,000	USD	7.83	7,826	181,250,160
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPHOR COPPER	74072900	10,000	USD	6.03	60,346	1,396,406,440
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPHOR COPPER	74072900	10,000	USD	5.99	59,892	1,384,703,040
CHINA	NINGBO JINTIAN COPPER (GROUP) CO.,	COPPER	74031100		USD			17,37

	LTD.	CATHODE		126,109		5.95	750,349	8,072,418
CHINA	NINGBO JINTIAN COPPER TUBE CO., LTD.	COPPER CATHODE	74031100	99,471	USD	6.25	622,025	14,402,988,643
CHINA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD.	COPPER CATHODE	74031100	499,330	USD	6.29	38,894	3,11,087,560
CHILE	NINGBO JINTIAN COPPER TUBE CO., LTD.	COPPER CATHODE	74031100	197,806	USD	6.25	1,236,946	28,641,489,029
MYANMAR	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100	293,996	USD	6.30	1,852,175	42,887,107,494
CHILE	NINGBO JINTIAN COPPER TUBE CO., LTD.	COPPER CATHODE	74031100	202,707	USD	6.25	1,267,594	29,351,133,513
CHINA	mitsui & co., LTD	COPPER CATHODE	74031100	500,171	USD	6.01	3,004,827	69,576,776,132
CHINA	mitsui & co., LTD	COPPER CATHODE	74031100	500,427	USD	6.01	3,006,365	69,612,387,364
MYANMAR	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100	294,000	USD	6.42	1,887,480	43,714,036,800
INDONESIA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	300,001	USD	6.27	1,880,169	43,525,918,601
INDONESIA	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100	99,995	USD	6.10	609,795	14,116,742,907
CHINA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	500,326	USD	6.38	3,193,081	73,951,759,897
INDONESIA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	300,003	USD	6.73	2,017,970	46,716,009,667
CHINA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	500,475	USD	6.70	3,354,184	77,649,362,378
INDONESIA	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100	300,001	USD	6.95	2,085,007	48,278,335,927
INDONESIA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	299,970	USD	6.64	1,990,379	46,077,272,461
CHINA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	500,451	USD	6.69	3,348,019	77,506,644,480
INDONESIA	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100	300,000	USD	6.95	2,085,000	48,267,750,000
INDONESIA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	300,001	USD	6.65	1,995,046	46,305,009,537
CHINA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	502,749	USD	6.37	3,203,516	74,738,028,047
INDONESIA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	300,000	USD	6.39	1,916,100	44,539,744,500
INDONESIA	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100	299,999	USD	6.22	1,866,744	43,551,132,387
CHINA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	497,305	USD	5.97	2,970,153	69,367,921,447
INDONESIA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	300,001	USD	5.90	1,770,456	41,154,247,396
INDONESIA	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100	300,002	USD	6.34	1,902,613	44,283,310,127
CHINA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	499,067	USD	6.10	3,045,304	70,620,594,658
INDONESIA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	300,006	USD	5.98	1,793,436	41,518,040,391
MYANMAR	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100	294,000	USD	6.37	1,873,956	43,382,081,400
CHINA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	503,521	USD	5.96	3,001,488	69,514,463,933
MYANMAR	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100	294,000	USD	6.12	1,797,810	41,619,301,500
INDONESIA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	300,005	USD	6.32	1,894,952	43,849,179,561
CHINA	mitsui &co .,LTD	COPPER CATHODE	74031100	100,247	USD	5.76	577,398	13,360,981,852
CHINA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	500,206	USD	5.86	2,928,707	67,770,286,922
INDONESIA	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100	300,008	USD	6.23	1,867,550	43,215,102,372
INDONESIA	MITSUBISHI CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100	299,988	USD	6.14	1,841,797	42,619,190,216
CHINA	NINGBO JINTIAN COPPER (GROUP) CO., LTD.	COPPER CATHODE	74031100	300,125	USD	5.88	1,763,835	40,815,133,338
CHINA	mitsui &co .,LTD	COPPER	74031100		USD			19,90

		CATHODE		150,400		5.72	860,198	4,976,166
CHINA	mitsui &co .,LTD	COPPER CATHODE	74031100		USD		1,1	26,63
				200,013		5.76	51,095	6,334,135
INDONESI A	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100		USD		1,8	43,04
				299,995		6.20	59,969	8,982,505
INDONESI A	mitsubishi CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100		USD		1,8	42,59
				300,003		6.13	40,398	6,020,968
CHINA	mitsubishi CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100		USD		2,9	68,75
				504,329		5.89	70,751	8,021,711
CHINA	mitsubishi CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100		USD		3,0	71,43
				505,608		6.11	86,991	2,982,847
CHINA	mitsui &co .,LTD	COPPER CATHODE	74031100		USD		1,7	41,59
				299,356		6.00	97,408	2,027,136
INDONESI A	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100		USD		1,9	44,42
				299,959		6.40	19,738	2,728,064
INDONESI A	mitsubishi CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100		USD		1,7	41,44
				300,005		5.97	91,030	4,430,729
CHINA	mitsui &co .,LTD	COPPER CATHODE	74031100		USD		2,9	68,28
				498,926		5.92	51,147	9,548,291
INDONESI A	mitsubishi CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100		USD		1,7	41,55
				300,024		5.99	95,944	8,136,292
CHINA	mitsui &co .,LTD	COPPER CATHODE	74031100		USD		2,9	68,57
				501,164		5.92	66,014	4,239,981
CHINA	mitsui &co .,LTD	COPPER CATHODE	74031100		USD		1,7	41,50
				301,392		5.96	95,217	5,424,901
CHINA	NINGBO JINTIAN COPPER (GROUP) CO., LTD.	COPPER CATHODE	74031100		USD		2,3	54,49
				400,170		5.89	57,001	3,870,056
CHINA	mitsubishi CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100		USD		3,0	69,75
				499,157		6.05	18,402	5,279,002
CHINA	mitsubishi CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100		USD		3,0	70,38
				499,520		6.10	45,572	3,159,907
INDONESI A	JIANGTONG INTERNATIONAL(SINGAPORE) PTE.,LTD	COPPER CATHODE	74031100		USD		1,7	41,28
				299,989		5.96	86,435	4,501,295
CHINA	mitsubishi CORPORATION RTM INTERNATIONAL PTE. LTD	COPPER CATHODE	74031100		USD		2,4	56,81
				406,551		6.05	58,414	3,945,229
*Details of raw materials - Copper Cathodes and Ingots - Calendar year 2020								
Country of Origin	Name of Supplier	Name of Raw Material	HS Code	Quantity (MT)	Currency	USD/MT	Value (USD)	Value (VND)
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPHOR COPPER	74072900		USD			1,45
				10,000		6.28	62,822	1,816,420
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPHOR COPPER	74072900		USD			2,71
				20,000		5.87	117,452	6,077,500
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPHOR COPPER	74072900		USD			3,14
				20,000		6.81	136,192	4,673,280
CHINA	mitsui &co .,LTD	COPPER CATHODE	74031100		USD		1,8	43,41
				300,855		6.24	78,749	7,894,474
CHINA	mitsui &co .,LTD	COPPER CATHODE	74031100		USD		3,1	72,25
				500,767		6.24	26,639	6,625,441
INDONESI A	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,2	73,97
				499,951		6.40	01,186	9,414,238
CHILE	SAMSUNG C AND T HONGKONG LIMITED	COPPER CATHODE	74031100		USD		1,2	29,09
				199,831		6.30	58,935	3,994,783
CHILE	SAMSUNG C AND T HONGKONG LIMITED	COPPER CATHODE	74031100		USD		1,8	43,65
				299,843		6.30	89,011	5,041,899
CHINA	mitsui &co .,LTD	COPPER CATHODE	74031100		USD		1,2	28,84
				200,333		6.23	48,375	9,948,330
INDONESI A	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		5,2	120,48
				800,006		6.52	14,839	8,857,637
CHINA	mitsui &co .,LTD	COPPER CATHODE	74031100		USD		1,8	43,24
				300,639		6.23	71,718	6,051,090
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,1	72,29
				500,951		6.25	29,190	9,944,654
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,2	74,42
				499,152		6.44	13,537	5,525,258
CHINA	mitsui &co .,LTD	COPPER CATHODE	74031100		USD		2,9	69,26
				500,051		5.98	89,995	3,233,017
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,1	72,27
				499,480		6.25	20,002	4,842,160
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,0	69,57
				499,335		6.02	03,500	6,077,963
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,0	70,17
				499,544		6.06	28,734	5,768,170
INDONESI A	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		5,1	120,39
				800,016		6.49	95,976	0,762,066
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,1	73,22
				500,478		6.32	60,519	9,215,267

CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,524	USD	5.84	2,915,647	67,424,329,013
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,442	USD	6.02	3,005,004	69,470,821,444
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,939	USD	5.68	2,837,493	66,851,340,263
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	799,999	USD	5.54	4,432,066	104,419,485,798
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	501,316	USD	5.82	2,915,153	68,214,569,436
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	501,785	USD	5.07	2,543,864	68,151,565,956
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,591	USD	5.44	2,717,617	63,565,056,952
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	800,008	USD	5.24	4,190,178	98,008,261,081
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	498,431	USD	5.42	2,699,754	62,850,265,670
CHINA	MARUBENI CORPORATION	COPPER CATHODE	74031100	99,886	USD	5.02	501,627	11,622,708,943
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	799,994	USD	5.68	4,544,998	105,307,601,575
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	300,579	USD	5.58	1,676,269	38,738,575,897
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	200,845	USD	5.58	1,120,072	25,884,873,164
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	498,728	USD	6.67	3,328,835	76,862,796,687
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	502,145	USD	5.98	3,002,767	69,363,914,004
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	501,320	USD	6.69	3,352,628	77,412,171,977
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	98,219	USD	6.62	649,719	15,002,004,552
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	399,920	USD	6.62	2,645,471	61,083,920,772
JAPAN	MARUBENI CORPORATION	COPPER CATHODE	74031100	100,189	USD	5.08	509,261	11,758,829,332
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,994	USD	7.17	3,582,852	82,728,052,911
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	501,209	USD	6.96	3,487,663	80,530,134,745
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,999	USD	7.04	3,519,843	90,596,204,544
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,554	USD	7.06	3,526,202	82,754,910,968
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	501,546	USD	6.90	3,460,015	79,891,755,355
CHINA	NINGBO JINTIAN COPPER (GROUP) CO., LTD.	COPPER CATHODE	74031100	99,908	USD	6.94	693,262	16,007,410,575
CHINA	NINGBO JINTIAN COPPER (GROUP) CO., LTD.	COPPER CATHODE	74031100	100,087	USD	6.94	694,504	16,036,090,202
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	99,950	USD	6.92	691,154	17,405,545,199
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,881	USD	7.19	3,594,894	82,970,158,367
CHINA	NINGBO JINTIAN COPPER (GROUP) CO., LTD.	COPPER CATHODE	74031100	101,710	USD	7.48	760,994	17,540,916,771
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	199,858	USD	7.88	1,574,384	36,237,673,718
CHINA	NINGBO JINTIAN COPPER (GROUP) CO., LTD.	COPPER CATHODE	74031100	51,724	USD	7.48	386,999	8,920,326,259
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,362	USD	7.77	3,888,864	89,599,415,040
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	399,983	USD	7.55	3,017,940	69,533,331,379
JAPAN	MARUBENI CORPORATION	COPPER CATHODE	74031100	97,607	USD	5.08	496,136	11,430,982,195
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	501,611	USD	7.77	3,898,571	91,744,443,187
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	299,212	USD	8.00	2,394,298	54,228,707,712
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,431	USD	7.42	3,703,281	85,323,591,245
JAPAN	MARUBENI CORPORATION	COPPER CATHODE	74031100	199,664	USD	5.08	1,014,892	23,383,114,214
*Details of raw materials - Copper Cathodes and Ingots - Calendar year 2021								
Country of Origin	Name of Supplier	Name of Raw Material	HS Code	Quantity (MT)	Currency	USD/MT	Value (USD)	Value (VND)
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD	PHOSPHOR COPPER	74072900	20,000	USD	8.90	177,941	4,089,973,885

CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPHOR COPPER	74072900	20,000	USD	9.90	197,998	4,55 0,984,030
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPHOR COPPER	74072900	20,000	USD	11.64	232,876	5,32 3,545,360
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	298,647	USD	8.23	2,4 56,373	54,11 4,525,719
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	701,475	USD	7.95	5,5 75,464	128,43 0,804,026
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	197,828	USD	8.05	1,5 93,303	36,70 1,727,464
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	800,005	USD	8.37	6,6 97,242	153,96 9,590,361
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,880	USD	7.92	3,9 56,550	90,96 1,089,098
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	498,405	USD	7.92	3,9 44,876	90,69 2,689,584
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,000	USD	8.39	4,1 94,000	96,37 8,120,000
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	501,419	USD	7.77	3,8 96,778	89,54 7,952,925
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	498,107	USD	8.28	4,1 22,582	94,73 6,928,845
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	498,608	USD	8.27	4,1 23,334	98,20 9,385,399
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,862	USD	7.77	3,8 84,678	107,35 6,281,532
JAPAN	MARUBENI CORPORATION	COPPER CATHODE	74031100	199,348	USD	5.11	1,0 18,668	23,41 4,090,416
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,003	USD	8.22	4,1 10,675	98,22 3,180,660
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	498,077	USD	8.12	4,0 41,895	102,91 1,653,103
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,474	USD	8.17	4,0 86,370	93,61 8,741,511
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHODE	74031100	19,107	USD	5.85	2,55 111,738	2,55 9,911,623
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,085	USD	8.63	4,3 16,430	98,88 9,416,340
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	498,459	USD	8.13	4,0 53,917	92,87 5,243,052
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,000	USD	9.05	4,5 24,250	104,20 5,905,900
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	1,000,000	USD	9.31	9,3 07,500	213,42 0,975,000
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	250,835	USD	8.12	2,0 35,526	52,63 7,469,629
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	247,775	USD	8.12	2,0 10,694	51,99 6,463,772
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHODE	74031100	19,120	USD	7.93	3,48 151,641	3,48 1,670,931
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,790	USD	8.52	4,2 55,712	97,71 1,144,076
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,139	USD	7.94	3,9 71,604	114,73 0,173,359
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	246,312	USD	9.15	2,2 52,523	54,04 9,747,237
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	1,000,009	USD	9.29	9,2 91,284	216,88 3,857,438
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	300,066	USD	9.30	2,7 89,474	65,11 3,408,534
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	249,658	USD	9.12	2,2 75,633	54,73 6,362,920
JAPAN	MARUBENI CORPORATION	COPPER CATHODE	74031100	98,003	USD	5.11	11,51 500,795	11,51 3,284,637
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	498,252	USD	9.18	4,5 75,053	108,30 1,462,060
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,499	USD	9.02	4,5 02,983	117,67 1,185,270
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,812	USD	9.20	4,6 08,021	110,13 7,088,659
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	498,667	USD	9.12	4,5 45,350	116,48 7,466,782
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,006	USD	10.22	5,1 11,761	117,99 7,961,321
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	199,996	USD	10.30	2,0 60,479	47,22 0,643,654
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	498,320	USD	10.75	5,3 54,846	117,73 2,248,198
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,481	USD	9.62	4,8 02,510	109,35 3,873,374

INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,001	USD	10.30	5,1260	111,287,094,618
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,970	USD	10.32	5,168,357	108,615,798,609
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	497,838	USD	10.22	5,085,415	112,500,260,447
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHODE	74031100	19,392	USD	9.15	177,495	4,057,535,243
CHINA	MARUBENI CORPORATION	COPPER CATHODE	74031100	99,633	USD	10.25	1,021,239	23,386,379,512
CHINA	MARUBENI CORPORATION	COPPER CATHODE	74031100	100,237	USD	10.20	1,021,913	23,401,811,364
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	501,838	USD	9.72	4,875,356	108,736,663,790
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,998	USD	9.57	4,783,631	109,092,287,015
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,472	USD	9.58	4,785,688	109,263,528,497
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHODE	74031100	19,812	USD	8.96	177,476	4,067,747,628
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	497,779	USD	9.65	4,802,918	108,815,325,486
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,497	USD	9.62	4,802,664	101,782,290,023
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	300,009	USD	9.62	2,884,587	64,336,330,213
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	492,268	USD	10.12	4,979,291	108,239,695,645
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	199,267	USD	9.62	1,915,952	42,732,409,678
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	492,660	USD	9.62	4,736,926	105,227,562,265
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,001	USD	9.80	4,898,210	107,887,125,638
CHINA	MARUBENI CORPORATION	COPPER CATHODE	74031100	100,252	USD	9.54	956,450	21,845,326,908
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	499,887	USD	9.51	4,755,925	113,930,246,153
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	498,198	USD	9.64	4,800,138	109,089,596,814
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	200,556	USD	9.91	1,987,857	44,826,173,546
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	300,226	USD	9.91	2,975,759	67,177,760,554
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,013	USD	10.51	5,255,737	111,246,622,809
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	500,546	USD	9.25	4,631,552	110,275,001,356
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	501,269	USD	9.25	4,638,242	109,121,612,098
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	249,465	USD	10.00	2,493,403	54,291,319,122
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	599,997	USD	9.86	5,913,210	130,895,474,720
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	248,361	USD	9.94	2,467,467	54,050,886,234
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	498,886	USD	9.91	4,945,158	111,471,336,290
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	498,379	USD	9.86	4,912,517	110,212,564,176
*Details of raw materials - Copper Cathodes and Ingots - Calendar year 2022								
Country of Origin	Name of Supplier	Name of Raw Material	HS Code	Quantity (MT)	Currency	USD/MT	Value (USD)	Value (VND)
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPHOR COPPER	74072900	19,996	USD	11.73	234,505	5,349,059,050
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPHOR COPPER	74072900	20,000	USD	10.24	204,757	4,762,647,820
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	400,000	USD	9.64	3,856,124	87,302,647,360
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,000	USD	9.64	4,820,155	109,128,309,200
CHINA	MARUBENI CORPORATION	COPPER CATHODE	74031100	99,697	USD	9.71	967,960	21,914,616,890
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	497,331	USD	9.67	4,806,854	108,827,184,069
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,052	USD	9.82	4,908,010	108,300,327,346
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	501,004	USD	9.67	4,842,204	114,851,744,600

JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHODE	74031100	20,626	USD	9.29	191,616	4,322,846,582
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	295,165	USD	9.73	2,70,480	66,136,187,390
INDONESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	299,989	USD	9.80	2,40,192	66,154,324,275
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	197,135	USD	10.00	1,70,364	44,057,911,050
INDONESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	499,998	USD	9.69	4,45,200	112,751,549,100
INDONESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	499,999	USD	9.69	4,46,158	112,751,774,550
JAPAN	PANASONIC PROCUREMENT MALAYSIA SDN BHD	COPPER CATHODE	74031100	19,213	USD	9.54	183,352	4,125,427,875
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	497,580	USD	9.82	4,83,748	113,122,076,400
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	501,078	USD	9.76	4,90,822	115,540,669,768
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	501,516	USD	9.82	4,22,380	114,927,242,090
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	300,001	USD	9.82	2,44,510	68,748,130,832
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,000	USD	9.89	4,45,465	112,014,782,250
INDONESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	300,000	USD	9.78	2,35,080	69,905,452,680
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	299,994	USD	10.02	3,04,440	69,381,139,649
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	324,798	USD	10.39	3,75,459	76,387,651,279
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	400,928	USD	9.97	3,97,733	94,014,007,648
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,001	USD	10.62	5,09,051	117,592,931,672
INDONESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	300,005	USD	9.95	2,83,610	70,732,086,111
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	501,095	USD	10.02	5,18,467	115,890,791,694
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHODE	74031100	19,311	USD	9.23	178,183	4,051,872,324
INDONESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	500,002	USD	9.95	4,72,620	118,800,512,537
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	497,317	USD	10.27	5,04,959	118,139,431,254
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	299,996	USD	10.52	3,54,458	70,772,458,061
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	499,690	USD	10.51	5,50,193	117,652,615,193
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	502,210	USD	10.52	5,80,738	118,581,418,618
INDONESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	299,991	USD	10.51	3,51,975	70,563,930,950
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	500,552	USD	10.51	5,59,250	114,617,733,343
AUSTRALIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	199,032	USD	10.36	2,62,089	47,067,180,284
CHILE	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,937	USD	10.52	5,56,838	113,761,898,302
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,423	USD	10.52	5,61,948	112,446,388,570
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	100,842	USD	10.56	1,64,892	24,290,175,571
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHODE	74031100	18,900	USD	8.73	165,016	3,764,012,679
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	496,844	USD	10.57	5,49,157	108,067,745,843
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	249,457	USD	9.62	2,00,823	54,203,551,664
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	500,397	USD	9.67	4,37,338	111,016,902,510
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	300,004	USD	9.82	2,44,539	65,370,917,241
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,516	USD	9.82	4,12,565	109,062,512,411
INDONESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	299,993	USD	10.45	3,35,047	65,343,977,885
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	100,309	USD	10.20	1,22,650	23,546,522,237
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHODE	74031100	19,246	USD	8.33	160,338	3,691,792,351

CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	149,964	USD	9.66	49,012	1,4	31,61
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	499,944	USD	9.55	74,365	4,7	110,51
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	449,832	USD	9.66	44,205	4,3	98,21
INDONESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	300,010	USD	9.55	65,036	2,8	66,20
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	199,238	USD	9.47	86,344	1,8	43,51
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	299,999	USD	9.62	84,490	2,8	65,81
CHILE	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,246	USD	9.52	50,326	4,7	106,41
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	250,284	USD	9.70	28,656	2,4	52,70
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,401	USD	9.62	01,741	4,8	110,47
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,690	USD	9.53	69,072	4,7	106,39
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	299,699	USD	9.89	64,501	2,9	63,10
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	298,902	USD	9.82	33,787	2,9	62,95
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	100,921	USD	10.20	28,890	1,0	23,77
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHODE	74031100	21,532	USD	8.40	180,912		4,18
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	200,912	USD	8.89	86,974	1,7	41,29
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	100,061	USD	8.89	889,974		20,56
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	500,009	USD	8.53	64,652	4,2	98,66
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	498,040	USD	9.57	63,753	4,7	86,84
INDONESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	299,991	USD	9.75	24,072	2,9	55,08
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,940	USD	8.82	06,971	4,4	102,28
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	201,019	USD	9.47	04,293	1,9	35,69
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	300,008	USD	8.82	44,571	2,6	61,38
CHILE	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,910	USD	9.32	56,662	4,6	91,55
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	79,569	USD	10.20	811,206		18,87
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	599,974	USD	7.72	33,777	4,6	106,77
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,006	USD	7.72	61,696	3,8	94,06
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	501,141	USD	7.40	05,938	3,7	96,69
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	300,002	USD	8.02	04,516	2,4	57,43
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	60,651	USD	10.20	618,337		14,38
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHODE	74031100	19,087	USD	9.74	185,984		4,32
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,964	USD	8.61	04,205	4,3	93,97
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	199,882	USD	7.96	91,620	1,5	37,00
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	499,273	USD	8.02	01,673	4,0	93,03
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	300,337	USD	7.96	91,523	2,3	56,84
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	299,645	USD	8.93	75,483	2,6	54,78
CHILE	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	502,984	USD	7.82	30,820	3,9	95,65
CHILE	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	500,384	USD	8.02	10,578	4,0	92,62
INDONESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100	100,003	USD	7.93	792,644		18,15
CHILE	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	249,961	USD	8.22	53,430	2,0	45,33
CHILE	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100	249,981	USD	8.22	53,594	2,0	45,34
INDONESIA	JINTIAN (SINGAPORE)	COPPER	74031100		USD			3,1	72,66

A	INTERNATIONAL INDUSTRY PTE.LTD.	CATHODE		400,002		7.93	70,496	6,089,801
INDONESI A	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		2,4	56,36
				300,003		8.22	64,525	6,566,084
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		4,1	94,23
				501,535		8.22	20,110	1,743,536
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		4,2	91,91
				499,964		8.57	83,829	2,628,500
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		4,0	89,34
				493,950		8.17	33,102	6,954,607
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD			18,81
				78,653		10.20	801,867	1,807,796
INDONESI A	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		2,4	56,74
				299,999		8.06	18,637	1,222,612
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHODE	74031100		USD			4,77
				21,240		9.54	202,523	2,463,921
INDONESI A	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		2,3	56,15
				299,998		7.82	44,484	5,895,761
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100		USD		3,9	91,83
				502,924		7.80	24,165	9,559,998
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,8	93,59
				500,753		7.60	03,219	7,022,241
CHILE	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,8	94,63
				499,913		7.72	56,829	8,199,323
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		1,5	37,36
				201,288		7.91	92,208	8,743,485
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD			18,50
				99,653		7.91	788,268	0,450,145
INDONESI A	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100		USD			19,76
				99,998		7.75	774,695	3,138,708
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100		USD		3,9	97,21
				499,662		7.98	85,954	7,410,011
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHODE	74031100		USD			4,30
				19,220		9.18	176,440	3,361,844
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		1,0	24,70
				99,366		10.20	13,036	7,957,064
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,9	97,88
				503,217		7.91	79,606	6,371,242
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100		USD		3,8	100,33
				503,383		7.75	99,758	0,619,160
INDONESI A	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		4,2	109,05
				549,991		7.72	43,181	8,091,281
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,9	96,03
				499,256		7.82	05,480	9,658,434
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,9	100,91
				499,181		7.95	70,837	7,743,064
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,8	99,59
				499,787		7.72	55,857	8,681,594
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100		USD		3,1	80,29
				400,849		7.75	05,417	3,812,163
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,8	100,69
				497,382		7.82	87,040	4,925,343
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		1,0	24,93
				99,374		10.20	13,118	2,832,257
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		1,9	49,24
				248,198		7.72	14,848	1,362,218
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100		USD		3,8	101,34
				500,734		7.77	90,753	4,876,296
CHILE	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		4,4	104,74
				499,912		8.92	56,715	8,980,567
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		4,0	103,17
				499,146		8.07	25,612	8,686,170
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHODE	74031100		USD		3,9	102,68
				500,880		7.89	51,943	4,241,750
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		4,1	103,48
				500,616		8.22	12,560	2,184,730
INDONESI A	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		3,2	82,68
				400,003		8.22	86,025	4,499,050
INDONESI A	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		1,4	36,87
				175,001		8.22	37,633	3,626,034
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		2,4	60,28
				301,018		8.22	72,863	2,054,896
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD			19,93
				100,631		8.22	826,684	8,948,641
CHILE	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		4,1	101,97
				499,945		8.28	37,045	1,891,710
INDONESI A	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		4,3	100,42
				500,005		8.66	31,693	5,351,316
INDONESI A	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		4,3	100,42
				500,001		8.66	31,659	4,547,896
INDONESI A	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHODE	74031100		USD		4,3	100,43
				499,994		8.66	31,598	2,142,087

JAPAN	HONGKONG	MAYTIME	COPPER	74031100		USD		1,2	28,64
	INTERNATIONAL INDUSTRY LIMITED		CATHODE		119,365		10.20	16,926	6,442,277
INDONESIA	HONGKONG	MAYTIME	COPPER	74031100		USD		4,3	100,42
A	INTERNATIONAL INDUSTRY LIMITED		CATHODE		500,006		8.66	31,702	5,552,113

- e) Sample Form I
- f) Audited financial statements for the Period 2018-2022.
- g) Copies of Original Invoices raised by the Overseas Supplier M/s. JintianCopper Industrial (Vietnam) Co Ltd. of Copper Cathodes and Ingots for the Period 2018-2022.
- h) Copies of the respective Bills of Lading for the Period 2018-2022.

4.6 In reply, a letter dated 22.09.2023 [RUD6] was received in the office from Lumiere Law Partners enclosing authority letter from the other importers in same case, these other importers have duly authorized Lumiere Law Partners and their suppliers to represent them in the matter before Customs. Since the importer in question is also sourcing from the same suppliers, the information submitted by Lumiere Law Partners has been considered and utilized accordingly. Lumiere Law Partners submitted the documents containing relevant details. The relevant details from these documents are reproduced as below: -

a) Analysis of RVC

Hailiang (Vietnam) Copper Maufacturing Co. Ltd Analysis of RVC (Exports to India)

S.No .	Particulars	UOM	2020	2021	2022
A	Copper Cathode Originated from ASEAN Countries (HSN - 74031100)	VND (Lakhs)	15,213,218	21,023,760	27,871,484
B	Copper Cathode Originated from Non-ASEAN Countries (HSN - 74031100)	VND (Lakhs)	9,392,036	14,154,810	39,278,682
C	Other Raw Material Cost Originated from Non-ASEAN Countries	VND (Lakhs)	129,594	103,022	147,780
D	Utility Cost	VND (Lakhs)	287,239	332,899	568,695
E	Direct Wages & Salaries	VND (Lakhs)	193,379	218,949	344,849
F	Direct Overhead Cost	VND (Lakhs)	940,771	916,851	1,559,018
G	Other Cost	VND (Lakhs)	139,382	217,307	351,511
H	Total Cost	VND (Lakhs)	26,295,619	36,967,598	70,122,019
I	Profit	VND (Lakhs)	1,922,930	955,244	5,576,595
J	FOB Sales Value of Copper Pipes (HSN - 74111000)	VND (Lakhs)	28,218,549	37,922,841	75,698,614
RVC Analysis					
K	RVC (A+D+E+F+G+I "OR" J-B-C)	VND (Lakhs)	18,696,919	23,665,009	36,272,152
L	RVC (K / J)	%	66%	62%	48%

b) Cost Break-up sheet of the Supplier

Name of the Product		Copper Tubes & Pipes					
HSN			74111000		74111000		74111000
Quantity of Finished Goods Produced (MT)			68,385		43,254		57,601
Total Sales (MT)			67,438		41,067		54,365
Export to India (MT)			17,584		18,143		31,935
S.No .	Particulars	Jan 20 - Dec 20		Jan 21 - Dec 21		Jan 22 - Dec 22	
		Exports to India		Exports to India		Exports to India	
		Qty (MT)	Value (VND)	Qty (MT)	Value (VND)	Qty (MT)	Value (VND)
1	Copper Cathode	17,568	2,460,525,479,260	18,126	3,517,856,953,164	31,906	6,715,016,549,091

	Originated from ASEAN Countries	10,893	1,521,321,847,592	10,920	2,102,375,968,193	13,507	2,787,148,380,947
	Originated from Non-ASEAN Countries	6,675	939,203,631,667	7,206	1,415,480,984,971	18,399	3,927,868,168,144
2	Other Raw Materials - Originated from Non-ASEAN Countries		12,959,353,007		10,302,224,800		14,777,997,639
3	Utility Cost		28,723,911,138		33,289,873,439		56,869,526,619
4	Direct Wages & Salaries		19,337,886,803		21,894,934,336		34,484,912,575
6	Direct Overhead Cost		94,077,077,796		91,685,087,754		155,901,760,592
7	Other Cost		13,938,168,117		21,730,686,186		35,151,129,304
8	Total Cost of Sales		2,629,561,876,120		3,696,759,759,680		7,012,201,875,820
9	FOB Value		2,821,854,925,571		3,792,284,114,444		7,569,861,352,811
10	Profit (10-9)		192,293,049,451		95,524,354,764		557,659,476,991

c) Value Addition Process

Production process narrative for coil tube (i.e. smooth tube, pancake coil, inner grooved tube and insulation tube)

Production process	Description	Input	Machinery equipment	Production capacity / hour	Number of workers / shift	Number of shifts
Casting process	Melt cathode copper in induction melting furnace, add phosphor copper to deoxidize, preserve heat and forge continuously into blank tube as per requirement.	Cathode copper, phosphor copper, recycled copper	casting furnace	2.4	3	3
Milling & rolling process	The process of removing the unqualified defects and structure on the outer surface of the cast tube through a milling machine. Roll the cast billet after milling through a rolling mill to reduce the outer diameter and wall thickness, and produce the tubes that meet the requirements	Ingot casting	milling machine, rolling machine	3	2	3
Combined drawing process	The rolled tube is drawn through a three-series (or two-series) stretching machine to reduce the outer diameter and wall thickness, and produce the tubes that meet the requirements.	Rolled tube	double drawing machine	3	4	3
Coil drawing process	The double-drawn tube blank is drawn through an inverted high-speed disc drawing machine in multiple passes to reduce the outer diameter and wall thickness.	Tube blank	Spinner Block machine	1	1	3
Level winder Process	The coiled tube blank is divided into coils by a rewinding machine, and the copper tube is crimped into a regular horizontal coil through the drum of the level winder machine	Coil drawing tube	level winder machine	0.8	1	3
Pancake coil forming process	The coil tube blank is passed through the processes of paying off, straightening, cleaning, eddy current flaw detection, pancake coil forming, deburring, and cleaning the inner wall copper burrs to produce the products that meet the requirements.	Coil drawing tube	Pancake coil forming machine	0.8	2	3
Inner grooved tube process	After heat treatment, the coil drawing tube provided by the coil drawing process is transferred to the internal groove forming machine for processing, and grooves are formed on the inner surface of the copper tube to become an inner groove copper tube	Coil drawing tube	IGT	0.3	1	3
Finished product process - smooth tube	Rewind into the coils, and process hard products into soft copper pipes through heat treatment equipment for heating, heat preservation, and cooling.	Semi-FG smooth tube	Furnace	7.5	17	3
Finished product process - pancake coil	The coil tube provided by the pancake coil forming process is processed into a soft copper tube through the process of heating, heat preservation and cooling by heat treatment equipment	Semi-FG pancake coil	Furnace	7.5	17	3
Finished product process - inner grooved tube	The coil tube provided by the inner grooved tube process is processed into a soft copper tube through the process of heating, heat preservation and cooling by heat treatment equipment	Semi-FG inner grooved tube	Furnace	7.5	17	3
Finished product process - insulation tube	The finished smooth tube is annealed to meet the customer's requirements for the product after discharging, cutting to length, wearing insulation sleeve, spraying, crimping, and packing.	Semi-FG smooth tube	Pipe threading machine and crimping machine	5	7	3

Production process narrative for straight tube

Feeding selection: 1. Extrusion process feeding; 2. Rolling process feeding

Production processes	Description	Input	Machinery equipment	Production capacity / hour	Number of workers/ shift	Number of shifts
Semi-continuous casting process	By heating the cathode copper in an induction electric furnace to a melting point above the melting point, phosphorous copper is added for deoxidation, heat preservation, and casting into a tube blank produced by the technical requirements.	Cathode copper, phosphor copper, recycled copper, purchased defective copper tube, purchased copper scrap	Semi-continuous casting furnace	1	2	3
Extrusion process	The copper ingot in the casting process is heated, perforated, and extruded to produce a tube blank that meets the process requirements	Copper ingot	Extruding machine	5	8	1
Rolling process	The extruded tube blank is processed by a double-hole rolling machine to produce tube blanks that meet the technical requirements	Extruded tube	Extruding machine and rolling machine	1	2	2
Finished product process - straight tube	The rolled tube is drawn through a three-wire drawing machine to reduce the outer diameter and wall thickness to meet the process size requirements. At the same time, the cut-to-length, internal and external surface cleaning and packaging are carried out to make a finished product that meets customer requirements	1. Extruded tube or 2. Rolled tube	Stretching machine, straightening machine	1	5	2

Feeding selection: 3. Combined drawing process feeding; 4. Pancake coil forming process feeding

Production processes	Description	Input	Machinery equipment	Production capacity / hour	Number of workers/ shift	Number of shifts
Casting process	Melt cathode copper in induction melting furnace, add phosphor copper to deoxidize, preserve heat and forge continuously into blank tube as per requirement.	Cathode copper, phosphor copper, recycled copper	casting furnace	2.4	3	3
Milling & rolling process	The process of removing the unqualified defects and structure on the outer surface of the cast tube through a milling machine. Roll the cast billet after milling through a rolling mill to reduce the outer diameter and wall thickness, and produce the tubes that meet the requirements	Ingot casting	milling machine, rolling machine	3	2	3
Combined drawing process	The rolled tube is drawn through a three-series (or two-series) stretching machine to reduce the outer diameter and wall thickness, and produce the tubes that meet the requirements.	Rolled tube	combined drawing machine	3	4	3
Coil drawing process	The double-drawn tube blank is drawn through an inverted high-speed disc drawing machine in multiple passes to reduce the outer diameter and wall thickness.	Tube blank	Spinner Block machine	1	1	3
Pancake coil forming process	The tube blank is passed through the processes of paying off, straightening, cleaning, eddy current flaw detection, straight tube forming, deburring, and cleaning the inner wall copper burrs to produce the products that meet the requirements.	Coil drawing tube	Pancake coil forming machine	0.8	2	3
Finished product process - straight tube	The rolled tube is drawn through a three-wire drawing machine to reduce the outer diameter and wall thickness to meet the process size requirements. At the same time, the cut-to-length, internal and external surface cleaning and packaging are carried out to make a finished product that meets customer requirements	3. Tube blank or 4. Semi-FG Pancake coil	Stretching machine, straightening machine	1	5	2

d) Details of Copper Cathode purchased by the Overseas Supplier M/s. Hailiang Copper Manufacturing Co. Ltd.:

Year	Purchase Invoice No.	Origin of Material	Supplier Name	QTY.	Unit	Invoice Value
2018	JSYN1800JIN1809-	CHINA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	494,828	KG	2,944,226.60
2018	HKYN18MIT09-1000	INDONESIA	Hong Kong Hailiang Metal Trading Limited	1,000,003	KG	5,950,017.85
2018	HKYNV1809LD510-1	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	510,602	KG	3,063,612.00
2018	HKYN18PC10-500A	INDONESIA	Hong Kong Hailiang Metal Trading Limited	250,074	KG	1,575,466.20
2018	HKYNV1810LD494-1	CONGO	Hong Kong Hailiang Metal Trading Limited	494,592	KG	2,967,552.00
2018	HKYNV1810LD502-1	CONGO	Hong Kong Hailiang Metal Trading Limited	502,345	KG	3,089,421.75
2018	HKYN18MIT10-1000	CHINA	Hong Kong Hailiang Metal Trading Limited	1,001,288	KG	6,207,985.60
201	HKYN18GLEN10 -15	CHINA	Hong Kong Hailiang Metal Trading Limited	497,511	KG	3,084,568.2

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2018	HKYN18PC10-500B	JAPAN	Hong Kong Hailiang Metal Trading Limited	249,617	KG	1,572,587.10
2018	HKYN1811LD1200 -	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	416,353	KG	2,539,753.30
2018	HKYN1811PPC497-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	497,244	KG	3,033,188.40
2018	HKYN1811PPC499-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	499,189	KG	3,045,052.90
2018	HKYN18GLYQ11-300	R.KOREA	Hong Kong Hailiang Metal Trading Limited	296,529	KG	1,779,174.00
2018	HKYN18SM10 -150	CHINA	Hong Kong Hailiang Metal Trading Limited	150,372	KG	917,269.20
2018	HKYN1811LD1200-4	CONGO	Hong Kong Hailiang Metal Trading Limited	197,692	KG	1,205,921.20
2018	HKYN1811LD1200-2	CONGO	Hong Kong Hailiang Metal Trading Limited	92,698	KG	565,457.80
2018	HKYN1811LD1200 -	CONGO	Hong Kong Hailiang Metal Trading Limited	492,807	KG	3,006,122.70
2018	HKYN1811MARU99-1	CHINA	Hong Kong Hailiang Metal Trading Limited	99,365	KG	606,126.50
2018	HKYN1811MARU99-2	CHINA	Hong Kong Hailiang Metal Trading Limited	99,395	KG	606,309.50
2018	HKYN18PC11-500A	JAPAN	Hong Kong Hailiang Metal Trading Limited	498,494	KG	3,090,662.80
2018	HKYN18SM11-100-A	CHINA	Hong Kong Hailiang Metal Trading Limited	100,670.500	KG	614,090.05
2018	1811YT200	CHINA	Hong Kong Hailiang Metal Trading Limited	199,913	KG	1,229,464.95
2018	HKYN1811PPC295-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	295,592	KG	1,803,111.20
2018	HKYN18PC11-1000A	JAPAN	Hong Kong Hailiang Metal Trading Limited	498,623	KG	3,091,462.60
2018	HKYN17PC12-120A	JAPAN	Hong Kong Hailiang Metal Trading Limited	41,304	KG	284,714.67
2018	HKYN18MIT11-1000	CHINA	Hong Kong Hailiang Metal Trading Limited	403,148.400	KG	2,499,520.08
2018	HMYN18PC11-500B	JAPAN	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	498,978	KG	3,093,663.60
2018	HKYN18MIT11-1000	CHINA	Hong Kong Hailiang Metal Trading Limited	597,404	KG	3,644,164.40
2018	HKYN181030ARC250	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	250,472	KG	1,552,926.40
2018	HKYN1800JIN1810	CHINA	Hong Kong Hailiang Metal Trading Limited	498,749	KG	3,117,181.25
2018	HKYN181121	CONGO	Hong Kong Hailiang Metal Trading Limited	298,874	KG	1,817,153.92
2018	HKVN181123	CONGO	Hong Kong Hailiang Metal Trading Limited	499,400	KG	3,096,280.00
2018	HKYN1811MARU99-3	CHINA	Hong Kong Hailiang Metal Trading Limited	98,881	KG	603,174.10
2018	HKYN18PC12-80-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	79,947	KG	553,178.08
2018	HKYNV1812LD209 -	CONGO	Hong Kong Hailiang Metal Trading Limited	209,177	KG	1,301,080.94
2018	HKYNV1812LD493 -	CONGO	Hong Kong Hailiang Metal Trading Limited	493,809	KG	3,086,306.25
2018	HKYN1811MARU200 -	CHINA	Hong Kong Hailiang Metal Trading Limited	98,491	KG	610,644.20
2018	HKYN1811MARU200 -	CHINA	Hong Kong Hailiang Metal Trading Limited	99,013	KG	613,880.60
2018	HMYN18PC12-200A	CHINA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	199,344	KG	1,252,877.04
2018	1812YT200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,882	KG	1,245,468.40
2018	HKVN171126TRA500	CONGO	Hong Kong Hailiang Metal Trading Limited	538,210	KG	3,875,112.00
2018	HMYN17MIT12-600A	JAPAN	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	299,846	KG	2,143,898.90
2018	SMYNV1700JIN19EX	CHINA	HAILIANG (SINGAPORE) PTE. LTD.	499,210	KG	3,544,391.00
2018	HMYN17MIT12-500A	INDONESIA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	500,000	KG	3,575,000.00
2018	HKYN17PC12-300A	JAPAN	Hong Kong Hailiang Metal Trading Limited	299,315	KG	2,125,136.50
2018	1801HKLU100VIETN	LAOS	Hong Kong Hailiang Metal Trading Limited	25,307	KG	187,423.64
2018	1801HKLU100VIETN	LAOS	Hong Kong Hailiang Metal Trading Limited	78,608	KG	582,170.85
2018	1801HKLU200VIETN	LAOS	Hong Kong Hailiang Metal Trading Limited	130,730	KG	941,256.00
2018	1801HKLU200VIETN	R.KOREA	Hong Kong Hailiang Metal Trading Limited	69,463	KG	500,133.60
2018	1801HKLU300VIETN	LAOS	Hong Kong Hailiang Metal Trading Limited	106,351	KG	801,354.79
2018	1801HKLU300VIETN	LAOS	Hong Kong Hailiang Metal Trading Limited	51,216	KG	385,912.56
2018	1801HKLU300VIETN	LAOS	Hong Kong Hailiang Metal Trading Limited	152,000	KG	1,145,320.00
2018	HKYNV1801PPC200I	INDONESIA	Hong Kong Hailiang Metal Trading Limited	199,966	KG	1,461,751.46
2018	1801HKLU150VIETN	LAOS	Hong Kong Hailiang Metal Trading Limited	152,524	KG	1,148,505.72
2018	HKYNV1801PPC400J	JAPAN	Hong Kong Hailiang Metal Trading Limited	399,910	KG	2,879,352.00
2018	SMYN18MIT01-1000	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	1,000,001	KG	7,150,007.15
2018	HMYN18SAM01-150A	CONGO	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	156,035	KG	1,107,848.50
2018	HKYN18PC01-500A	JAPAN	Hong Kong Hailiang Metal Trading Limited	499,856	KG	3,498,992.00
2018	HKYN18MIT01-500-	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,004	KG	3,550,028.40

2018	HKYNV1801PPC600J	JAPAN	Hong Kong Hailiang Metal Trading Limited	588,807	KG	4,209,970.05
2018	HKYN18SAM01-400A	CONGO	Hong Kong Hailiang Metal Trading Limited	412,546	KG	2,929,076.60
2018	HKYN18PC01-20A	JAPAN	Hong Kong Hailiang Metal Trading Limited	19,615	KG	134,660.70
2018	HKYN18MIT01-500-	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,004	KG	3,550,028.40
2018	HKYN18PC01-500	JAPAN	Hong Kong Hailiang Metal Trading Limited	498,466	KG	3,489,262.00
2018	SMYNV1800JIN18ZY	CHINA	HAILIANG (SINGAPORE) PTE. LTD.	497,312	KG	3,580,646.40
2018	HKYN180126	CHINA	Hong Kong Hailiang Metal Trading Limited	299,652	KG	2,133,522.24
2018	SMYNV1801JIN18ZY	CHINA	HAILIANG (SINGAPORE) PTE. LTD.	499,856	KG	3,598,963.20
2018	HKYN180202	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	513,571	KG	3,656,625.52
2018	HKVN180202-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,078	KG	1,420,553.80
2018	HKYN180203	CHINA	Hong Kong Hailiang Metal Trading Limited	100,116	KG	712,825.92
2018	HKYN180203	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	97,735	KG	695,873.20
2018	HKYN18SAM01-500A	CONGO	Hong Kong Hailiang Metal Trading Limited	502,074	KG	3,514,518.00
2018	HKYNV1802PPC400J	JAPAN	Hong Kong Hailiang Metal Trading Limited	396,990	KG	2,778,930.00
2018	HKYN18PC02-40A	JAPAN	Hong Kong Hailiang Metal Trading Limited	40,209	KG	276,042.42
2018	HKYN18PC02-500-0	JAPAN	Hong Kong Hailiang Metal Trading Limited	498,571	KG	3,539,854.10
2018	HKYN18MIT2-500-0	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,000	KG	3,500,000.00
2018	HKYN18MIT2-500-0	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,011	KG	3,500,077.00
2018	HKYN180228	CONGO	Hong Kong Hailiang Metal Trading Limited	102,030	KG	714,210.00
2018	HKYN18PC02-500-0	JAPAN	Hong Kong Hailiang Metal Trading Limited	498,527	KG	3,489,689.00
2018	SGVN1800JIN1802-	CHINA	HAILIANG (SINGAPORE) PTE. LTD.	500,471	KG	3,403,202.80
2018	HKYN18PC01-500A1	JAPAN	Hong Kong Hailiang Metal Trading Limited	498,202	KG	3,387,773.60
2018	HKYN18PC03-40A	JAPAN	Hong Kong Hailiang Metal Trading Limited	61,225	KG	428,306.83
2018	HKYN180301	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	156,170	KG	1,046,339.00
2018	HKYN180310	INDONESIA	Hong Kong Hailiang Metal Trading Limited	283,814	KG	1,929,935.20
2018	HKYN18MIT2-1000B	CHINA	Hong Kong Hailiang Metal Trading Limited	1,006,209.300	KG	6,842,223.24
2018	HKYN180315	CONGO	Hong Kong Hailiang Metal Trading Limited	226,973	KG	1,588,811.00
2018	TLYN18PC03-500B1	JAPAN	Loyal Hailiang Copper (Thailand) Co	499,906	KG	3,424,356.10
2018	HKVN1800318-426	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	426,559	KG	2,985,913.00
2018	HKYN180309	CONGO	Hong Kong Hailiang Metal Trading Limited	426,559	KG	2,900,601.20
2018	HKYN18MIT03-1000	CHINA	Hong Kong Hailiang Metal Trading Limited	1,003,153.700	KG	6,921,760.53
2018	HKYN18PC03-400A	JAPAN	Hong Kong Hailiang Metal Trading Limited	399,993	KG	2,679,953.10
2018	HKYNV1803PPC298-	JAPAN	Hong Kong Hailiang Metal Trading Limited	298,303	KG	2,028,460.40
2018	HKYNV1803LD300C G	CONGO	Hong Kong Hailiang Metal Trading Limited	301,027	KG	2,077,086.30
2018	HKYN1800JIN1803-	CHINA	Hong Kong Hailiang Metal Trading Limited	498,430.300	KG	3,289,639.98
2018	TLYN18MIT03-1000	INDONESIA	Loyal Hailiang Copper (Thailand) Co	1,000,001	KG	6,700,006.70
2018	HKYNV1803LD395-1	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	395,694	KG	2,690,719.20
2018	1803YT200	CHINA	Hong Kong Hailiang Metal Trading Limited	199,255	KG	1,335,008.50
2018	HKYN18PC04-300A	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	300,616	KG	2,029,158.00
2018	HKYN180403	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	667,391	KG	4,504,889.25
2018	HKYN18PC04-20A	JAPAN	Hong Kong Hailiang Metal Trading Limited	20,513	KG	141,487.60
2018	THHKYNV1804MAR U3	JAPAN	Hong Kong Hailiang Metal Trading Limited	301,218	KG	2,048,282.40
2018	HKYN18SAM03-500A	CONGO	Hong Kong Hailiang Metal Trading Limited	506,914	KG	3,396,323.80
2018	HKYN180412	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	99,319	KG	670,403.25
2018	HKYNV1803LD305-1	CONGO	Hong Kong Hailiang Metal Trading Limited	305,250	KG	2,075,700.00
2018	HKYN18MIT04-1000	INDONESIA	Hong Kong Hailiang Metal Trading Limited	1,000,029	KG	6,700,194.30
2018	HKYNV1804PPC200I	INDONESIA	Hong Kong Hailiang Metal Trading Limited	200,000	KG	1,400,000.00
2018	HKYN18MIT0402-10	CHINA	Hong Kong Hailiang Metal Trading Limited	991,244.200	KG	6,988,271.61
2018	JSYN1800JIN1804-	CHINA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	496,321	KG	3,523,879.10
2018	1804YT200	CHINA	Hong Kong Hailiang Metal Trading Limited	201,753	KG	1,432,446.30
2018	HKYN180412	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	409,417	KG	2,886,799.27
2018	HKYN1805LD500 -1	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	506,347	KG	3,569,746.35

2018	HKYNV1805LD298-1	CONGO	Hong Kong Hailiang Metal Trading Limited	298,093	KG	2,096,189.98
2018	HKYN18MIT05-1000	CHINA	Hong Kong Hailiang Metal Trading Limited	996,299.200	KG	6,974,094.40
2018	HKYN1800JIN1805-	CHINA	Hong Kong Hailiang Metal Trading Limited	499,198	KG	3,469,426.10
2018	HKYN1806LD500 -	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	505,035	KG	3,525,144.30
2018	HKYN18MIT05-1000	INDONESIA	Hong Kong Hailiang Metal Trading Limited	1,000,057	KG	7,050,401.85
2018	THHKYNV180601MAR	CHINA	Chongqing Hailiang International Trade Co., Ltd.	99,676	KG	722,651.00
2018	JSHKYNV1806PPC45	INDONESIA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	450,085	KG	3,240,612.00
2018	HMYN18MIT06-1000	CHINA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	1,006,998.300	KG	7,300,737.68
2018	1806YT200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,294	KG	1,452,131.50
2018	THHKYNV180602MAR	CHINA	Chongqing Hailiang International Trade Co., Ltd.	99,272	KG	734,612.80
2018	THHKYNV180603MAR	CHINA	Chongqing Hailiang International Trade Co., Ltd.	100,004	KG	745,029.80
2018	HKYN1800JIN1806	CHINA	Hong Kong Hailiang Metal Trading Limited	497,036	KG	3,429,548.40
2018	HKYN18MIT07-1000	CHINA	Hong Kong Hailiang Metal Trading Limited	1,005,323.800	KG	6,735,669.46
2018	1807YT200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,393	KG	1,372,692.05
2018	HKYNV1807MAR200 -	INDONESIA	Hong Kong Hailiang Metal Trading Limited	200,017	KG	1,320,112.20
2018	HKYN18PC07-500B	JAPAN	Hong Kong Hailiang Metal Trading Limited	299,870	KG	1,949,155.00
2018	HKYNV1807LD300F-	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	299,496	KG	1,940,135.09
2018	HKYN18PC07-500A	JAPAN	Hong Kong Hailiang Metal Trading Limited	199,120	KG	1,294,280.00
2018	HKYNV1807LD505 -	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	505,898	KG	3,283,278.02
2018	HKYN1800JIN1807	CHINA	Hong Kong Hailiang Metal Trading Limited	496,702	KG	3,178,892.80
2018	HKYNV1807MAR98-1	CHINA	Hong Kong Hailiang Metal Trading Limited	98,029	KG	666,597.20
2018	HKYN1807LD490 -1	CHINA	Hong Kong Hailiang Metal Trading Limited	196,322	KG	1,256,460.80
2018	HKYN1807LD490 -2	CHINA	Hong Kong Hailiang Metal Trading Limited	293,664	KG	1,879,449.60
2018	HKYN18MIT07-500A	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,021	KG	3,300,138.60
2018	HKYN18MIT07-1000	CHINA	Hong Kong Hailiang Metal Trading Limited	1,002,376.200	KG	6,014,257.20
2018	HKYN1808LD500	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	504,132	KG	3,138,725.83
2018	1808YT200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,832	KG	1,255,200.00
2018	HKYN18MIT08-1000	INDONESIA	Hong Kong Hailiang Metal Trading Limited	1,000,000	KG	6,100,000.00
2018	HKYN1808LD293 -1	CHINA	Hong Kong Hailiang Metal Trading Limited	293,398	KG	1,775,057.90
2018	HKYN1808LD243 -1	CHINA	Hong Kong Hailiang Metal Trading Limited	243,206	KG	1,459,236.00
2018	JSYN1800JIN1808-	CHINA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	497,917	KG	2,937,710.30
2018	HKYNV1809LD294 -	CONGO	Hong Kong Hailiang Metal Trading Limited	294,657	KG	1,738,476.30
2018	SMYN18MIT09-1000	CHINA	HAILIANG (SINGAPORE) PTE. LTD.	1,000,362.800	KG	5,902,140.52
2019	HKYN1800JIN1811-	CHINA	Hong Kong Hailiang Metal Trading Limited	497,403	KG	3,093,846.66
2019	HKVN181217	CONGO	Hong Kong Hailiang Metal Trading Limited	598,554	KG	3,681,107.10
2019	HKYN18MIT12-1000	CHINA	Hong Kong Hailiang Metal Trading Limited	1,000,149.800	KG	6,050,906.29
2019	HKYNV1812LD300 -	CONGO	Hong Kong Hailiang Metal Trading Limited	300,721	KG	1,849,434.15
2019	HKYN1811MARU100 -	CHINA	Hong Kong Hailiang Metal Trading Limited	98,751	KG	607,318.65
2019	HKYN1211LD224 -1	CONGO	Hong Kong Hailiang Metal Trading Limited	224,121	KG	1,355,932.05
2019	HMYN18PC1201-200	CHINA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	198,195	KG	1,228,809.00
2019	HKYN19MIT01ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	500,699.500	KG	3,004,197.00
2019	HKYNV1901LD705-1	CONGO	Hong Kong Hailiang Metal Trading Limited	705,514	KG	4,247,194.28
2019	HKYN19PC01-60-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	61,921	KG	416,110.98
2019	HKYN1800JIN1812-	CHINA	Hong Kong Hailiang Metal Trading Limited	495,558	KG	3,022,903.80
2019	HKYN190121	CONGO	Hong Kong Hailiang Metal Trading Limited	498,589	KG	2,966,604.55
2019	1811JLD500-1	CONGO	Hong Kong Hailiang Metal Trading Limited	100,848	KG	606,096.48
2019	1811JLD500	CONGO	Hong Kong Hailiang Metal Trading Limited	401,041	KG	2,410,256.41
2019	HKYN19MIT01ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	1,005,111.500	KG	6,030,669.00
2019	HKYN19SM0128-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,041	KG	1,200,246.00
2019	HKYN19PC02-60-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	61,862	KG	408,351.06
2019	HKYN19MIT02ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	701,568.800	KG	4,349,726.56
2019	HKYN19MIT02ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	496,506.300	KG	3,078,339.06

2019	HKYN19MIT02ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	299,630.100	KG	1,857,706.62
2019	HKYN19SM0218-100	CHINA	Hong Kong Hailiang Metal Trading Limited	100,037.500	KG	610,228.75
2019	HKYN19SM0225-400	CHINA	Hong Kong Hailiang Metal Trading Limited	200,063	KG	1,220,384.30
2019	HKYN19SM0225-400	CHINA	Hong Kong Hailiang Metal Trading Limited	200,215	KG	1,221,311.50
2019	HKYN190118	CONGO	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	502,316	KG	3,064,127.60
2019	HKVN190220TRA	MEXICO	Hong Kong Hailiang Metal Trading Limited	489,315	KG	3,082,684.50
2019	HKVN190227TRA	CHINA	Hong Kong Hailiang Metal Trading Limited	600,791	KG	3,724,904.20
2019	HKVN190220TR	CHINA	Hong Kong Hailiang Metal Trading Limited	199,970	KG	1,219,817.00
2019	HKYN19SM0301-400	CHINA	Hong Kong Hailiang Metal Trading Limited	200,282	KG	1,291,818.90
2019	HKYN19SM0301-400	CHINA	Hong Kong Hailiang Metal Trading Limited	200,577.500	KG	1,293,724.88
2019	HKYN19GRESIK02-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	1,000,008	KG	6,300,050.40
2019	HKYN19SSCT01SOM I	CONGO	Hong Kong Hailiang Metal Trading Limited	570,003	KG	3,608,118.99
2019	HKYNV1903MITS201	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	201,237	KG	1,277,854.95
2019	HMYN19MIT0321G-1	INDONESIA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	1,000,000	KG	6,500,000.00
2019	HKYN19SM0308-400	CHINA	Hong Kong Hailiang Metal Trading Limited	200,023	KG	1,270,146.05
2019	HKYNV1903IXM705-	CONGO	Hong Kong Hailiang Metal Trading Limited	705,095	KG	4,477,353.25
2019	HKYN19PCM03-20-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	21,192	KG	148,104.74
2019	HKYNV1903IXM705-	CONGO	Hong Kong Hailiang Metal Trading Limited	705,095	KG	4,477,353.25
2019	HKYN19SM0308-400	CHINA	Hong Kong Hailiang Metal Trading Limited	200,031	KG	1,270,196.85
2019	HKYN19MIT03G-032	INDONESIA	Hong Kong Hailiang Metal Trading Limited	1,000,006	KG	6,500,039.00
2019	HKYN19MIT0325ZIJ	CHINA	Hong Kong Hailiang Metal Trading Limited	503,951.100	KG	3,275,682.15
2019	HKYNV1903JCC390-	CONGO	Hong Kong Hailiang Metal Trading Limited	390,827	KG	2,559,916.85
2019	HKYN19SM0325-400	CHINA	Hong Kong Hailiang Metal Trading Limited	200,484.500	KG	1,283,100.80
2019	HKYN19MIT0328ZIJ	CHINA	Hong Kong Hailiang Metal Trading Limited	499,601.900	KG	3,272,392.45
2019	HKYN19SM0315-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,190.500	KG	1,281,219.20
2019	HKYN19SM0325-400	CHINA	Hong Kong Hailiang Metal Trading Limited	198,593	KG	1,280,924.85
2019	HKYN19MIT0327ZIJ	CHINA	Hong Kong Hailiang Metal Trading Limited	498,253.300	KG	3,263,559.12
2019	KMMVN19ANG800	CONGO	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	791,441	KG	5,104,794.45
2019	HKYNV1903MITS200	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	200,837	KG	1,295,398.65
2019	HKYN190322-1	CONGO	Hong Kong Hailiang Metal Trading Limited	495,122	KG	3,233,146.66
2019	HKYN190322-2	CONGO	Hong Kong Hailiang Metal Trading Limited	505,563	KG	3,301,326.39
2019	HKYNV1903MITS400	CHINA	Hong Kong Hailiang Metal Trading Limited	400,541	KG	2,583,489.45
2019	HKYN19SSCT01-300	CONGO	Hong Kong Hailiang Metal Trading Limited	302,396	KG	1,965,574.00
2019	HKYNV1904IXM800-	CONGO	Hong Kong Hailiang Metal Trading Limited	392,572	KG	2,571,346.60
2019	HKYNV1904IXM800-	CONGO	Hong Kong Hailiang Metal Trading Limited	403,114	KG	2,640,396.70
2019	HKYN19PCM04-20-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	19,278	KG	134,728.35
2019	HKYNV1904MITS200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,242	KG	1,301,573.00
2019	190326DC500T	CONGO	Hong Kong Hailiang Metal Trading Limited	494,357	KG	3,253,857.77
2019	HKYNV1905MITS200	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	200,931	KG	1,296,004.95
2019	190401MIT04-800	CHINA	Hong Kong Hailiang Metal Trading Limited	803,648.700	KG	5,223,716.55
2019	HKYN19ZIJIN04-70	CHINA	Hong Kong Hailiang Metal Trading Limited	701,043.100	KG	4,556,780.15
2019	HMYN19MIT04GRES I	INDONESIA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	899,994	KG	5,831,961.12
2019	HKYN19GRESIK04-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	100,007	KG	648,045.36
2019	HKVN19513TRA	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	99,370	KG	616,094.00
2019	HKYN19MIT05ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	698,892.400	KG	4,298,188.26
2019	1904LD500	CONGO	Hong Kong Hailiang Metal Trading Limited	515,140	KG	3,369,015.60
2019	HKYNV1905MIT1000	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,000	KG	3,050,000.00
2019	HKYNV1905MIT1000	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,000	KG	3,050,000.00
2019	HKYNV19MIT05ZIJ I	CHINA	Hong Kong Hailiang Metal Trading Limited	803,902.700	KG	4,944,001.61
2019	HKYNV1906IXM500	CONGO	Hong Kong Hailiang Metal Trading Limited	508,456	KG	3,065,989.68
2019	HMYN19MIT06-1500	CHINA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	500,833.300	KG	3,035,049.80
2019	HMYN19MIT06-1500	CHINA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	502,501.200	KG	3,045,157.27

2019	HKYN19SM0625-200	CHINA	Hong Kong Hailiang Metal Trading Limited	199,940.500	KG	1,199,643.00
2019	HMYN19MIT06-1500	CHINA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	500,731.700	KG	3,034,434.10
2019	HKYNV1906HKJS500	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,001	KG	3,130,006.26
2019	HKYNV1906MARU200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,167	KG	1,222,019.54
2019	HKYN19SM0627-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,565.500	KG	1,203,393.00
2019	HKYN19SM0628-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,094.500	KG	1,200,567.00
2019	HKYNV1906TLD300	R.KOREA	Hong Kong Hailiang Metal Trading Limited	299,691	KG	1,861,081.11
2019	HKVN0628YUNNAN	CHINA	Hong Kong Hailiang Metal Trading Limited	199,937	KG	1,191,624.52
2019	HKYN19SM0709-200	CHINA	Hong Kong Hailiang Metal Trading Limited	203,927	KG	1,203,169.30
2019	HKYN19MIT07ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	1,000,881.600	KG	6,005,289.60
2019	HKYN1907HKJS1000	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,002	KG	2,990,011.96
2019	VN1907LD500	CONGO	Hong Kong Hailiang Metal Trading Limited	493,805	KG	2,888,759.25
2019	HKYN19SM0716-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,336	KG	1,202,016.00
2019	HKYN19MIT07ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	496,911.700	KG	2,981,470.20
2019	HKYN1907HKJS500	INDONESIA	Hong Kong Hailiang Metal Trading Limited	499,994	KG	2,989,964.12
2019	HKYN19SM0712-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,496	KG	1,182,926.40
2019	HKVN1907213TRA	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	213,397	KG	1,248,372.45
2019	HKYN19SM0726-200	CHINA	Hong Kong Hailiang Metal Trading Limited	201,069	KG	1,206,414.00
2019	HKYN19SM0719-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,054.500	KG	1,180,321.55
2019	HKYN190MARU200-1	CHINA	Hong Kong Hailiang Metal Trading Limited	199,591	KG	1,216,706.74
2019	HKVN190723YN	CHINA	Hong Kong Hailiang Metal Trading Limited	200,128	KG	1,210,774.40
2019	HKYN19SM0723-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,039.500	KG	1,200,237.00
2019	HKYN19SM0718-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,054.500	KG	1,180,321.55
2019	HKYN19SM0731-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,309.500	KG	1,191,841.53
2019	HKYN19MIT08ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	503,560.300	KG	2,945,827.76
2019	HKYN1908IXM1000	CONGO	Hong Kong Hailiang Metal Trading Limited	498,136	KG	3,013,722.80
2019	HKYNV1908IXM1000	CONGO	Hong Kong Hailiang Metal Trading Limited	497,085	KG	3,007,364.25
2019	HKYN19SM0813-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,181	KG	1,161,049.80
2019	HKYNV1908JT700-1	CHINA	Hong Kong Hailiang Metal Trading Limited	497,577	KG	2,990,437.77
2019	HKYNV1908JT700-2	CHINA	Hong Kong Hailiang Metal Trading Limited	199,337	KG	1,198,015.37
2019	HKYN19SM0802-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,640.500	KG	1,177,759.74
2019	HKYN19MIT08ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	504,165.400	KG	2,949,367.59
2019	SINYN1908RTM1000	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	500,027	KG	2,965,160.11
2019	HKYN19PCM08-40-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	40,493	KG	281,304.87
2019	HKYNV908JTG500-2	INDONESIA	Hong Kong Hailiang Metal Trading Limited	300,027	KG	1,824,164.16
2019	HKYNV1908JTP500-	CONGO	Hong Kong Hailiang Metal Trading Limited	489,184	KG	2,881,293.76
2019	SINYN1908RTM1000	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	499,972	KG	2,964,833.96
2019	HKYN1908MARU200-	CHINA	Hong Kong Hailiang Metal Trading Limited	203,150	KG	1,244,700.05
2019	HKYN19MIT08ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	499,071.400	KG	2,919,567.69
2019	HKYNV1908JTG500-	INDONESIA	Hong Kong Hailiang Metal Trading Limited	199,999	KG	1,215,993.92
2019	HKYN19SM0820-200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,423.500	KG	1,162,456.30
2019	VN1908SSCT270	CONGO	Hong Kong Hailiang Metal Trading Limited	265,398	KG	1,539,308.40
2019	HKVN1900827YN	CHINA	Hong Kong Hailiang Metal Trading Limited	200,288	KG	1,167,679.04
2019	HKYN19MIT09ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	499,764.900	KG	2,898,636.42
2019	HKYN19SM0903-200	CHINA	Hong Kong Hailiang Metal Trading Limited	199,440	KG	1,126,836.00
2019	HKYNV1909XIM700-	CONGO	Hong Kong Hailiang Metal Trading Limited	696,644	KG	4,145,031.80
2019	HKYN1909RTM1000-	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,006	KG	2,915,034.98
2019	HKYN1909IXM300-1	CONGO	Hong Kong Hailiang Metal Trading Limited	301,454	KG	1,727,331.42
2019	HKYN1909RTM1000	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,014	KG	2,915,081.62
2019	HKYN19MIT09ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	503,063.100	KG	2,917,765.98
2019	VN1908TOYOTA400	INDONESIA	Hong Kong Hailiang Metal Trading Limited	400,005	KG	2,368,029.60
2019	HKYNV1909JTG400	INDONESIA	Hong Kong Hailiang Metal Trading Limited	400,022	KG	2,344,128.92

2019	HKYNV1909JT300-1	CONGO	Hong Kong Hailiang Metal Trading Limited	293,949	KG	1,678,448.79
2019	HKYN19MIT09ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	503,132.700	KG	2,918,169.66
2019	HKYNV1910IXM500-	CONGO	Hong Kong Hailiang Metal Trading Limited	510,976	KG	2,963,660.80
2019	HKYN190921	CHINA	Hong Kong Hailiang Metal Trading Limited	500,177	KG	2,926,035.45
2019	HKNYN19MIT09ZIJH	CHINA	Hong Kong Hailiang Metal Trading Limited	500,387.400	KG	2,902,246.92
2019	HKYNV1910IXM500B	CONGO	Hong Kong Hailiang Metal Trading Limited	509,244	KG	2,963,800.08
2019	HKYN1910MARU200	CHINA	Hong Kong Hailiang Metal Trading Limited	197,028	KG	1,158,130.58
2019	HKYN19MITZIJIN	CHINA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	504,510.600	KG	2,951,387.01
2019	HMYN19MITZIJIN	CHINA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	506,555.400	KG	2,963,349.09
2019	HKYN19PCM11-20	JAPAN	Hong Kong Hailiang Metal Trading Limited	21,501	KG	145,884.29
2019	HKYNV1911IXM450	CONGO	Hong Kong Hailiang Metal Trading Limited	452,427	KG	2,682,892.11
2019	HKYN191104	INDONESIA	Hong Kong Hailiang Metal Trading Limited	199,960	KG	1,179,764.00
2019	HKYN191108	MYANMAR	Hong Kong Hailiang Metal Trading Limited	294,000	KG	1,734,600.00
2019	HKYNV19010JT400	CONGO	Hong Kong Hailiang Metal Trading Limited	413,419	KG	2,381,293.44
2019	HKYN1911RTM700-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	700,003	KG	4,130,017.70
2019	HKYN19ZIJIN11-15	CHINA	Hong Kong Hailiang Metal Trading Limited	503,654.600	KG	2,996,744.87
2019	HKJSYNV1921IXM50	CONGO	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	491,647	KG	2,925,299.65
2019	HKYN19ZIJIN11-15	CHINA	Hong Kong Hailiang Metal Trading Limited	301,137.200	KG	1,791,766.34
2019	HKYN1912BTR100-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	102,155	KG	602,714.50
2019	HKVN191204TRA	U.S.A.	Hong Kong Hailiang Metal Trading Limited	419,296	KG	2,440,302.72
2019	HKYN191202-1	MYANMAR	Hong Kong Hailiang Metal Trading Limited	98,000	KG	578,200.00
2019	HKYN191202-2	MYANMAR	Hong Kong Hailiang Metal Trading Limited	196,000	KG	1,156,400.00
2019	HKYN19ZIJUN11-15	CHINA	Hong Kong Hailiang Metal Trading Limited	498,678.400	KG	2,967,136.48
2019	HKYN191203-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	200,003	KG	1,180,017.70
2019	HKYN19ZIJUN11-15	CHINA	Hong Kong Hailiang Metal Trading Limited	200,612.100	KG	1,193,642.00
2019	HKYNV1911JT400-1	CONGO	Hong Kong Hailiang Metal Trading Limited	399,518	KG	2,449,045.34
2019	HKYN19MIT12ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	491,802.900	KG	3,024,587.84
2020	HKJSNV2001RTM500	INDONESIA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	500,028	KG	3,065,171.64
2020	HMYN20ZIJIN01-5	CHINA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	499,873.900	KG	3,074,224.49
2020	HMYN20PASAR01-50	PHILPIN	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	497,726	KG	3,061,014.90
2020	HKYNV2001JINFENG	CHINA	Hong Kong Hailiang Metal Trading Limited	500,935	KG	3,080,750.25
2020	HKYNV1912BTR200	INDONESIA	Hong Kong Hailiang Metal Trading Limited	203,272	KG	1,239,959.20
2020	HKYN19MIT12ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	498,051.600	KG	3,063,017.34
2020	HKYN19SM1227-100	CHINA	Hong Kong Hailiang Metal Trading Limited	100,806	KG	619,956.90
2020	HKYN19SM1231-100	CHINA	Hong Kong Hailiang Metal Trading Limited	99,196.500	KG	610,058.48
2020	HKYN191228	MYANMAR	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	294,000	KG	1,808,100.00
2020	VN2001PPC1800-3	JAPAN	Hong Kong Hailiang Metal Trading Limited	297,834	KG	1,861,462.50
2020	VN2001PPC1800-2	JAPAN	Hong Kong Hailiang Metal Trading Limited	294,882	KG	1,843,012.50
2020	VN2001PPC1800-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	196,143	KG	1,225,893.75
2020	HKYN191223	INDONESIA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	200,006	KG	1,230,036.90
2020	VN2001PPC1800-3	INDONESIA	Hong Kong Hailiang Metal Trading Limited	299,996	KG	1,874,975.00
2020	HKYN2002MAURU200	MYANMAR	Hong Kong Hailiang Metal Trading Limited	196,000	KG	1,146,600.00
2020	VN2001PPC1800-5	JAPAN	Hong Kong Hailiang Metal Trading Limited	699,971	KG	4,374,818.75
2020	VN2002SSWC500	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	506,634	KG	3,065,135.70
2020	VN2001SSW500	CHINA	Hong Kong Hailiang Metal Trading Limited	500,284	KG	3,126,775.00
2020	VN2001SSW40	CHINA	Hong Kong Hailiang Metal Trading Limited	200,057	KG	1,250,356.25
2020	HKYN2001PP500B-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	199,526	KG	1,247,037.50
2020	HKYN2001PP500B-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	299,721	KG	1,873,256.25
2020	HKYN2002MAURU400	MYANMAR	Hong Kong Hailiang Metal Trading Limited	391,999	KG	2,449,993.75
2020	HKYN2001PP500B	JAPAN	Hong Kong Hailiang Metal Trading Limited	500,965	KG	3,131,031.25
2020	HKYN2001PCM20	JAPAN	Hong Kong Hailiang Metal Trading Limited	21,597	KG	142,540.20
2020	DPCVNM000189	CONGO	Hong Kong Hailiang Metal Trading Limited	375,678	KG	2,310,419.70

2020	HKYNV2001FY500-1	CHINA	Hong Kong Hailiang Metal Trading Limited	501,441	KG	3,134,006.25
2020	HKSH2001PP500A-1	PHILPIN	Hong Kong Hailiang Metal Trading Limited	498,743	KG	3,117,143.75
2020	HKYNV2001JT23-1	CONGO	Hong Kong Hailiang Metal Trading Limited	23,821	KG	147,332.89
2020	HKYNV2001BTR200-	INDONESIA	Hong Kong Hailiang Metal Trading Limited	203,821	KG	1,263,690.20
2020	HKYNV2002BTR400	INDONESIA	Hong Kong Hailiang Metal Trading Limited	203,618	KG	1,160,622.60
2020	HKYN200205	CONGO	Hong Kong Hailiang Metal Trading Limited	139,170	KG	814,144.50
2020	SINY2002RTM500	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	499,997	KG	2,854,982.87
2020	HKYNV2002BTR400	INDONESIA	Hong Kong Hailiang Metal Trading Limited	203,048	KG	1,157,373.60
2020	HKYNV2001IXM750	CONGO	Hong Kong Hailiang Metal Trading Limited	247,249	KG	1,532,943.80
2020	HKYNV2001IXM750-	CONGO	Hong Kong Hailiang Metal Trading Limited	491,031	KG	3,044,392.20
2020	HKYN1200130	CONGO	Hong Kong Hailiang Metal Trading Limited	264,942	KG	1,549,910.70
2020	HKYN2001MARU500	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,007	KG	2,925,040.95
2020	HKVN200204TRA	CONGO	Hong Kong Hailiang Metal Trading Limited	501,785	KG	2,935,442.25
2020	SGPYN2002PPC300	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	299,999	KG	1,799,994.00
2020	SGPYN20MIT02ZIJJ	CHINA	HAILIANG (SINGAPORE) PTE. LTD.	499,951.300	KG	2,899,717.54
2020	HKYN19MIT12JIN-	CHINA	Hong Kong Hailiang Metal Trading Limited	497,536.400	KG	3,084,725.68
2020	SGPYN2002PPC500A	JAPAN	HAILIANG (SINGAPORE) PTE. LTD.	196,461	KG	1,178,766.00
2020	HKYNV2001TRAX202	CONGO	Hong Kong Hailiang Metal Trading Limited	202,003	KG	1,252,418.60
2020	HKYNV2001AIC200	MONGOL	Hong Kong Hailiang Metal Trading Limited	200,348	KG	1,232,140.20
2020	SGPY2002PPC500	JAPAN	HAILIANG (SINGAPORE) PTE. LTD.	496,181	KG	2,977,086.00
2020	SGPYN2002PPC500A	JAPAN	HAILIANG (SINGAPORE) PTE. LTD.	294,916	KG	1,769,496.00
2020	SGPYN2002PPC1000	JAPAN	HAILIANG (SINGAPORE) PTE. LTD.	498,872	KG	2,993,232.00
2020	SGPYN2002PPC1000	JAPAN	HAILIANG (SINGAPORE) PTE. LTD.	501,489	KG	2,938,725.54
2020	HKYN20WB0308-800	MYANMAR	Hong Kong Hailiang Metal Trading Limited	783,998	KG	4,468,788.60
2020	HKYN2002PS300-2	JAPAN	Hong Kong Hailiang Metal Trading Limited	199,716	KG	1,184,315.88
2020	HKYN2002PS300-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	100,013	KG	593,077.09
2020	SINYN2003JCC700-	CHINA	HAILIANG (SINGAPORE) PTE. LTD.	100,150	KG	575,862.50
2020	HKVN2002PP500-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	498,052	KG	2,863,799.00
2020	SINYN2003JCC700-	CHINA	HAILIANG (SINGAPORE) PTE. LTD.	600,170	KG	3,450,977.50
2020	SINYN2003RTM500	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	500,000	KG	2,875,000.00
2020	HKYNV2003BTR400	INDONESIA	Hong Kong Hailiang Metal Trading Limited	202,888	KG	1,160,519.36
2020	HKYNV2003BTR400	INDONESIA	Hong Kong Hailiang Metal Trading Limited	203,521	KG	1,164,140.12
2020	HKVN200224TR	CONGO	Hong Kong Hailiang Metal Trading Limited	500,648	KG	2,953,823.20
2020	SGPYN20MIT03ZIJJ	CHINA	HAILIANG (SINGAPORE) PTE. LTD.	499,229.300	KG	2,845,607.01
2020	HKVN200227TR	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	293,326	KG	1,730,623.40
2020	SGVN20TR02-250	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	250,659	KG	1,466,355.15
2020	HKVN200306TRA2	CONGO	Hong Kong Hailiang Metal Trading Limited	510,194	KG	3,061,164.00
2020	SGPYN20PPC03-130	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	300,014	KG	1,728,080.64
2020	HKVN2002PP200-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	199,666	KG	1,148,079.50
2020	SGVN20TR02-387	BRAZIL	HAILIANG (SINGAPORE) PTE. LTD.	387,051	KG	2,322,306.00
2020	SGVN19TRA12-500	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	497,400	KG	2,909,790.00
2020	HKVN200306TRA1	CONGO	Hong Kong Hailiang Metal Trading Limited	503,439	KG	3,020,634.00
2020	HKYN2019JLD	CONGO	Hong Kong Hailiang Metal Trading Limited	498,029	KG	2,863,666.75
2020	VN2002PS500-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	299,123	KG	1,690,044.95
2020	VN2003JLD500T-1	CONGO	Hong Kong Hailiang Metal Trading Limited	323,562	KG	1,876,659.60
2020	VN2002PS500-2	JAPAN	Hong Kong Hailiang Metal Trading Limited	199,299	KG	1,126,039.35
2020	VN2002JD500	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	504,872	KG	3,024,183.28
2020	VN2003JLD500T-2	CONGO	Hong Kong Hailiang Metal Trading Limited	185,905	KG	920,229.75
2020	20HKYN04MARU500A	INDONESIA	Hong Kong Hailiang Metal Trading Limited	499,986	KG	2,399,932.80
2020	HKYN0316JLD	CONGO	Hong Kong Hailiang Metal Trading Limited	503,466	KG	2,884,860.18
2020	SINYN2004RTM500	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	500,009	KG	2,400,043.20
2020	HKYNV2004BTR400	INDONESIA	Hong Kong Hailiang Metal Trading Limited	101,925	KG	499,432.50

2020	HKYNV2004BTR400	INDONESIA	Hong Kong Hailiang Metal Trading Limited	101,739	KG	498,521.10
2020	SGPYN20PPC03-100	JAPAN	HAILIANG (SINGAPORE) PTE. LTD.	492,230	KG	2,707,265.00
2020	SGPYN20PP03-1000	JAPAN	HAILIANG (SINGAPORE) PTE. LTD.	490,514	KG	2,844,981.20
2020	SGPN20PPC03-1000	JAPAN	HAILIANG (SINGAPORE) PTE. LTD.	490,659	KG	2,845,822.20
2020	SGPYN20PPC03-100	JAPAN	HAILIANG (SINGAPORE) PTE. LTD.	490,547	KG	2,698,008.50
2020	HKVN200330TRA	CONGO	Hong Kong Hailiang Metal Trading Limited	414,086	KG	2,070,430.00
2020	20HKYN04MARU500B	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,004	KG	2,400,019.20
2020	VN2003IXM1000-1	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	517,697	KG	2,966,403.81
2020	VN2003IXM1000-2	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	485,226	KG	2,780,344.98
2020	SGPYN20PPC04-300	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	300,003	KG	1,470,014.70
2020	20HKYN04MARU300-	MYANMAR	Hong Kong Hailiang Metal Trading Limited	392,000	KG	1,920,800.00
2020	HKYN20MIT04ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	495,447.800	KG	2,477,239.00
2020	HKVN200416TRA	CONGO	Hong Kong Hailiang Metal Trading Limited	199,043	KG	995,215.00
2020	HKVN200402TRA	CONGO	Hong Kong Hailiang Metal Trading Limited	217,269	KG	1,086,345.00
2020	HKYVN2004TRA500	CONGO	Hong Kong Hailiang Metal Trading Limited	500,439	KG	2,512,203.78
2020	HKYN0413JT-1	CHINA	Hong Kong Hailiang Metal Trading Limited	500,168	KG	2,575,865.20
2020	HKYN0413JT-2	CHINA	Hong Kong Hailiang Metal Trading Limited	502,850	KG	2,589,677.50
2020	SGPYN20PPC05-300	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	300,000	KG	1,560,000.00
2020	HKYN0430JLD	CONGO	Hong Kong Hailiang Metal Trading Limited	501,973	KG	2,580,141.22
2020	HKYNV2004BTR400	INDONESIA	Hong Kong Hailiang Metal Trading Limited	204,109	KG	1,000,134.10
2020	HKVN200402TRA	CONGO	Hong Kong Hailiang Metal Trading Limited	217,269	KG	1,086,345.00
2020	HKVN200330TRA	CONGO	Hong Kong Hailiang Metal Trading Limited	414,086	KG	2,070,430.00
2020	HKYNV2004TRA500-	CONGO	Hong Kong Hailiang Metal Trading Limited	500,439	KG	2,512,203.78
2020	HKVN200416TRA	CONGO	Hong Kong Hailiang Metal Trading Limited	199,043	KG	995,215.00
2020	VN2003IXM1000-2	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	485,226	KG	2,780,344.98
2020	VN2003IXM1000-1	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	517,697	KG	2,966,403.81
2020	HKYN20MIT04ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	495,447.800	KG	2,477,239.00
2020	HKYN0413JT-1	CHINA	Hong Kong Hailiang Metal Trading Limited	500,168	KG	2,575,865.20
2020	HKYN0413JT-2	CHINA	Hong Kong Hailiang Metal Trading Limited	502,850	KG	2,589,677.50
2020	VN2003JLD500T-2	CONGO	Hong Kong Hailiang Metal Trading Limited	185,905	KG	920,229.75
2020	HKYN0316JLD	CONGO	Hong Kong Hailiang Metal Trading Limited	503,466	KG	2,884,860.18
2020	VN2004IXM1000-1	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	507,569	KG	2,537,845.00
2020	VN2004IM1000-2	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	481,841	KG	2,409,205.00
2020	VN2004IXM1000-2	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	481,841	KG	2,409,205.00
2020	VN2004IXM1000-1	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	507,569	KG	2,537,845.00
2020	HKVN2000606TRA	BELGIUM	Hong Kong Hailiang Metal Trading Limited	500,937	KG	2,705,059.80
2020	SGPYN20PPC05-400	MYANMAR	HAILIANG (SINGAPORE) PTE. LTD.	392,003	KG	2,103,880.10
2020	20HKYN0699C300-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	300,000	KG	1,644,000.00
2020	20HKYN06PPC500A	JAPAN	Hong Kong Hailiang Metal Trading Limited	490,559	KG	2,742,224.81
2020	20HKYN09PPC500B	JAPAN	Hong Kong Hailiang Metal Trading Limited	490,532	KG	2,697,926.00
2020	HKYNV2006BTR200-	INDONESIA	Hong Kong Hailiang Metal Trading Limited	203,844	KG	1,121,142.00
2020	20HKYN06MARU400	MYANMAR	Hong Kong Hailiang Metal Trading Limited	392,000	KG	2,214,800.00
2020	HKYN20JNK0708-50	CONGO	Hong Kong Hailiang Metal Trading Limited	498,420	KG	2,940,678.00
2020	ONO20070001	JAPAN	PANASONIC MANAGEMENT(THAILAND)CO.LT	78,834	KG	451,718.82
2020	20HKYN07PPC500A	JAPAN	Hong Kong Hailiang Metal Trading Limited	196,439	KG	1,178,634.00
2020	20HKYN07PPC500A	JAPAN	Hong Kong Hailiang Metal Trading Limited	294,907	KG	1,769,442.00
2020	20HKYN07PPC300G	INDONESIA	Hong Kong Hailiang Metal Trading Limited	300,001	KG	1,800,006.00
2020	HKYN20MIT06ZIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	498,001.600	KG	2,813,709.04
2020	HKYNV2007BTR200	INDONESIA	Hong Kong Hailiang Metal Trading Limited	203,771	KG	1,283,757.30
2020	HKYN2006RTM500-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,015	KG	2,800,084.00
2020	20HKYN007MARU400	MYANMAR	Hong Kong Hailiang Metal Trading Limited	392,009	KG	2,555,898.68
2020	HKYN2007RTM500-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,009	KG	3,075,055.35

2020	HKYN2007BHP300-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	302,132	KG	1,903,431.60
2020	HKVN200724TRA2	INDONESIA	Hong Kong Hailiang Metal Trading Limited	499,747	KG	3,073,444.05
2020	HKVN200724TRA1	CHINA	Hong Kong Hailiang Metal Trading Limited	496,071	KG	3,050,836.65
2020	HKYNV200LD389-1	CONGO	Hong Kong Hailiang Metal Trading Limited	389,658	KG	2,493,811.20
2020	HKYNV2007SGT200-	INDONESIA	Hong Kong Hailiang Metal Trading Limited	200,041	KG	1,238,253.79
2020	HKYNV2007SGT300	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	301,388	KG	1,865,591.72
2020	HKYN20MIT07ZLIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	499,819.600	KG	3,048,899.56
2020	HKYN2008RTM500-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,031	KG	3,125,193.75
2020	HKYN20WB0308-800	MYANMAR	Hong Kong Hailiang Metal Trading Limited	980,333	KG	6,323,147.85
2020	HKYN20WB0809-100	MYANMAR	Hong Kong Hailiang Metal Trading Limited	979,990	KG	6,320,935.50
2020	HKYN20MIT08ZLIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	496,035.900	KG	3,125,026.17
2020	20HKYN08PPC700-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	686,346	KG	4,310,287.20
2020	20HKYN08PPC500A	JAPAN	Hong Kong Hailiang Metal Trading Limited	492,349	KG	3,152,904.53
2020	20HKYNV08PPC300	INDONESIA	Hong Kong Hailiang Metal Trading Limited	300,054	KG	1,933,998.06
2020	HKKYNV2008BHP302	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	302,096	KG	1,879,037.12
2020	HKYNV2008BTR400	INDONESIA	Hong Kong Hailiang Metal Trading Limited	203,305	KG	1,280,821.50
2020	HKYNV2008BTR400	INDONESIA	Hong Kong Hailiang Metal Trading Limited	203,201	KG	1,280,166.30
2020	20HKKYN07PPC300	JAPAN	Hong Kong Hailiang Metal Trading Limited	296,411	KG	1,867,389.30
2020	20HKYN07PPC200-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	197,142	KG	1,241,994.60
2020	20HKYNZJ08PPC500	JAPAN	Hong Kong Hailiang Metal Trading Limited	490,044	KG	3,042,658.69
2020	HKYNV2008GLD313	CONGO	Hong Kong Hailiang Metal Trading Limited	313,661	KG	2,038,796.50
2020	MITSU1550-1	CHINA	Hong Kong Hailiang Metal Trading Limited	551,358	KG	3,484,582.56
2020	20HKYN08MARU400-	MYANMAR	Hong Kong Hailiang Metal Trading Limited	392,000	KG	2,476,773.60
2020	HKYN20JNK0912-60	CONGO	Hong Kong Hailiang Metal Trading Limited	599,780	KG	3,838,592.00
2020	HKYN2008IXM500-1	CONGO	Hong Kong Hailiang Metal Trading Limited	495,653	KG	3,296,092.45
2020	HKYN2009RTM500-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	499,999	KG	3,249,993.50
2020	20HKYN09PPC300G	INDONESIA	Hong Kong Hailiang Metal Trading Limited	300,035	KG	1,950,227.50
2020	HKYN20WB0816-500	CONGO	Hong Kong Hailiang Metal Trading Limited	496,039	KG	3,224,253.50
2020	HKYN20JNK0829-50	CONGO	Hong Kong Hailiang Metal Trading Limited	498,560	KG	3,140,928.00
2020	HKSH2007IXM500-1	CONGO	Hong Kong Hailiang Metal Trading Limited	498,089	KG	3,262,482.95
2020	20HKYN08PPC500B	JAPAN	Hong Kong Hailiang Metal Trading Limited	491,401	KG	3,136,784.57
2020	INVCH2008-061	CHINA	ARC RESOURCES COMPANY LIMITED	498,965	KG	3,219,057.73
2020	INVCH2008-062	CHINA	ARC RESOURCES COMPANY LIMITED	500,450	KG	3,228,638.16
2020	HKVN08TRA875A	CHINA	Hong Kong Hailiang Metal Trading Limited	374,984	KG	2,381,148.40
2020	HKVN08TRA875B	CHINA	Hong Kong Hailiang Metal Trading Limited	500,736	KG	3,179,673.60
2020	HKYN08TRA489	CONGO	Hong Kong Hailiang Metal Trading Limited	489,820.600	KG	3,110,360.81
2020	ONO20080001	JAPAN	PANASONIC MANAGEMENT(THAILAND)CO.LT	99,655	KG	571,023.15
2020	ONO20090001	JAPAN	PANASONIC MANAGEMENT(THAILAND)CO.LT	60,231	KG	345,123.63
2020	VN2002PPC200-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	198,244	KG	1,318,322.60
2020	HKYN20MIT09ZLIJIN	CHINA	Hong Kong Hailiang Metal Trading Limited	499,734.500	KG	3,298,247.70
2020	HKTH2008KGHM482	POLAND	Hong Kong Hailiang Metal Trading Limited	482,682	KG	3,161,567.10
2020	HKYN20ALBUM1003	CONGO	Hong Kong Hailiang Metal Trading Limited	201,930	KG	1,332,738.00
2020	HKYN20TRA09-526	CONGO	Hong Kong Hailiang Metal Trading Limited	526,377	KG	2,947,711.20
2020	HKYN09TRA512	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	512,897	KG	3,385,120.20
2020	ONO20100002	INDONESIA	PANASONIC MANAGEMENT(THAILAND)CO.LT	79,999	KG	458,394.27
2020	HKYN2011RTM500-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	300,015	KG	2,115,105.75
2020	HKYN2010RTM500-2	INDONESIA	Hong Kong Hailiang Metal Trading Limited	300,007	KG	2,010,046.90
2020	HKYN2010RTM500-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	199,999	KG	1,339,993.30
2020	HKYNV2010BTR160-	INDONESIA	Hong Kong Hailiang Metal Trading Limited	162,962	KG	1,108,141.60
2020	20HKYN11PPC300G-	INDONESIA	Hong Kong Hailiang Metal Trading Limited	299,962	KG	2,080,236.47
2020	2011MITSU500-1	CHINA	HAILIANG (SINGAPORE) PTE. LTD.	499,914	KG	3,424,410.90
2020	SGPYN20MIT11ZIJJ	CHINA	HAILIANG (SINGAPORE) PTE. LTD.	197,793.600	KG	1,394,444.88

2020	HKYN2011RTM500-2	INDONESIA	Hong Kong Hailiang Metal Trading Limited	199,991	KG	1,409,936.55
2020	HKYN20TRA12-JNMC	CHINA	Hong Kong Hailiang Metal Trading Limited	493,135	KG	3,698,512.50
2020	HKYN20MIT12ZLIJN	CHINA	Hong Kong Hailiang Metal Trading Limited	299,123,100	KG	2,243,423.25
2020	SGPYN20MIT11ZIJJ	CHINA	HAILIANG (SINGAPORE) PTE. LTD.	298,021,700	KG	2,101,052.99
2020	HKYN2012SKY250-1	CHINA	Hong Kong Hailiang Metal Trading Limited	249,492	KG	1,896,139.20
2020	HKYN2012SKY249-1	CHINA	Hong Kong Hailiang Metal Trading Limited	249,201	KG	1,893,927.60
2020	VN2011NF400-1	MYANMAR	Hong Kong Hailiang Metal Trading Limited	196,000	KG	1,470,000.00
2020	HKYN20TRA12-JNMC	CHINA	Hong Kong Hailiang Metal Trading Limited	493,534	KG	3,701,505.00
2020	SINYNV2012TRAXY2	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	203,400	KG	1,576,350.00
2020	HKYN20TRA12-GABY	CHILE	Hong Kong Hailiang Metal Trading Limited	177,684	KG	1,368,166.80
2020	SINYNV2012BHP202	AUSTRALIA	HAILIANG (SINGAPORE) PTE. LTD.	202,300	KG	1,567,825.00
2020	HKVN20BHP11-300-	AUSTRALIA	HONGKONG HAILIANG METAL MATERIALS CO., LIMITED	302,808	KG	2,149,936.80
2021	HKYN20SM12-400-1	CHINA	Hong Kong Hailiang Metal Trading Limited	199,349,500	KG	1,554,926.10
2021	HKYN2012SKY498-1	CHINA	Hong Kong Hailiang Metal Trading Limited	498,147	KG	3,885,546.60
2021	HKYN20SM12-400-2	CHINA	Hong Kong Hailiang Metal Trading Limited	201,772,500	KG	1,573,825.50
2021	HKYN21TRA01-JCC-	CHINA	Hong Kong Hailiang Metal Trading Limited	99,976	KG	799,808.00
2021	HKYNV2101TRA48-1	CONGO	Hong Kong Hailiang Metal Trading Limited	48,126	KG	387,414.30
2021	HKYN21TR01-1000-	CHINA	Hong Kong Hailiang Metal Trading Limited	502,043,500	KG	4,016,348.00
2021	HKYN21TRA01-1000	CHINA	Hong Kong Hailiang Metal Trading Limited	502,166	KG	4,017,328.00
2021	SINYNV2101TRAXY2	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	204,835	KG	1,607,954.75
2021	HKYN20TRA12-25CM	CONGO	Hong Kong Hailiang Metal Trading Limited	25,517	KG	201,584.30
2021	21HKYN01PPC300G-HKYN21TRA01-CM31	INDONESIA	Hong Kong Hailiang Metal Trading Limited	300,002	KG	2,401,516.01
2021		CONGO	Hong Kong Hailiang Metal Trading Limited	315,818	KG	2,494,962.20
2021	21HKYN01PPC200-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	200,172	KG	1,622,494.15
2021	HKYN2011RTM500-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	200,003	KG	1,600,024.00
2021	HKYN20WB12-300-1	CONGO	Hong Kong Hailiang Metal Trading Limited	297,120	KG	2,287,824.00
2021	HKYN20TRA12-200C	CONGO	Hong Kong Hailiang Metal Trading Limited	199,921	KG	1,539,391.70
2021	HKYN20TRA12-ISA	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	225,655	KG	1,760,109.00
2021	VN2011NF400-2	MYANMAR	Hong Kong Hailiang Metal Trading Limited	195,995	KG	1,430,763.50
2021	VN2012IXM500-2	CONGO	Hong Kong Hailiang Metal Trading Limited	279,434	KG	2,193,556.90
2021	VN2012IXM500-1	CONGO	Hong Kong Hailiang Metal Trading Limited	207,119	KG	1,625,884.15
2021	RM210002	JAPAN	Loyal Hailiang Copper (Thailand) Co	251,140	KG	1,995,759.35
2021	20HKYN12PPC500-2	JAPAN	Hong Kong Hailiang Metal Trading Limited	196,304	KG	1,473,300.78
2021	RM210001	JAPAN	Loyal Hailiang Copper (Thailand) Co	48,220	KG	383,194.70
2021	VN2101IXM500-2	CONGO	Hong Kong Hailiang Metal Trading Limited	194,816	KG	1,566,320.64
2021	VN2101SSCT410	CONGO	Hong Kong Hailiang Metal Trading Limited	413,511	KG	3,349,439.10
2021	VN2101IXM500-1	CONGO	Hong Kong Hailiang Metal Trading Limited	297,737	KG	2,393,805.48
2021	HKYN20WB588-1	MYANMAR	Hong Kong Hailiang Metal Trading Limited	588,000	KG	4,733,400.00
2021	SINTH2101KGHM507	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	507,478	KG	3,983,702.30
2021	HKYN21TRA01-JN50	CHINA	Hong Kong Hailiang Metal Trading Limited	492,239	KG	3,937,912.00
2021	HKYN20TRA12-273C	CONGO	Hong Kong Hailiang Metal Trading Limited	273,394	KG	2,132,473.20
2021	HKYN20WB490-1	MYANMAR	Hong Kong Hailiang Metal Trading Limited	490,000	KG	3,920,000.00
2021	21HKYN01PPC500A-	JAPAN	Hong Kong Hailiang Metal Trading Limited	294,657	KG	2,330,456.95
2021	21HKYN01PPC500A	JAPAN	Hong Kong Hailiang Metal Trading Limited	197,444	KG	1,561,594.47
2021	SINYNV2101BHP302	AUSTRALIA	HAILIANG (SINGAPORE) PTE. LTD.	302,776	KG	2,437,346.80
2021	HKYN2101IXM500-2	CONGO	Hong Kong Hailiang Metal Trading Limited	301,166	KG	2,409,328.00
2021	HKYN2102RTM500-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	199,995	KG	1,599,960.00
2021	HKYN2102RTM500-2	INDONESIA	Hong Kong Hailiang Metal Trading Limited	300,006	KG	2,400,048.00
2021	21HKVN01PC500-1	CHINA	Hong Kong Hailiang Metal Trading Limited	500,578	KG	4,107,242.49
2021	HKYN2101IXM500-1	CONGO	Hong Kong Hailiang Metal Trading Limited	197,804	KG	1,582,432.00
2021	HKYN2102BHP498-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	498,226	KG	3,985,808.00
2021	HKYN20WB200-1	MYANMAR	Hong Kong Hailiang Metal Trading Limited	196,000	KG	1,548,400.00

2021	SGPYN21TRA02-766	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	198,200	KG	1,545,960.00
2021	SGPYN21TRA02-766	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	196,833	KG	1,535,297.40
2021	SGPYN21TRA02-766	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	371,754	KG	2,899,681.20
2021	SGOY21TRA02-556-	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	555,069	KG	4,329,538.20
2021	21HKYN02PPC300G-	INDONESIA	Hong Kong Hailiang Metal Trading Limited	299,954	KG	2,491,117.97
2021	20HKYN12PPC500-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	295,369	KG	2,216,803.42
2021	HKYNV2102TRA153-	CONGO	Hong Kong Hailiang Metal Trading Limited	153,957	KG	1,216,260.30
2021	HKYN21MIT02-300-	CHINA	Hong Kong Hailiang Metal Trading Limited	297,685.600	KG	2,619,633.28
2021	HKYN01WB-980-1	MYANMAR	Hong Kong Hailiang Metal Trading Limited	980,002	KG	8,036,016.40
2021	HKYN2103RTM500-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,026	KG	4,400,228.80
2021	SINTH2101KGHM504	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	504,529	KG	4,036,232.00
2021	SINTH2101KGHM745	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	745,053	KG	6,034,929.30
2021	21HKYN02PPC250A-	JAPAN	Hong Kong Hailiang Metal Trading Limited	250,225	KG	2,126,912.50
2021	HKYN2102IXM591-1	CONGO	Hong Kong Hailiang Metal Trading Limited	591,464	KG	5,086,590.40
2021	HKYNV2102TRA282-	CONGO	Hong Kong Hailiang Metal Trading Limited	282,000	KG	2,256,000.00
2021	21HKVN02PC500-1	CHINA	Hong Kong Hailiang Metal Trading Limited	501,208	KG	4,262,774.04
2021	HKYN21MIT03-300-	CHINA	Hong Kong Hailiang Metal Trading Limited	299,865.400	KG	2,728,775.14
2021	HKYN21TRA02-500-	CHINA	Hong Kong Hailiang Metal Trading Limited	498,716.500	KG	4,388,705.20
2021	21HKYN02PPC500-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	490,897	KG	4,432,799.91
2021	HKYN2102METAL306	CONGO	Hong Kong Hailiang Metal Trading Limited	306,195	KG	2,755,755.00
2021	21HKYN02PPC250B-	JAPAN	Hong Kong Hailiang Metal Trading Limited	248,137	KG	2,109,164.50
2021	HKYN21WB01-310-1	CONGO	Hong Kong Hailiang Metal Trading Limited	311,526	KG	2,741,428.80
2021	HKYN2103BHP393-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	393,748	KG	3,543,732.00
2021	HKYN21WB01-314-	CONGO	Hong Kong Hailiang Metal Trading Limited	314,939	KG	2,771,463.20
2021	VN2103SSCT300	CONGO	Hong Kong Hailiang Metal Trading Limited	294,662	KG	2,651,958.00
2021	HKYN2101IXM400-1	ZAMBIA	Hong Kong Hailiang Metal Trading Limited	405,859	KG	3,733,902.80
2021	SGPYN21WB02-686-	MYANMAR	HAILIANG (SINGAPORE) PTE. LTD.	686,000	KG	6,345,500.00
2021	SGPYN21WB02-200-	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	198,778	KG	1,808,879.80
2021	21HKVN03PC500-2	CHINA	Hong Kong Hailiang Metal Trading Limited	299,026	KG	2,752,534.33
2021	21HKVN03PC500-1	CHINA	Hong Kong Hailiang Metal Trading Limited	199,968	KG	1,840,705.44
2021	SINTH2103KGHM747	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	747,199	KG	6,724,791.00
2021	HKYN2104BHP302-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	302,514	KG	2,737,751.70
2021	VN2104SSCT420	CONGO	Hong Kong Hailiang Metal Trading Limited	420,805	KG	3,934,526.75
2021	VN2103SSCT565	CONGO	Hong Kong Hailiang Metal Trading Limited	564,355	KG	5,213,229.31
2021	VN2103SSCT210	CONGO	Hong Kong Hailiang Metal Trading Limited	209,760	KG	1,937,658.00
2021	VNSGPPOLAND500	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	504,529	KG	4,036,232.00
2021	VNHKZIJIN-500-	CHINA	Hong Kong Hailiang Metal Trading Limited	498,716.500	KG	4,388,705.20
2021	21HKVN04PC300	CHINA	Hong Kong Hailiang Metal Trading Limited	300,692	KG	2,809,966.74
2021	SINTH2104KGHM751	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	751,820	KG	6,954,335.00
2021	21HKVN04PC200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,003	KG	1,869,028.04
2021	HKYN2105RTM300-I	INDONESIA	Hong Kong Hailiang Metal Trading Limited	300,001	KG	3,090,010.30
2021	HKYN21WB03-300-1	CONGO	Hong Kong Hailiang Metal Trading Limited	296,660	KG	2,758,938.00
2021	VN2105JPSX299	CHINA	Hong Kong Hailiang Metal Trading Limited	299,710	KG	3,101,998.50
2021	VN2105JPSX200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,510	KG	2,085,304.00
2021	HKYN2106BHP200-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	200,480	KG	2,014,824.00
2021	HKYN2106BHP303	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	303,542	KG	3,050,597.10
2021	HKYN2106RTM500	INDONESIA	Hong Kong Hailiang Metal Trading Limited	499,992	KG	4,749,924.00
2021	HKVN2106KGHM746	POLAND	Hong Kong Hailiang Metal Trading Limited	746,368	KG	7,724,908.80
2021	HKYN2106BHP498	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	498,658	KG	4,637,519.40
2021	21HKVN07PC300	CHINA	Hong Kong Hailiang Metal Trading Limited	300,744	KG	2,932,254.00
2021	21HKYN07PPC300G	INDONESIA	Hong Kong Hailiang Metal Trading Limited	299,998	KG	3,061,479.59
2021	VN2106SSCT198	CONGO	Hong Kong Hailiang Metal Trading Limited	198,464	KG	2,004,486.40

2021	21HKVN07PC200	CHINA	Hong Kong Hailiang Metal Trading Limited	200,686	KG	1,956,688.50
2021	HKVN2107TRA500	CHINA	Hong Kong Hailiang Metal Trading Limited	496,218	KG	4,679,335.74
2021	VN2108SSCT240	CONGO	Hong Kong Hailiang Metal Trading Limited	240,065	KG	2,328,630.50
2021	VN2108SSCT264	CONGO	Hong Kong Hailiang Metal Trading Limited	264,052	KG	2,561,304.40
2021	HKYN2107BHP500-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	500,218	KG	4,777,081.90
2021	HKVN2108KGHM749-	POLAND	Hong Kong Hailiang Metal Trading Limited	751,175	KG	7,173,721.25
2021	21HKVN08PC500-1	CHINA	Hong Kong Hailiang Metal Trading Limited	500,000	KG	4,725,000.00
2021	HKVN2107KGHM749-	POLAND	Hong Kong Hailiang Metal Trading Limited	749,587	KG	7,533,349.35
2021	VN2108SSCT354	CONGO	Hong Kong Hailiang Metal Trading Limited	354,247	KG	3,471,620.60
2021	VN2108SSCT359	CONGO	Hong Kong Hailiang Metal Trading Limited	359,043	KG	3,518,621.40
2021	HKYN21CO07-500-1	CHILE	Hong Kong Hailiang Metal Trading Limited	499,930	KG	4,724,338.50
2021	21HKVN08PC20-J-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	19,010	KG	174,987.05
2021	HKVN2108KGHM749-	POLAND	Hong Kong Hailiang Metal Trading Limited	751,175	KG	7,173,721.25
2021	HKVN2107KGHM749-	POLAND	Hong Kong Hailiang Metal Trading Limited	749,587	KG	7,533,349.35
2021	HKYN2107BHP500-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	500,218	KG	4,777,081.90
2021	HKVN2107TRA500	CHINA	Hong Kong Hailiang Metal Trading Limited	496,218	KG	4,679,335.74
2021	21HKVN10PC500-1	CHINA	Hong Kong Hailiang Metal Trading Limited	501,926	KG	4,798,914.49
2021	21HKYN10PPC300G-	INDONESIA	Hong Kong Hailiang Metal Trading Limited	300,000	KG	2,853,600.00
2021	SGPYN21CO08-500-	CHILE	HAILIANG (SINGAPORE) PTE. LTD.	249,732	KG	2,363,963.11
2021	SGPYN21CO08-500-	CHILE	HAILIANG (SINGAPORE) PTE. LTD.	249,889	KG	2,365,449.27
2021	HKYN2110BHP200-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	200,244	KG	1,899,514.58
2021	HKYN2110RTM500-I	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,001	KG	4,676,009.35
2021	21HKVN09PC500-1	CHINA	Hong Kong Hailiang Metal Trading Limited	500,279	KG	4,654,095.54
2021	21HKVN09PCM40-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	39,843	KG	348,705.94
2021	SINTH2110KGHM751	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	751,792	KG	7,085,639.60
2021	HKYNV2110TRA411-	CONGO	Hong Kong Hailiang Metal Trading Limited	411,377	KG	3,961,560.51
2021	VN2110SSCT276	CONGO	Hong Kong Hailiang Metal Trading Limited	276,676	KG	2,645,022.56
2021	SINTH2109KGHM749	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	749,014	KG	7,261,690.73
2021	HKYN21CO09-500	CHILE	Hong Kong Hailiang Metal Trading Limited	499,902	KG	4,727,073.31
2021	HKVN2110TRA500	CHINA	Hong Kong Hailiang Metal Trading Limited	501,184	KG	4,811,366.40
2021	21HKVN10PCM80	JAPAN	Hong Kong Hailiang Metal Trading Limited	78,972	KG	760,184.47
2021	VN2110SSCT299	CONGO	Hong Kong Hailiang Metal Trading Limited	299,756	KG	2,898,340.76
2021	HKYN2111BHP299	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	299,854	KG	3,028,525.40
2021	SINTH2111KGHM750	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	750,766	KG	7,382,282.08
2021	VN2111SSCT292	CONGO	Hong Kong Hailiang Metal Trading Limited	292,893	KG	2,811,930.96
2021	HKYN2111RTM500	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,000	KG	4,763,500.00
2021	21HKVN11PC500	JAPAN	Hong Kong Hailiang Metal Trading Limited	300,487	KG	2,990,146.14
2021	21HKVN11PCM80	JAPAN	Hong Kong Hailiang Metal Trading Limited	79,348	KG	769,040.82
2021	SINTH2112KGHM250	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	257,228	KG	2,532,409.66
2021	SINTH2112KGHM500	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	493,286	KG	4,912,141.99
2021	21HKVN11PC500	JAPAN	Hong Kong Hailiang Metal Trading Limited	199,914	KG	1,984,346.36
2021	21HKYN11PPC300G	INDONESIA	Hong Kong Hailiang Metal Trading Limited	300,001	KG	3,047,410.16
2021	21HKVN12PC500	CHINA	Hong Kong Hailiang Metal Trading Limited	500,675	KG	4,835,519.15
2021	SGPYN21CO10-500	CHILE	HAILIANG (SINGAPORE) PTE. LTD.	249,997	KG	2,436,720.76
2021	SGPYN21CO10-500	CHILE	HAILIANG (SINGAPORE) PTE. LTD.	249,973	KG	2,436,486.83
2021	HKYN2112MIT298	CHINA	Hong Kong Hailiang Metal Trading Limited	298,423	KG	2,843,971.19
2021	HKVN2112SSCT189	CONGO	Hong Kong Hailiang Metal Trading Limited	189,015	KG	1,791,603.25
2021	21HKYN12PPC300G	INDONESIA	Hong Kong Hailiang Metal Trading Limited	299,977	KG	2,906,177.18
2021	21HKVN09PC500-1	CHINA	Hong Kong Hailiang Metal Trading Limited	500,279	KG	4,654,095.54
2021	34	CHILE	Hong Kong Hailiang Metal Trading Limited	499,930	KG	4,724,338.50
2021	HKYN2112RTM500	INDONESIA	Hong Kong Hailiang Metal Trading Limited	99,996	KG	959,761.61
2021	HKVN2111TRA500	CHINA	Hong Kong Hailiang Metal Trading Limited	496,752	KG	4,818,494.40

2021	HKYN21CO11-250-1	CHILE	Hong Kong Hailiang Metal Trading Limited	251,729	KG	2,392,684.15
2021	HKYN2112BHP209	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	209,522	KG	2,029,849.14
2021	HKYN2112MIT500	CHINA	Hong Kong Hailiang Metal Trading Limited	499,955	KG	4,764,571.15
2022	22HKVN02PCM40-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	40,020	KG	387,633.72
2022	HKYN22CO01-250-2	CHILE	Hong Kong Hailiang Metal Trading Limited	249,943	KG	2,462,688.38
2022	HKYN22TRA03-500A	CHINA	Hong Kong Hailiang Metal Trading Limited	501,855	KG	4,993,457.25
2022	HKYN22TRA02-499	CHINA	Hong Kong Hailiang Metal Trading Limited	499,087.700	KG	4,965,922.62
2022	VN2202SSCT217	CONGO	Hong Kong Hailiang Metal Trading Limited	217,890	KG	2,148,395.40
2022	HKGNK2202-499	PHILPIN	Hong Kong Hailiang Metal Trading Limited	499,331	KG	5,098,668.84
2022	HKGNK2202-497	PHILPIN	Hong Kong Hailiang Metal Trading Limited	497,821	KG	5,083,250.23
2022	HKYN22TRA03-500B	CHINA	Hong Kong Hailiang Metal Trading Limited	497,289	KG	4,948,025.55
2022	HKYN2203METAL203	INDONESIA	Hong Kong Hailiang Metal Trading Limited	203,514	KG	2,096,194.20
2022	HKYN2203BHP301-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	301,416	KG	3,104,584.80
2022	HKYN2203METAL303	INDONESIA	Hong Kong Hailiang Metal Trading Limited	202,910	KG	1,968,227.00
2022	HKYN2203METAL303	INDONESIA	Hong Kong Hailiang Metal Trading Limited	101,799	KG	987,450.30
2022	HKYN2203BHP299-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	299,234	KG	3,022,263.40
2022	HKYN22TRA01/2-51	CHINA	Hong Kong Hailiang Metal Trading Limited	514,915	KG	5,097,658.50
2022	HKYN2202KGHM506-	POLAND	Hong Kong Hailiang Metal Trading Limited	506,480	KG	4,988,828.00
2022	WAHL20220216-1	RUSSIAN	HAILIANG (SINGAPORE) PTE. LTD.	497,871	KG	4,943,859.03
2022	22HKVN03PCM60-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	58,051	KG	593,919.78
2022	HKYN2203MIT499-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	499,989	KG	5,049,888.90
2022	22HKVN03PCM30-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	29,088	KG	296,290.37
2022	HKYN2203IXM393-1	MEXICO	HAILIANG (SINGAPORE) PTE. LTD.	393,895	KG	4,017,729.00
2022	HKYN2203BHP301-1	CONGO	Hong Kong Hailiang Metal Trading Limited	313,256	KG	3,195,211.20
2022	HKYN2203BHP300-1	CONGO	Hong Kong Hailiang Metal Trading Limited	252,299	KG	2,573,449.80
2022	HKYN2203KGHM507-	POLAND	Hong Kong Hailiang Metal Trading Limited	507,499	KG	5,227,239.70
2022	HKYN2204METAL202	INDONESIA	Hong Kong Hailiang Metal Trading Limited	202,778	KG	2,048,057.80
2022	HKVN2203TRA617	CONGO	Hong Kong Hailiang Metal Trading Limited	616,918	KG	6,280,225.24
2022	HKVN2204TRA200	CONGO	Hong Kong Hailiang Metal Trading Limited	199,264	KG	2,072,345.60
2022	HKYN2204BHP400-1	CONGO	Hong Kong Hailiang Metal Trading Limited	171,513	KG	1,752,519.83
2022	VN2204SSCT293.62	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	293,620	KG	3,221,011.40
2022	HKYN22CO02-250-2	CHILE	Hong Kong Hailiang Metal Trading Limited	249,956	KG	2,525,305.47
2022	HKYN22CO03-500	CHILE	Hong Kong Hailiang Metal Trading Limited	499,109	KG	5,092,409.13
2022	HKYN22CO02-250-1	CHILE	Hong Kong Hailiang Metal Trading Limited	249,959	KG	2,525,335.78
2022	HKYN2204BHP302-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	302,318	KG	3,113,875.40
2022	22HKVN04PCM40-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	39,228	KG	401,341.67
2022	22SGPVN04PC300G	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	299,994	KG	3,117,837.64
2022	VN2204SSCT500.05	CHILE	HAILIANG (SINGAPORE) PTE. LTD.	500,057	KG	5,150,587.10
2022	HKVN2204KGHM505-	POLAND	Hong Kong Hailiang Metal Trading Limited	505,884	KG	5,134,722.60
2022	HKYN2204METAL304	INDONESIA	Hong Kong Hailiang Metal Trading Limited	162,514	KG	1,602,388.04
2022	HKYN2204METAL304	INDONESIA	Hong Kong Hailiang Metal Trading Limited	142,515	KG	1,405,197.90
2022	HKYN2204BHP304-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	304,382	KG	3,089,477.30
2022	VN2204SSCCT308	CONGO	Hong Kong Hailiang Metal Trading Limited	308,416	KG	3,222,947.20
2022	HKYN2205BHP396-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	396,182	KG	3,725,299.35
2022	HKVN2205TRA500	CHINA	Hong Kong Hailiang Metal Trading Limited	499,890.200	KG	4,748,956.90
2022	HKVN2204TRA500	CHINA	Hong Kong Hailiang Metal Trading Limited	499,319.200	KG	5,093,055.84
2022	HKYN22CO05-525-1	CHILE	Hong Kong Hailiang Metal Trading Limited	525,368	KG	5,069,801.20
2022	22HKVN05PC300-G	INDONESIA	Hong Kong Hailiang Metal Trading Limited	299,998	KG	2,822,381.18
2022	HKYN22CO03-499-1	CHILE	Hong Kong Hailiang Metal Trading Limited	499,997	KG	4,751,471.49
2022	22HKVN05PCM20-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	19,305	KG	197,644.59
2022	SPYN2205IXM500-1	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	499,374	KG	4,653,166.93
2022	HKYN2205METAL508	INDONESIA	Hong Kong Hailiang Metal Trading Limited	203,099	KG	1,892,882.68

2022	HKYN22CO05-500-1	CHILE	Hong Kong Hailiang Metal Trading Limited	499,876	KG	4,700,334.03
2022	22HKYN05MARU500G	INDONESIA	Hong Kong Hailiang Metal Trading Limited	499,982	KG	4,701,330.75
2022	HKVN2204TRA293	CONGO	Hong Kong Hailiang Metal Trading Limited	293,653	KG	2,995,260.60
2022	SPYN2205IXM300-1	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	300,000	KG	2,856,900.00
2022	22HKVN06PC200-G	INDONESIA	Hong Kong Hailiang Metal Trading Limited	200,000	KG	1,920,400.00
2022	HKVN2206TRA124	CONGO	Hong Kong Hailiang Metal Trading Limited	124,519	KG	1,214,060.25
2022	HKVN2206TRA500B	CHINA	Hong Kong Hailiang Metal Trading Limited	503,494	KG	4,682,494.20
2022	HKVN2206METAL202	INDONESIA	Hong Kong Hailiang Metal Trading Limited	202,607	KG	1,874,114.75
2022	HKVN2206TRA500A	CHINA	Hong Kong Hailiang Metal Trading Limited	502,520	KG	4,673,436.00
2022	HKVN2205KGHM502-	POLAND	Hong Kong Hailiang Metal Trading Limited	502,679	KG	4,735,236.18
2022	22HKVN06PCM20-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	19,004	KG	194,429.92
2022	HKVN2206TRA500D	CHINA	Hong Kong Hailiang Metal Trading Limited	496,486	KG	4,592,495.50
2022	HKYN2205METAL508	INDONESIA	Hong Kong Hailiang Metal Trading Limited	305,156	KG	2,844,053.92
2022	HKYN22CO06-500-1	CHILE	Hong Kong Hailiang Metal Trading Limited	499,689	KG	4,598,637.87
2022	HKVN2206TRA500C	CHINA	Hong Kong Hailiang Metal Trading Limited	499,312	KG	4,618,636.00
2022	HKVN2207TRA200A	CHINA	Hong Kong Hailiang Metal Trading Limited	199,394	KG	1,844,394.50
2022	HKVN2207TRA300A	CHINA	Hong Kong Hailiang Metal Trading Limited	299,978	KG	2,639,806.40
2022	22HKVN06PCM25-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	25,892	KG	273,833.79
2022	SPTH22IXM07-500-	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	500,001	KG	4,110,008.22
2022	HKVN2207TRA200B	CHINA	Hong Kong Hailiang Metal Trading Limited	198,468.500	KG	1,667,135.40
2022	22HKVN07PC600G-A	INDONESIA	Hong Kong Hailiang Metal Trading Limited	300,000	KG	2,365,800.00
2022	22HKVN07PC600G-B	INDONESIA	Hong Kong Hailiang Metal Trading Limited	299,999	KG	2,365,792.11
2022	HKYN22CO07-500-1	CHILE	Hong Kong Hailiang Metal Trading Limited	501,164	KG	3,910,582.69
2022	HKVN2207TRA300B	CHINA	Hong Kong Hailiang Metal Trading Limited	300,730	KG	2,255,475.00
2022	SPTH22IXM07-489-	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	489,971	KG	3,493,493.23
2022	HKYN2207METAL202	INDONESIA	Hong Kong Hailiang Metal Trading Limited	202,841	KG	1,523,335.91
2022	22HKVN07PCM20-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	19,379	KG	198,169.65
2022	HKYN2207BHP395-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	395,326	KG	2,808,000.58
2022	HKYN2207BHP201-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	201,142	KG	1,629,853.63
2022	SPTH22IXM07-502-	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	502,049	KG	3,609,732.31
2022	SPTH22IXM07-96-1	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	96,181	KG	721,357.50
2022	VN2207SSCT499	CONGO	Hong Kong Hailiang Metal Trading Limited	499,892	KG	3,749,190.00
2022	HKYN22CO08-500-1	CHILE	Hong Kong Hailiang Metal Trading Limited	499,816	KG	3,750,119.45
2022	22HKVN07PCM20A	JAPAN	Hong Kong Hailiang Metal Trading Limited	19,185	KG	189,298.40
2022	22HKYN08MARU500	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,029	KG	3,756,217.85
2022	HKYN2207IXM72	CONGO	Hong Kong Hailiang Metal Trading Limited	72,423	KG	542,448.27
2022	SPTH22IXM08-5000	INDONESIA	HAILIANG (SINGAPORE) PTE. LTD.	500,009	KG	3,765,067.77
2022	HKVN2207SSCT499	CONGO	Hong Kong Hailiang Metal Trading Limited	499,892	KG	3,749,190.00
2022	HKYN2208METAL203	INDONESIA	Hong Kong Hailiang Metal Trading Limited	203,092	KG	1,606,457.72
2022	SPTH22IXM07-502	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	452,848	KG	3,255,977.12
2022	HKVN2207KGHM497	POLAND	Hong Kong Hailiang Metal Trading Limited	455,512	KG	3,407,229.76
2022	HKYN2208IXM23-1	CONGO	Hong Kong Hailiang Metal Trading Limited	23,994	KG	182,234.43
2022	HKVN2208TRA449A	CHINA	Hong Kong Hailiang Metal Trading Limited	499,441.800	KG	3,895,646.04
2022	SPTH22IXM07-502	POLAND	Hong Kong Hailiang Metal Trading Limited	455,512	KG	3,407,229.76
2022	HKVN2208TRA224A	CONGO	Hong Kong Hailiang Metal Trading Limited	223,991	KG	1,769,528.90
2022	HKVN2208TRA248A	CONGO	Hong Kong Hailiang Metal Trading Limited	248,656	KG	1,964,382.40
2022	HKYN2208IXM24-1	CONGO	Hong Kong Hailiang Metal Trading Limited	24,076	KG	182,857.22
2022	HKYN2208BHP399-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	399,270	KG	3,035,649.81
2022	HKYN2209IXM500-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,002	KG	3,925,015.70
2022	22HKVN08PC400G1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	399,999	KG	3,261,991.85
2022	HKYN2209IXM50000	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,003	KG	3,925,023.55
2022	22HKVN08PCM40-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	39,792	KG	406,912.99

2022	22HKVN08PCM160-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	159,971	KG	1,538,925.82
2022	SGPYN22CO09-500-	CHILE	HAILIANG (SINGAPORE) PTE. LTD.	499,975	KG	4,001,299.93
2022	HKYN2209METAL202	INDONESIA	Hong Kong Hailiang Metal Trading Limited	202,614	KG	1,703,983.74
2022	SINTH2209KGHM502	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	502,883	KG	4,231,760.45
2022	HKVN2207KGHM497-	POLAND	Hong Kong Hailiang Metal Trading Limited	52,789	KG	394,861.72
2022	HKVN2209TRA300A	CHINA	Hong Kong Hailiang Metal Trading Limited	299,414.100	KG	2,545,019.85
2022	SPVN22IXM09-301-	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	301,612	KG	2,560,685.88
2022	VN2209SSCT372	CONGO	Hong Kong Hailiang Metal Trading Limited	372,253	KG	3,071,087.25
2022	HKVN2209TRA400A	CHINA	Hong Kong Hailiang Metal Trading Limited	399,020.200	KG	3,311,867.66
2022	HKYN2210METAL202	INDONESIA	Hong Kong Hailiang Metal Trading Limited	202,913	KG	1,623,304.00
2022	22HKVN09PCM40J-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	38,192	KG	390,513.20
2022	HKYN2210BHP393-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	393,696	KG	3,308,227.49
2022	SINVN2210KGHM498	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	498,623	KG	4,248,267.96
2022	22HKVN10PC400-G	INDONESIA	Hong Kong Hailiang Metal Trading Limited	399,996	KG	3,391,966.08
2022	22HKVN10PC180-G	INDONESIA	Hong Kong Hailiang Metal Trading Limited	180,004	KG	1,530,934.02
2022	22HKVN10PCM20-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	19,101	KG	195,307.73
2022	HKYN2210KPM493-1	POLAND	Hong Kong Hailiang Metal Trading Limited	493,631	KG	4,171,181.95
2022	HKVN2210TRA500A	CHINA	Hong Kong Hailiang Metal Trading Limited	498,880.200	KG	4,240,481.70
2022	HKVN2209TRA275A	CONGO	Hong Kong Hailiang Metal Trading Limited	275,527	KG	2,286,874.10
2022	SPTH22IXM11-394-	RUSSIAN	HAILIANG (SINGAPORE) PTE. LTD.	394,838	KG	3,336,381.10
2022	HKVN2210TRA800B	CHINA	Hong Kong Hailiang Metal Trading Limited	399,782	KG	3,358,168.80
2022	22HKVN10PPC500-2	JAPAN	Hong Kong Hailiang Metal Trading Limited	200,068	KG	1,681,771.61
2022	22HKVN300PC300-G	INDONESIA	Hong Kong Hailiang Metal Trading Limited	299,999	KG	2,492,391.69
2022	22HKVN10PPC500-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	297,929	KG	2,504,391.17
2022	HKYN22CO10-500-1	CHILE	Hong Kong Hailiang Metal Trading Limited	500,435	KG	4,255,198.81
2022	HKYN22CO11-500-1	CHINA	Hong Kong Hailiang Metal Trading Limited	500,366	KG	4,304,648.70
2022	SPVN22IXM11-592-	RUSSIAN	HAILIANG (SINGAPORE) PTE. LTD.	592,189	KG	5,039,528.39
2022	SPVN22IXM11-291-	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	291,523	KG	2,483,775.96
2022	SPVN22IXM11-245-	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	245,253	KG	2,089,555.56
2022	MGLYN03	CHINA	Hong Kong Hailiang Metal Trading Limited	174,833	KG	1,452,862.23
2022	22HKVN10PCM100-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	99,667	KG	881,581.53
2022	MGLYN02	JAPAN	Hong Kong Hailiang Metal Trading Limited	49,143	KG	408,378.33
2022	SPTH22IXM11-197-	RUSSIAN	HAILIANG (SINGAPORE) PTE. LTD.	197,406	KG	1,668,080.70
2022	HKVN2210TRA800A	CHINA	Hong Kong Hailiang Metal Trading Limited	399,892	KG	3,359,092.80
2022	HKYN2211BHP199-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	199,518	KG	1,696,501.56
2022	SGVN2211TRA515	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	515,061	KG	4,481,030.70
2022	HKYN2211BHP204	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	204,540	KG	1,759,657.62
2022	HKYN2211METAL202	INDONESIA	Hong Kong Hailiang Metal Trading Limited	202,380	KG	1,720,230.00
2022	SPTH22IXM11-442	ZAMBIA	HAILIANG (SINGAPORE) PTE. LTD.	442,113	KG	3,784,487.28
2022	SPVN22IXM11-107	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	107,600	KG	921,056.00
2022	HKVN2211TRA500	CHINA	Hong Kong Hailiang Metal Trading Limited	500,113.700	KG	4,250,966.45
2022	SPVN22IXM11-652-	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	652,138	KG	5,575,779.90
2022	22HKVN11PCM100-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	99,683	KG	877,193.45
2022	22HKVN11PCM40-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	39,142	KG	400,226.95
2022	HKYN2212WH500-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	500,006	KG	4,255,051.06
2022	HKYN2212WH1000-2	INDONESIA	Hong Kong Hailiang Metal Trading Limited	600,004	KG	5,166,034.44
2022	HKYN2212BHP417-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	417,584	KG	3,634,233.55
2022	HKYN2212BHP201-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	201,930	KG	1,757,396.79
2022	SGVN2212TRA984A	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	207,222	KG	1,782,109.20
2022	HKVN2211TRA250A	CHINA	Hong Kong Hailiang Metal Trading Limited	249,799.900	KG	2,123,299.15
2022	HKYN2212BHP174-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	174,442	KG	1,518,168.73
2022	HKYN2212BHP204-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	204,048	KG	1,775,829.74

2022	HKYN2212CRL119-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	119,824	KG	1,044,865.28
2022	22HKVN11PC500A	JAPAN	Hong Kong Hailiang Metal Trading Limited	196,530	KG	1,687,406.58
2022	MGLYN01A	CHILE	Hong Kong Hailiang Metal Trading Limited	100,510	KG	835,238.10
2022	22HKVN11PC500B	JAPAN	Hong Kong Hailiang Metal Trading Limited	296,523	KG	2,545,946.48
2022	SGVN2212TRA516A	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	516,318	KG	4,440,334.80
2022	SGVN2212TRA500A	CHINA	HAILIANG (SINGAPORE) PTE. LTD.	499,157	KG	4,342,665.90
2022	SGVN2212TRA984C	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	207,517	KG	1,784,646.20
2022	SGVN2212TRA984B	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	310,896	KG	2,673,705.60
2022	HKYN2212WH400-1	INDONESIA	Hong Kong Hailiang Metal Trading Limited	399,996	KG	3,291,967.08
2022	MGLYN01B	CHILE	Hong Kong Hailiang Metal Trading Limited	99,927	KG	830,393.37
2022	HKYN2212KPM492-1	POLAND	Hong Kong Hailiang Metal Trading Limited	492,954	KG	4,246,798.71
2022	HKYN2212METAL202	INDONESIA	Hong Kong Hailiang Metal Trading Limited	202,429	KG	1,740,889.40
2022	GLD322	CONGO	Hong Kong Hailiang Metal Trading Limited	322,619	KG	2,772,910.31
2022	GLD93	CONGO	Hong Kong Hailiang Metal Trading Limited	93,481	KG	803,469.20
2022	HKYN22CO12-499-1	CHINA	Hong Kong Hailiang Metal Trading Limited	499,275	KG	4,295,262.83
2022	SGVN2212TRA984D	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	258,937	KG	2,226,858.20
2022	VN2212SSCT219	CONGO	Hong Kong Hailiang Metal Trading Limited	219,985	KG	1,913,869.50
2022	HKYN2212BHP396-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	396,214	KG	3,408,629.04
2022	SINVN2211KGHM491	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	491,103	KG	4,272,105.00
2022	22HKVN01PCM40-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	38,201	KG	368,563.25
2022	22HKVN01PCM80-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	78,339	KG	757,929.83
2022	SINTH2112KGHM749	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	249,964	KG	2,455,396.37
2022	21HKVN12PCM40-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	38,133	KG	360,280.58
2022	HKYN2112BHP299-1	AUSTRALIA	Hong Kong Hailiang Metal Trading Limited	299,706	KG	2,862,192.30
2022	VN2112SSCT508	CONGO	HAILIANG (SINGAPORE) PTE. LTD.	508,846	KG	5,032,044.24
2022	21HKYN12PPC500-2	JAPAN	Hong Kong Hailiang Metal Trading Limited	197,727	KG	1,850,526.99
2022	21HKYN12PPC500-1	JAPAN	Hong Kong Hailiang Metal Trading Limited	294,263	KG	2,754,007.42
2022	VN2201SSCT316	CONGO	Hong Kong Hailiang Metal Trading Limited	316,540	KG	3,027,705.10
2022	SINTH2112KGHM749	POLAND	HAILIANG (SINGAPORE) PTE. LTD.	500,456	KG	4,915,979.29
2022	HKYN2112METAL203	INDONESIA	Hong Kong Hailiang Metal Trading Limited	203,334	KG	1,942,856.37
2022	HKYN21CO11-250-2	CHILE	Hong Kong Hailiang Metal Trading Limited	249,903	KG	2,411,813.85
2022	HKYN2111RTM500-I	INDONESIA	Hong Kong Hailiang Metal Trading Limited	400,003	KG	3,839,228.79
2022	VN2108SSCT359	CONGO	Hong Kong Hailiang Metal Trading Limited	359,043	KG	3,518,621.40
2022	SGPYN21CO08-500-	CHILE	HAILIANG (SINGAPORE) PTE. LTD.	249,732	KG	2,363,963.11
2022	HKYN2201METAL202	INDONESIA	Hong Kong Hailiang Metal Trading Limited	202,831	KG	1,967,460.70
2022	HKYN21CO12-500-2	CHILE	Hong Kong Hailiang Metal Trading Limited	250,683	KG	2,457,445.45
2022	HKVN2201TRA205	CONGO	Hong Kong Hailiang Metal Trading Limited	205,108	KG	2,010,058.40
2022	HKYN21CO12-500-1	CHILE	Hong Kong Hailiang Metal Trading Limited	252,739	KG	2,477,600.42
2022	22HKVN02PCM60-J	JAPAN	Hong Kong Hailiang Metal Trading Limited	59,747	KG	572,854.24
2022	HKYN2201KGHM750-	POLAND	Hong Kong Hailiang Metal Trading Limited	248,073	KG	2,395,144.82
2022	HKYN2201KGHM750-	POLAND	Hong Kong Hailiang Metal Trading Limited	490,349	KG	4,734,319.60
2022	HKGNK2202-20-1	CONGO	Hong Kong Hailiang Metal Trading Limited	20,103	KG	201,090.31
2022	HKYN22TRA01-500	CHINA	Hong Kong Hailiang Metal Trading Limited	488,582	KG	4,827,190.16
2022	HKYN21CO01-250-1	CHILE	Hong Kong Hailiang Metal Trading Limited	249,957	KG	2,462,826.32

- e) Sample Form I
- f) Audited financial statements for the Period 2018-2022.

4.7 A letter dated 12.09.2023 [RUD5] was written to Lumiere Law Partners for submitting the following data:

- a) Copies of Original Invoices & Bills of Lading with respect to procurement of Consumables other than Copper Cathodes and Ingots used in manufacturing of Copper Tubes made by M/s. Jintian Copper Industrial (Vietnam) Company Limited from ASEAN & Non-ASEAN Countries.
- b) Sales & Purchase Ledgers of M/s. Jintian Copper Industrial (Vietnam) Company Limited and its Subsidiary Companies such as Jintian (Singapore) International Industry Pte. Ltd., Hongkong Maytime International Industry Limited and Ningbo Jintian Import & Export Co. Ltd. for the period 2020-2023.

4.8 Vide reply letter dated 25.10.2023 [RUD7], M/s. Lumiere Law Partners submitted the following documents:

- a) Invoices and Bill of Ladings of Import of other raw material i.e. Phosphor Copper procured by JinTian Vietnam along with excel summary thereof. Invoices and Bill of Ladings of Import of Consumables procured by JinTian Vietnam along with excel summary thereof.
- b) Purchase Ledger of Copper Cathode and Phosphor Copper procured by JinTian Vietnam.
- c) Sales Ledger of Copper Tubes & Pipes by JinTian Vietnam to India.
- d) Purchase & Sales Ledger of Copper Cathode and Phosphor Copper of following subsidiaries/related companies of JinTian Vietnam:
 - i. Jintian (Singapore) International Industry Pte. Ltd.
 - ii. Ningbo Jintian Copper (Group) Co., Ltd
 - iii. Hongkong Maytime International Industry Limited
 - iv. Ningbo Jintian Import & Export Co. Ltd.

4.9 A letter dated 10.11.2023 [RUD8] was written to Lumiere Law Partners in connection with letter dated 22-09-2023 vide which they submitted Annexure-4 wherein Cost Break-up Sheet of the Supplier M/s. Hailiang Copper Manufacturing Co. Ltd. in r/o Exports to India for the period 2018-2022 was provided. Hence, it was asked to submit following data:

- a) Cost Break-up Sheet in r/o the Total Production of the Company for the period 2018-2023.
- b) Copies of Original Invoices & Bills of Lading with respect to procurement of Consumables other than Copper Cathodes and Ingots used in manufacturing of Copper Tubes made by M/s. Hailiang Copper Manufacturing Co. Ltd. from ASEAN & Non-ASEAN Countries.
- c) Sales & Purchase Ledgers of M/s. Hailiang Copper Manufacturing Co. Ltd. and its subsidiary companies for the period 2018-2023.

4.10 Vide reply letter dated 04.12.2023 [RUD9] & email dated 31.01.2024 [RUD12], M/s. Lumiere Law Partners submitted the following details:

- a) Cost Break-up Sheet of M/s. Hailiang Vietnam for the period of 2018-2023 along with RVC analysis.

S.No.	Particulars	UOM	2018	2019	2020	2021	2022
A	Copper Cathode Originated from ASEAN Countries (HSN - 74031100)	VND (Lakhs)	17,773,485	20,988,511	15,064,952	22,160,720	27,734,265
B	Copper Cathode Originated from Non-ASEAN Countries (HSN - 74031100)	VND (Lakhs)	11,698,068	12,117,963	9,300,503	14,920,299	39,085,302
C	Other Raw Material Cost Originated from Non-ASEAN Countries	VND (Lakhs)	68,531	118,954	129,936	103,960	148,941
D	Utility Cost	VND (Lakhs)	330,960	309,486	287,239	338,902	561,272
E	Direct Wages & Salaries	VND (Lakhs)	178,495	217,642	193,379	222,898	340,348
F	Direct Overhead Cost	VND (Lakhs)	944,273	1,084,735	940,772	933,384	1,538,667
G	Other Cost	VND (Lakhs)	179,638	194,189	139,382	221,226	346,923
H	Total Cost	VND (Lakhs)	31,173,450	35,031,480	26,056,163	38,901,388	69,755,717
I	Profit	VND (Lakhs)	2,156,326	2,335,457	2,162,386	294,686	4,954,774
J	FOB Sales Value of Copper Pipes (HSN - 74111000)	VND (Lakhs)	33,329,775	37,366,937	28,218,549	38,606,701	74,710,491
RVC Analysis							
K	RVC (A+D+E+F+G+I "OR" J-B-C)	VND (Lakhs)	21,563,176	25,130,019	18,788,111	23,582,443	35,476,248
L	RVC (K / J)	%	65%	67%	67%	61%	47%

Name of the Product		Copper Tubes & Pipes				Copper Tubes & Pipes			
HSN		74111000				74111000			
Quantity of Finished Goods Produced (MT)		55,794				65,193			
Total Sales (MT)		56,172				64,764			
Export to India (MT)		19,189				23,289			
S.N o.	Particulars	1 January 2018 to 31 December 2018				1 January 2019 to 31 December 2019			
		Total		Exports to India		Total		Exports to India	
		Qty (MT)	Value (VND)	Qty (MT)	Value (VND)	Qty (MT)	Value (VND)	Qty (MT)	Value (VND)
1	Copper Cathode	55,742	8,547,709,078,476	19,172	2,947,155,370,978	65,133	9,364,174,616,930	23,267	3,310,647,446,781
	Originated from ASEAN Countries			11,496	1,777,348,530,830			14,733	2,098,851,099,701
	Originated from Non-ASEAN Countries			7,676	1,169,806,840,149			8,535	1,211,796,347,080
2	Other Raw Materials - Originated from Non-ASEAN Countries		19,925,493,708		6,853,122,775		33,299,545,358		11,895,380,532
3	Utility Cost		96,782,952,706		33,095,955,595		86,689,662,526		30,948,616,492
4	Direct Wages & Salaries		52,197,425,887		17,849,462,545		60,963,298,829		21,764,183,878
6	Direct Overhead Cost		276,135,073,647		94,427,312,663		303,843,263,042		108,473,471,319
7	Other Cost		52,531,689,796		17,963,767,628		54,393,859,026		19,418,863,028
8	Total Cost of Sales		9,045,281,714,220		3,117,344,992,184		9,903,364,245,711		3,503,147,962,030
9	FOB Value		9,746,671,526,511		3,332,977,544,277		10,466,791,393,440		3,736,693,664,515
10	Profit (10-9)		701,389,812,291		215,632,552,093		563,427,147,729		233,545,702,485

Copper Tubes & Pipes				Copper Tubes & Pipes				Copper Tubes & Pipes			
74111000				74111000				74111000			
68,385				43,254				57,601			
67,438				41,067				54,365			
17,584				18,143				31,935			
1 January 2020 to 31 December 2020				1 January 2021 to 31 December 2021				1 January 2022 to 31 December 2022			
Total		Exports to India		Total		Exports to India		Total		Exports to India	
Qty (MT)	Value (VND)	Qty (MT)	Value (VND)	Qty (MT)	Value (VND)	Qty (MT)	Value (VND)	Qty (MT)	Value (VND)	Qty (MT)	Value (VND)
68,322	9,594,196,772,270	17,568	2,436,545,514,900	43,214	8,463,197,091,260	18,126	3,708,101,875,091	57,548	12,206,984,059,124	31,906	6,681,956,640,796
		10,893	1,506,495,240,840			10,920	2,216,071,993,146			13,507	2,773,426,468,394
		6,675	930,050,274,060			7,206	1,492,029,881,945			18,399	3,908,530,172,402
	50,531,719,275		12,993,595,862		24,784,907,436		10,395,955,446		26,864,383,770		14,894,120,732
	109,771,181,492		28,723,947,089		80,289,522,834		33,890,187,550		103,060,922,960		56,127,187,479
	73,901,589,228		19,337,911,007		52,806,864,333		22,289,764,256		62,494,751,222		34,034,768,150

	359,524,576,282		94,077,195,544		221,128,865,518		93,338,438,947		282,530,562,376		153,866,716,769
	53,266,046,352		13,938,185,563		52,410,725,681		22,122,554,230		63,702,092,220		34,692,288,504
	10,241,191,884,899		2,605,616,349,964		8,894,617,977,062		3,890,138,775,520		12,745,636,771,672		6,975,571,722,430
	10,783,975,761,387		2,821,854,925,571		9,146,345,436,210		3,860,670,125,934		13,718,364,545,720		7,471,049,129,488
	542,783,876,488		216,238,575,607		251,727,459,148		- 29,468,649,586		972,727,774,048		495,477,407,058

- b) Copies of Original Invoices and Bills of Lading of Hailiang Vietnam of Copper Cathodes and Ingots (2018-2023).
- c) Original Invoices & Bills of Lading with respect to procurement of Consumables other than Copper Cathodes and Ingots used in manufacturing of Copper Tubes by Hailiang Vietnam (2020-2023).
- d) Sales & Purchase Ledgers of M/s. Hailiang Copper Manufacturing Co. Ltd. and its subsidiary companies.

4.11 A letter dated 11.12.2023 was written to M/s. Lumiere Law Partners regarding above data submitted by them in respect of M/s. Jintian Copper Industrial (Vietnam) Company & M/s. Hailiang (Vietnam) Copper Manufacturing Co. Ltd. Wherein, it was requested to provide a cost sheet for their total production as mentioned in the balance sheets in the following format for both the above Vietnamese Suppliers on their respective letter heads and duly authenticated by M/s. Lumiere Law Partners being their authorized representative. However, M/s. Lumiere Law Partners vide their letter dated 19.12.2023 informed that they have withdrawn as legal representative of M/s.JinTian Copper Industrial Vietnam Company Ltd. in the subject matter and any further communication in the matter may directly be made to the supplier.

S. No.	Particulars	2018	2019	2020	2021	2022
A	Total Raw Material Cost					
B	Copper Cathode Originated from ASEAN Countries					
C	Copper Cathode Originated from Non- ASEAN Countries					
D	Other Raw materials cost originated from Non- ASEAN Countries					
E	FOB Sales Value of Copper Pipes					
F	Non-AIFTA Content Percentage (after applying Indirect Method formula given in the FTA Notification No. 189/2009 dated 31.12.2019)					

4.12 M/s. Lumiere Law Partners vide their letter dated 28.12.2023 **[RUD10]** submitted the following:

- A. We invite reference to your letter dated 11th December 2023 whereby you have requested cost break up sheet in r/o the total production of Hailiang (Vietnam) Copper Manufacturing Co. Ltd ("Hailiang Vietnam") on their letterhead as per the specified format.
- B. In this regard, Hailiang Vietnam is providing **the cost break up sheet in r/o the total production** as follows and as already submitted before the Authority:

S.No.	Particulars	VND Billion
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		2018	2019	2020	2021	2022	2023 H1
A	Total Raw Material Cost	8,568	9,397	9,645	8,488	12,234	7,181
B	Copper Cathode Originated from ASEAN Countries	8,548	9,364	9,594	8,463	12,207	7,165
C	Copper Cathode Originated from Non-ASEAN Countries						
D	Other Raw Material Cost Originated from Non- ASEAN Countries	20	33	51	25	27	16
E	FOB Sales Value of Copper Pipes	9,747	10,467	10,784	9,146	13,718	7,756

Note that the above cost break up sheet provided by Hailiang Vietnam in r/o the total production does not show the following as requested by the Authority:

- a. Consumption of copper cathode originating in ASEAN and copper cathode originating in Non-ASEAN separately.
- b. Non-AIFTA content percentage in total production of copper pipes and tubes after applying Indirect Method formula given in the Customs Notification No. 189/2009 dated 31.12.2019.

C. In this regard, Hailiang is providing and has already provided following cost break up sheet in r/o copper pipes and tubes exported to India showing (i) copper cathode originating in ASEAN and copper cathode originating in Non-ASEAN separately &(ii) Non-AIFTA content percentage of copper pipes and tubes exported to India.

S. No.	Particulars	VND Billion					
		2018	2019	2020	2021	2022	2023 H1
A	Total Raw Material Cost	2,954	3,323	2,450	3,718	6,697	3,848
B	Copper Cathode Originated from ASEAN Countries	1,777	2,099	1,506	2,216	2,773	1,503
C	Copper Cathode Originated from Non-ASEAN Countries	1,170	1,212	930	1,492	3,909	2,336
D	Other Raw Material Cost Originated from Non- ASEAN Countries	7	12	13	10	15	9
E	FOB Sales Value of Copper Pipes	3,333	3,737	2,822	3,861	7,471	4,123
F	Non-AIFTA Content Percentage (after applying Indirect Method formula given in the FTA Notification No. 189/2009 dated 31.12.2019	35%	33%	33%	39%	53%	57%

D. It can be seen that Non-AIFTA content in copper pipes and tubes exported to India is less than 65% after applying Indirect Method formula given in the Customs Notification No. 189/2009 dated 31.12.2019.

E. Haliang Vietnam notes that under India-ASEAN Free Trade Agreement, Indian Customs Authority is not required to examine records regarding copper cathode originating in ASEAN and copper cathode originating in Non-ASEAN in r/o total production of copper pipes and tubes by Hailiang Vietnam. Moreover, identification of consumption of copper cathode originating in ASEAN and copper cathode originating in Non-ASEAN separately in r/o total production of copper pipes and tubes is irrelevant in the present investigation. For the Indian Customs Authority, the relevant requirement is only with respect to copper pipes and tubes exported to India because 'Non-AIFTA content' percentage is relevant only for copper pipes and tubes exported to India.

F. Section 28DA of the Indian Customs Act, 1962 provides as follows:

"28DA. (1) **An importer making claim for preferential rate of duty, in terms of any trade agreement, shall, —**

i) make a declaration that goods qualify as originating goods for preferential rate of duty under such agreement,

ii) possess sufficient information as regards the manner in which country of origin criteria, including the regional value content and product specific criteria, specified in the rules of origin in the trade agreement, are satisfied;

iii) furnish such information in such manner as may be provided by rules;

iv) exercise reasonable care as to the accuracy and truthfulness of the information furnished."

G. Annex 2 of India-ASEAN Free Trade Agreement provides for Rules of Origin applicable for India and ASEAN countries. Rule 2 of Annex 2 of India-ASEAN Free Trade Agreement provides as follows:

"RULE 2 Origin Criteria

For the purposes of this Annex, **products imported by a Party** which are consigned directly within the meaning of Rule 8 **shall be deemed to be originating and eligible for preferential tariff treatment if they conform to the origin requirements** under any one of the following:

(b) Products not wholly produced or obtained in the exporting Party provided that the said products are eligible under Rule 4 or 5 or 6"

H. Thus, it is clear that product imported into India i.e. copper pipes and tubes exported by Hailiang Vietnam to India should fulfil origin requirement under Rule 4 of India-ASEAN Free Trade Agreement. Rule 4 specifically provides for 35% AIFTA content requirement for goods imported in India from ASEAN countries:

"RULE 4

Not Wholly Produced or Obtained Products

(a) For the purposes of Rule 2(b), a product shall be deemed to be originating if

(i) the AIFTA content is not less than 35 per cent of the FOB value; and"

I. Thus, Hailiang Vietnam maintains and has provided information regarding AIFTA content in copper pipes and tubes exported to India in full compliance with provisions under India-ASEAN Free Trade Agreement. **There is no concept of determining 'Non-AIFTA content' in total production of copper pipes and tubes under India-ASEAN Free Trade Agreement, Section 28DA of Indian Customs Act, 1962 and the rules framed thereunder.**

J. *In sum, India-ASEAN Free Trade Agreement (and the corresponding Section of Indian Customs Act, 1962 and Rules framed thereunder) expressly requires that AIFTA content of goods imported into India is required to be examined to determine whether the goods imported into India are eligible for preferential rate of duty or not.*

K. *Moreover, the Indirect method formula given in India ASEAN Free Trade Agreement and in the Notification No. 189/2009 dated 31.12.2019 is as follows:*

$$\frac{\text{Value of Imported Non AIFTA Materials, Parts or Produce} + \text{Value of Undetermined Origin Materials, Parts or Produce}}{\text{FOB Price}} \times 100 \leq 65$$

L. *It can be seen that numerator is Non-AIFTA content and denominator is FOB price i.e. price of goods at the frontier of the exporting country in the prescribed indirect method formula. It is not possible to calculate Non-AIFTA content for total production of any product because there is no 'FOB price' of such total production. In fact, there is always volume of total production and/or cost of production but there is no 'price' of total production per se. In other words, even if AIFTA content and Non-AIFTA content in total production of copper pipes and tubes is shown separately, there is no possibility of calculating Non-AIFTA content % in total production using indirect method (as well as direct method) as directed by the Authority because of unavailability of FOB price of such total production in that year.*

4. As per Customs Notification No. 189/2009 (NT) dated 31.12.2009, Customs Tariff [Determination of Origin of Goods under the Preferential Trade Agreement between ASEAN and India: -

3. Origin criteria- *The products imported by a party which are consigned directly under rule 8, shall be deemed*

to be originating and eligible for preferential tariff treatment if they conform to the origin requirements under any one of the following:-

(a) products which are wholly obtained or produced in the exporting party as specified in rule 4; or,

(b) products not wholly produced or obtained in the exporting party provided that the said products are eligible under rule 5 or 6.

5. Not wholly produced or obtained products- *(1) For the purpose of clause (b) of rule 3, a product shall be deemed to be originating, if –*

(i) the AIFTA content is not less than 35 per cent. of the FOB value; and

(ii) the non-originating materials have undergone at least a change in tariff sub-heading (CTSH) level i.e. at six digit of the Harmonized System:

Provided that the final process of the manufacture is performed within the territory of the exporting party.

(2) For the purpose of clause (i) of sub-rule (1), the formula for calculating the 35 per cent. AIFTA content is as follows:

(i) Direct Method

$$\frac{\text{AIFTA Material Cost} + \text{Direct Labour Cost} + \text{Direct Overhead Cost} + \text{Other Cost} + \text{Profit}}{\text{FOB Price}} \times 100 = 35\%$$

$$\frac{\text{AIFTA Material Cost} + \text{Direct Labour Cost} + \text{Direct Overhead Cost} + \text{Other Cost} + \text{Profit}}{\text{FOB Price}} \times 100 \geq 35\%$$

(ii) Indirect Method

$$\frac{\text{Value of Imported Non AIFTA Materials, Parts \vee Produce} + \text{Value of Undetermined Origin Materials, Parts \vee Produce}}{\text{FOB Price}}$$

$$\frac{\text{Value of Imported Non-AIFTA Materials, Parts or Produce} + \text{Value of Undetermined Origin Materials, Parts or Produce}}{\text{FOB Price}} \times 100 \leq 65\%$$

4.13 In view of the above position, a letter dated 29.12.2023 **[RUD11]** was again sent to Shri Gagandeep Singh/Shri Sahil Dudeja (M/s. JinTian Copper Industrial Vietnam Company Ltd).As no reply was received, reminder letter dated 23.01.2024 were issued to Shri Gagandeep Singh/Shri Sahil Dudeja. An email dated 18.03.2024 was received from Shri Gagandeep Singh stating that they are in the process of securing new legal representation. Once contract is finalized, they will instruct their new legal counsel to submit all necessary documents to customs. Again, a reminder letter dated 18.03.2024 was issued to them as no documents were received in this office. An email dated 21.03.2024 was received from M/s. Surana Law Offices stating that their Firm has recently been retained by M/s Jintian Copper Industrial (Vietnam) Company to pursue the legal issue relating to the Customs Duty Matter [AIFTA benefit under CAROTAR Rules, 2020].They will submit a detailed Reply with reference to letter dt. 18.03.2024 by Monday 25th March 2024 via e-mail followed by in-person service on a working day. Company Authorization etc. will also be annexed with the reply. Subsequently, they sent an email dated 27.05.2024 regarding Short Reply and Submission of requested Data of cost sheet for total production of M/s Jintian Copper Industrial (Vietnam) Company Ltd. as mentioned in the balance sheets as per the required format under Section 28DA of Customs Act, 1962 to claim AIFTA benefit under CAROTAR Rules, 2020-Reg. They also enclosed the authorization letter in favour of M/s. Surana Law Offices issued by M/s Jintian Copper Industrial (Vietnam) Company to represent the case on their behalf, wherein the following has been stated:

4.14 **Client's Submissions:**

6. That during the oral discussions with the representatives of our 'Client', it has come up that the Department is now trying to calculate the 35% value addition on the overall production of the company in Vietnam whereas our 'Client' as well as other Importers are stressing that the correct way and which is being followed till now is that the 35% value addition should be calculated on the overall India Imports only.
7. That our 'Client' assures that they are and in future also will fully comply with the laws and rules & regulations of the land. Our 'Client' is in no way taking undue advantage of any relaxation and is doing business in all genuineness and fairness.
8. That with utmost sincerity, our 'Client' requests that the issue be finally decided at your end so that the action as well as the reasoning is understood by them and all players in the field. If the same can be resolved by discussions, our client's representatives will seek appointment of your good office. Our 'Client' will adhere with all rules & regulations and laws applicable in the instant matter. The interim arrangement of furnishing 'BG' is creating great inconvenience not only to our 'Client' but to all the parties involved in the transaction. This is the peak market season for the use of copper tubes & pipes in India. On every consignment, to furnish separate 'BG' is becoming quite impossible. Our 'Client' wishes to certainly understand any gap in their understanding and at the same time doesn't want any loss of revenue to the Government's exchequer if they are told of any non-compliance.
9. That the additional data as requested to be furnished vide letter dt. 18.03.2024 is annexed with this Reply as '**Annexure-B' [Data for India Shipment], 'Annexure-C' [Data for All Company Shipment] & 'Annexure-D' [Calculation Data of Cathode]**.

Disruption of Business:

10. That the current suspension of preferential rate of Customs Duty has resulted in significant challenges for all importers of Copper Tubes & Pipes from Vietnam. It has caused noticeable disruptions and uncertainty in the supply chain and production lines as the submission of 'Bank Guarantee' on each import is making the industry suffer like anything and is causing irreparable loss. It is pertinent to note that the impact of the disruption, however little will certainly be an impediment in India's growth journey towards becoming 5 trillion economy soon and Government's goal of 'Viksit Bharat'.

Concluding Prayer:

11. That it is humbly submitted that in absence of any suspicion regarding authenticity of the documents itself, the information provided in the 'Certificate of Origin issued by the exporting country should be considered correct and should be granted primacy. The balance of convenience, pending the final conclusion of the verification/investigation proceeding is in the favour of the 'Client' who has acted in a legally compliant and bona fide manner. **The demand of furnishing 'Bank Guarantee' should be dispensed with at the earliest pending the final decision in the matter to save the industry.**

ANNEXURE A (FOR INDIA SHIPMENT)							
No.	Particulars -----VND	2018	2019	2020	2021	2022	2023 TILL May 31
A	Total Raw Material Cost	99,00,81,29,341	15,74,71,54,42,033	17,52,90,91,77,063	24,31,80,90,81,456	53,68,63,87,40,567	24,10,27,15,03,246
B	Copper Cathode Originated ASEAN Countries	11,56,56,50,312	6,95,26,59,86,504	6,81,82,62,24,694	10,37,89,19,09,774	21,77,72,98,87,819	8,65,33,23,23,944
C	Copper Cathode Originated Non- ASEAN Countries	87,20,28,43,248	8,77,04,57,75,192	10,68,38,57,05,321	13,90,67,40,07,021	31,80,62,41,87,974	15,41,12,14,58,411
D	Other Raw materials cost						

	Originated from Non-ASEAN Countries	23,96,35,781	2,40,36,80,337	2,69,72,47,048	3,24,31,64,661	10,28,46,64,774	3,81,77,20,891
E	FOB Sales Value of Copper Pipes	1,44,12,70,56,953	17,34,83,92,18,995	19,98,61,76,28,064	26,64,76,69,66,183	56,89,68,61,08,054	24,66,41,26,10,657
F	Non-AIFTA Content Percentage (after Indirect Method formula given in the Notification No. 189/2009 dated 31.12.2019) --- (C+D)/E <= 65%	61%	51%	54%	52%	56%	63%
ANNEXURE B (FOR ALL COMPANY SHIPMENT)							
No.	Particulars -----VND	2018.00	2019.00	2020.00	2021.00	2022.00	2023 TILL May 31
A	Total Raw Material Cost	248802561677.60	2663735284513.95	3240965511634.51	5967527182985.10	9364331814995.84	4530700517831.75
B	Copper Cathode Originated from ASEAN Countries	14343985499.20	1063974313095.95	767697823987.75	1738348575939.20	2784253131942.40	1340580762408.20
C	Copper Cathode Originated from Non- ASEAN Countries	232342226348.80	1595078920973.00	2465955120446.76	4215214103770.90	6569966976183.44	3179998407313.55
D	Other Raw materials cost originated from Non ASEAN Countries	2116349829.60	4682050445.00	7312567200.00	13964503275.00	10111706870.00	10121348110.00

Due to all material import can't match exactly same qty to export, if we buy more than after deduct the shipped qty, the balance will continue to be used next year. So we can't provide FOB value of 2018-2019 from material amount side. Simply if by qty check, the material we buy will count as below:

ANNEXURE C (REFERENCE FOR QTY OF CATHODE IMPORTED FROM ASEAN &NON ASEAN COUNTRIES)

	A	B	C	D	E	F	G	H	I
1	year	ASEAN	Non-ASEAN	total	%	round total%			
2	2018	100	1,742	1,842	5.43%	5.43%			
3	2019	7,276	11,297	18,573	39.17%	36.13%			
4	2020	5,500	16,656	22,156	24.82%	30.25%			
5	2021	8,200	20,033	28,233	29.04%	29.77%			
6	2022	13,225	31,686	44,911	29.45%	29.64%			
7	2023.1-5	6,408	15,327	21,735	29.48%	29.62%	No decide due to no finish		
8	2023.1-12	12,628	29,478	42,106	29.99%	29.70%			

The cathode we buy from ASEAN every year by round total calculate is min 29%, and fabrication of products is min 7%, which will be total min 36% of FOB value.

4.15 A letter dated 18.04.2024 [RUD14] and subsequent reminder letters dated 16.05.2024 & 30.05.2024 were written to representatives of both the Vietnamese companies for submitting the data related to import of Copper Tubes & Pipes for the calendar year 2023.

4.16 In reply, an email dated 03.07.2024 was received enclosing a letter dated 20.06.2024 [RUD15] from M/s. Surana Law Offices regarding submission of requested Additional Data of cost sheet for total production of the company as mentioned in the balance sheets as per the required format under Section 28DA of Customs Act, 1962 to claim AIFTA benefit under CAROTAR Rules, 2020-Reg. on behalf of M/s Jintian Copper Industrial (Vietnam) Company Ltd., enclosing the following details:

- a) Cost Sheet for the calendar year 2023.

Name of the Product	Copper Tubes & Pipes
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HSN		741110			
Quantity of Finished Goods Produced (MT)		43,634			
Total Sales (MT)		42,332			
Export to India (MT)		24,353			
S.No .	Particulars	1 January 2023 to 31 Dec 2023			
		Total		Exports to India	
		Qty (MT)	Value (VND)	Qty (MT)	Value (VND)
1	Copper Cathodes - Originated from ASEAN Countries	42,332	8,686,626,561,356	8,460	1,756,212,336,190
2	Copper Cathodes - Originated from Non-ASEAN Countries			16,183	3,259,275,827,294
3	Other Raw Materials - Originated from Non-ASEAN Countries			39	9,859,375,086
4	Utility Cost		103,767,850,139		57,928,230,187
5	Direct Wages & Salaries		36,301,290,678		20,265,135,296
6	Direct Overhead Cost		231,476,162,904		129,221,183,918
7	Other Cost		302,832,134,185		169,055,536,504
8	Total Cost of Sales		9,361,003,999,262		5,401,817,624,475
9	Sales		9,561,342,003,032		5,337,603,310,741
10	Profit (9-8)		200,338,003,770		-
11	FOB Value		9,495,581,639,210		64,214,313,734
					5,325,330,687,305

- b) Audited Financial Statement for the calendar year 2023.
- c) Excel summary of purchase of other raw material & consumables procured by M/s Jintian Copper Industrial (Vietnam) Company Ltd.
- d) Details of Copper Cathode purchase/sales by following subsidiaries/related companies of M/s Jintian Copper Industrial (Vietnam) Company Ltd:
- i. Jintian (Singapore) International Industry Pte. Ltd. sales to M/s Jintian Copper Industrial (Vietnam) Company Ltd.

ii. Hongkong Maytime International Industry Limited sales to M/s Jintian Copper Industrial (Vietnam) Company Ltd.

iii. Hongkong Maytime International Industry Limited purchase.

iv. Jintian (Singapore) International Industry Pte. Ltd. purchase.

v. M/s Jintian Copper Industrial (Vietnam) Company Ltd. supplier-wise purchase details for the year 2023.

Countr y of Origin	Name of Supplier	Name of Raw Material	HS Code	Qua ntity (MT)	Cur ren cy	USD/MT	Value (USD)	Value (VND)
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPH OR COPPER	7407 2900	2	US D	12,093.50	24,187	567,427,020
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPH OR COPPER	7407 2900	18	US D	10,515.33	189,276	4,408,238,040
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPH OR COPPER	7407 2900	20	US D	10,999.75	219,995	5,145,683,050
CHILE	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	1,481	US D	8,915.00	13,202,188	318,672,472,166
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	495	US D	8,515.00	4,218,655	107,968,497,831
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	501	US D	8,615.00	4,315,908	109,219,402,030
INDON ESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY	COPPER CATHOD	7403 1100	700	US D	8,615.00	6,030,388	152,606,435,573

	LIMITED	E						
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	200	US D	9,139.79	1,825,902	42,506,988,084
INDON ESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	600	US D	9,015.00	5,409,045	126,536,886,991
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	100	US D	8,480.60	851,690	21,556,611,166
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	200	US D	9,256.33	1,852,960	42,385,998,898
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	300	US D	8,480.60	2,541,907	64,336,700,422
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	496	US D	9,265.00	4,594,736	104,199,704,177
INDON ESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	500	US D	8,487.60	4,243,758	104,691,447,384
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	55	US D	10,200.4 5	563,014	13,168,893,718
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	400	US D	8,563.70	3,422,774	84,496,839,292
INDON ESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	9,275.20	4,637,572	106,718,573,582
INDON ESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	9,275.20	4,637,591	106,719,000,449
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	499	US D	9,015.00	4,500,414	106,275,686,540
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	499	US D	9,215.00	4,602,819	106,098,841,433
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	100	US D	9,103.44	910,462	21,115,334,172
INDON ESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	200	US D	9,215.00	1,842,945	42,743,925,978
INDON ESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	600	US D	9,215.00	5,528,936	127,446,610,089
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	501	US D	9,075.00	4,544,987	103,125,499,432
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	400	US D	9,164.10	3,662,845	82,261,528,003
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	501	US D	9,206.50	4,607,881	105,728,040,683
AUSTR ALIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	200	US D	9,254.17	1,851,001	42,004,691,053
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	501	US D	9,215.00	4,618,309	104,371,376,930
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHOD E	7403 1100	20	US D	9,848.00	192,519	4,506,859,256
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	41	US D	10,195.0 0	419,749	9,826,313,321
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	100	US D	9,066.58	905,429	20,849,727,275
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	400	US D	9,053.10	3,620,416	78,735,524,498
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	199	US D	9,960.05	1,985,148	41,386,849,379
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	199	US D	9,323.50	1,859,805	41,592,871,474
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	100	US D	8,926.71	894,064	20,883,697,732
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	801	US D	8,926.71	7,149,215	166,992,641,761
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	400	US D	8,926.71	3,570,595	83,402,594,883
JAPAN	HONGKONG MAYTIME	COPPER	7403		US			

	INTERNATIONAL INDUSTRY LIMITED	CATHOD E	1100	499	D	8,735.00	4,360,101	104,069,238,669
INDON ESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	405	US D	9,020.10	3,654,548	80,419,375,655
INDON ESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	300	US D	9,215.00	2,764,463	60,875,098,228
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	300	US D	9,215.00	2,762,970	60,505,001,222
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	501	US D	9,215.00	4,617,775	107,455,617,967
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	501	US D	8,975.72	4,492,447	104,286,261,652
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHOD E	7403 1100	21	US D	9,971.00	212,183	4,937,495,618
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	501	US D	9,215.00	4,619,599	99,192,201,519
INDON ESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	9,232.00	4,616,028	104,529,467,127
INDON ESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	9,232.00	4,616,129	104,531,766,901
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	200	US D	9,367.00	1,873,354	39,033,365,567
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	9,215.00	4,611,509	107,540,378,920
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	400	US D	9,053.10	3,618,289	84,269,943,590
AUSTR ALIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	99	US D	9,165.80	904,903	19,243,724,427
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	499	US D	9,175.00	4,579,004	94,787,903,050
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	501	US D	8,672.67	4,343,134	101,108,168,134
INDON ESIA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	203	US D	8,969.90	1,818,836	42,378,869,247
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	123	US D	8,815.00	1,082,235	23,904,445,726
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	499	US D	8,815.00	4,394,489	97,065,616,387
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	301	US D	8,552.80	2,571,143	59,635,262,285
INDON ESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8,587.80	4,293,934	97,826,601,874
INDON ESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	400	US D	8,587.80	3,435,120	78,260,655,360
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	174	US D	8,815.00	1,532,805	33,856,648,286
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHOD E	7403 1100	19	US D	9,872.00	192,336	4,481,432,994
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPH OR COPPER	7407 2900	20	US D	10108.90	202,178	4,710,747,400
CHINA	NINGBO JINTIAN IMPORT & EXPORT CO., LTD.	PHOSPH OR COPPER	7407 2900	20	US D	9564.20	191,284	4,632,898,480
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	400	US D	8605.09	3,441,064	80,176,782,346
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8569.98	4,288,469	99,921,337,253
AUSTR ALIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	101	US D	8369.28	847,323	19,751,090,971.5
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	502	US D	8669.75	4,355,180	101,562,787,106
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	100	US D	8521.23	851,388	19,854,359,298.4

JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	178	US D	8669.75	1,542,019	35,959,884,712.4
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	121	US D	8669.75	1,046,734	24,430,762,224
AUSTRALIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	202	US D	8521.23	1,718,954	40,206,325,639.6
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	499	US D	8520.92	4,253,405	100,210,214,260.8
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8631.35	4,311,877	101,587,827,067.6
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	100	US D	8580.26	858,515	20,226,615,049.2
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	400	US D	8412.25	3,366,843	79,322,826,498.8
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	201	US D	8585.26	1,723,062	40,448,872,938
AUSTRALIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	501	US D	8580.26	4,299,843	100,938,810,903.75
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	162	US D	8520.92	1,376,393	32,310,819,336.75
AUSTRALIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	201	US D	8486.77	1,705,654	40,031,700,788.2
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHOD E	7403 1100	19	US D	8296.00	160,810	3,774,202,720.20
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	138	US D	8520.92	1,175,060	27,578,668,292.1
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	800	US D	8399.95	6,719,977	157,919,454,800
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	498	US D	8399.95	4,186,165	98,709,782,018.4
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	100	US D	8486.77	848,719	20,012,804,159.4
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8329.4	4,166,616	98,248,799,620.8
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	401	US D	8186.75	3,279,235	77,291,579,792.2
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	200	US D	8491.77	1,698,362	40,030,403,889.3
AUSTRALIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	200	US D	8405.86	1,680,012	40,001,085,481.9
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHOD E	7403 1100	19	US D	8398.00	160,133	3,812,768,158.60
INDONESIA	PANASONIC VIETNAM CO., LTD.	COPPER CATHOD E	7403 1100	20	VN D	8701.78	174,036	4,151,619,240
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	100	US D	8405.86	838,199	20,016,185,911.2
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	400	US D	8142.13	3,257,862	77,797,735,485.6
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	800	US D	8076.04	6,460,872	154,285,632,434.4
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	200	US D	8410.86	1,680,751	40,136,323,372.8
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8298.3	4,147,515	99,042,663,692.4
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	502	US D	8076.04	4,056,498	97,538,493,929.1
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8440.86	4,220,430	102,218,814,600
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	299	US D	8287.63	2,479,518	60,053,926,202.2
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY	COPPER CATHOD	7403 1100	500	US D	8440.86	4,220,422	102,218,610,183

	LIMITED	E						.2
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	501	US D	8182	4,099,387	99,287,142,241
AUSTRALIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	201	US D	8074.66	1,619,518	39,224,735,890.2
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	100	US D	8074.66	810,518	19,671,277,199.4
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8079.66	4,040,573	98,064,714,719.1
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	101	US D	8287.63	840,200	20,391,652,301.1
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHOD E	7403 1100	19	US D	7849.00	149,523	3,643,886,476.50
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8109.66	4,054,822	98,978,202,334.9
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8109.66	4,054,814	98,978,004,369.8
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	800	US D	8378.37	6,702,696	163,612,809,360
JAPAN	PANASONIC VIETNAM CO., LTD.	COPPER CATHOD E	7403 1100	19	VN D	8592.83	163,006	3,987,126,399.00
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8313.95	4,160,109	100,633,045,418.4
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8378.37	4,192,662	101,420,494,263.8
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	400	US D	8480.38	3,388,633	81,716,876,113.6
JAPAN	HEIWA KINZOKU CO., LTD	COPPER CATHOD E	7403 1100	19	US D	7781.00	149,909	3,615,049,506.25
AUSTRALIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	201	US D	8529.11	1,714,539	41,234,656,937.5
CHINA	JINTIAN (SINGAPORE) INTERNATIONAL INDUSTRY PTE.LTD.	COPPER CATHOD E	7403 1100	401	US D	8413	3,377,323	81,224,621,276.5
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	300	US D	8308.95	2,489,145	59,863,946,629.5
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	100	US D	8529.11	850,412	20,452,407,878.5
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	501	US D	8547.53	4,283,766	103,195,913,544.9
JAPAN	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	494	US D	8681.01	4,286,396	103,259,285,903.4
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	800	US D	8547.53	6,838,041	164,728,410,099
CHILE	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	50	US D	8230.00	411,755	9,919,181,081.7
CHINA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8534.11	4,268,830	102,836,116,868.1
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	800	US D	8454.3	6,763,448	163,404,914,552
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8564.11	4,282,038	103,454,034,939.2
INDONESIA	HONGKONG MAYTIME INTERNATIONAL INDUSTRY LIMITED	COPPER CATHOD E	7403 1100	500	US D	8564.11	4,282,021	103,453,621,078.4
JAPAN	PANASONIC VIETNAM CO., LTD.	COPPER CATHOD E	7403 1100	20	VN D	8397.08	167,001	4,079,837,526

4.17 In reply of the above letters, this office received an email dated 11.08.2024 from M/s. Tri-legal regarding Submission of relevant documents under Section 28DA of Customs Act, 1962 to claim AIFTA benefit under CAROTAR Rules, 2020 - Response to Letter dated 18 April

2024 on behalf of M/s. Hailiang (Vietnam) Copper Manufacturing Co. Ltd., enclosing the additional documents containing relevant details. The relevant details from these documents are reproduced as below: -

a) RVC calculation for the calendar year 2023.

Analysis of RVC (Exports to India)			
S.No.	Particulars	UOM	2023
A	Copper Cathode Originated from ASEAN Countries (HSN - 74031100)	VND (Lakhs)	24,096,203
B	Copper Cathode Originated from Non-ASEAN Countries (HSN - 74031100)	VND (Lakhs)	38,656,868
C	Other Raw Material Cost Originated from Non-ASEAN Countries	VND (Lakhs)	144,329
D	Utility Cost	VND (Lakhs)	568,354
E	Direct Wages & Salaries	VND (Lakhs)	353,024
F	Direct Overhead Cost	VND (Lakhs)	1,483,751
G	Other Cost	VND (Lakhs)	323,730
H	Total Cost	VND (Lakhs)	65,626,259
I	Profit	VND (Lakhs)	4,859,079
J	FOB Sales Value of Copper Pipes (HSN - 74111000)	VND (Lakhs)	70,485,338
RVC Analysis			
K	RVC (A+D+E+F+G+I "OR" J-B-C)	VND (Lakhs)	31,684,141
L	RVC (K / J)	%	45%

b) Cost Sheet for the calendar year 2023.

Name of the Product		Copper Tubes & Pipes			
HSN		74111000			
Quantity of Finished Goods Produced (MT)		80			
Total Sales (MT)		42			
Export to India (MT)		69			
S.No	Particulars	1 January 2023 to 31 December 2023			
		Total		Exports to India	
		Qty (MT)	Value (VND)	Qty (MT)	Value (VND)
1	Copper Cathode	60,874	12,581,670,925,615.00	31,062	6,275,307,024,019.78
	Originated from ASEAN Countries	12,704	2,409,620,269,602	12,704	2,409,620,269,601.51
	Originated from Non-ASEAN Countries	48,171	10,143,113,386,510.60	18,359	3,865,686,754,418.27
2	Other Raw Materials - Originated from Non-ASEAN Countries		28,937,269,503		14,432,920,050.24
3	Utility Cost		110,039,364,138		56,835,383,473.25
4	Direct Wages & Salaries		68,349,289,768		35,302,440,399.57
6	Direct Overhead Cost		287,269,941,698		148,375,060,367.20
7	Other Cost		62,677,668,943		32,373,045,568.65
8	Total Cost of Sales		13,138,944,459,665		6,562,625,873,878.68
9	FOB Value	59,242	13,646,713,173,517	31,210	7,048,533,790,086.00
10	Profit (10-9)	59,242	507,768,713,852	31,210	485,907,916,207.32

c) Details of Copper Cathode purchase by M/s Hailiang (Vietnam) Copper Manufacturing Co. Ltd. along with copies of invoices & respective bills of lading.

Year	Origin of Material	ASEAN	Supplier Name	QTY.	Unit	Invoice Value	Curr ency	VND Value
2023	CONGO	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	500,616.00	KG	4,170,131.28	USD	98,340,035,844.96
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	39,859.00	KG	407,558.28	USD	9,611,039,358.96
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	481,909.00	KG	4,144,417.40	USD	97,733,651,126.80
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	432,250.00	KG	3,717,350.00	USD	87,662,547,700.00
2023	CONGO	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	510,350.50	KG	4,348,186.26	USD	102,538,928,383.32
2023	CONGO	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	521,987.00	KG	4,489,088.20	USD	105,861,677,932.40
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	493,671.00	KG	4,136,962.98	USD	97,557,860,994.36
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	170,242.00	KG	1,510,577.70	USD	35,622,443,321.40
2023	POLAND	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	504,952.00	KG	4,246,646.32	USD	100,144,413,518.24
2023	INDONESIA	ASEAN	Hong Kong Hailiang Metal Trading Limited	69,990.00	KG	588,265.95	USD	13,872,487,632.90
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	118,961.00	KG	980,911.96	USD	22,998,461,814.16
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	497,912.00	KG	4,588,259.08	USD	107,576,322,389.68
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	39,350.00	KG	402,353.75	USD	9,433,586,022.50
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	700,008.00	KG	6,461,073.84	USD	151,486,337,252.64
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	500,002.00	KG	4,617,518.47	USD	108,262,338,047.62
2023	INDONESIA	ASEAN	Hong Kong Hailiang Metal Trading Limited	749,992.00	KG	6,903,676.36	USD	161,863,595,936.56
2023	INDONESIA	ASEAN	Hong Kong Hailiang Metal Trading Limited	749,993.00	KG	6,903,685.57	USD	161,863,811,874.22
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	499,363.00	KG	4,495,765.09	USD	105,407,708,300.14
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	500,775.00	KG	4,569,571.88	USD	107,138,182,298.48
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	299,983.60	KG	2,774,848.30	USD	65,059,093,241.80
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	501,382.40	KG	4,612,718.08	USD	108,149,788,103.68
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	499,367.40	KG	4,594,180.08	USD	107,715,146,155.68
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	301,811.20	KG	2,695,174.02	USD	63,191,050,072.92
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	201,112.40	KG	1,795,933.73	USD	42,107,462,233.58
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	301,069.20	KG	2,688,547.96	USD	63,035,695,470.16
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	201,045.40	KG	1,795,335.42	USD	42,093,434,257.32
2023	INDONESIA	ASEAN	Hong Kong Hailiang Metal Trading Limited	100,010.00	KG	901,190.11	USD	21,129,303,319.06
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	499,866.60	KG	4,488,802.07	USD	106,941,220,515.68
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	399,723.50	KG	3,589,517.03	USD	85,516,653,722.72
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	38,595.00	KG	394,633.88	USD	9,401,757,557.12
2023	MALYSIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	99,117.10	KG	882,142.19	USD	21,016,155,534.56
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	418,996.00	KG	3,729,064.40	USD	88,841,230,265.60
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	41,045.00	KG	375,363.91	USD	8,942,669,791.84
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	200,479.00	KG	1,784,263.10	USD	42,508,284,094.40
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	299,213.00	KG	2,662,995.70	USD	63,443,209,556.80
2023	AUSTRALIA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	96,126.00	KG	855,809.78	USD	20,388,812,198.72
2023	AUSTRALIA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	391,986.00	KG	3,489,851.36	USD	83,142,218,800.64
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	499,467.90	KG	4,445,264.31	USD	105,903,976,921.44
2023	INDONESIA	ASEAN	Hong Kong Hailiang Metal Trading Limited	74,998.00	KG	660,657.38	USD	15,739,501,421.12
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	500,486.00	KG	4,454,325.40	USD	106,119,848,329.60
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	284,764.00	KG	2,520,161.40	USD	60,040,325,193.60
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	500,048.00	KG	4,450,427.20	USD	106,026,977,612.80
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	299,992.00	KG	2,608,430.44	USD	62,143,246,802.56

2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	299,244.10	KG	2,663,272.49	USD	63,449,803,801.76
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	300,012.00	KG	2,608,604.34	USD	62,147,389,796.16
2023	CHILE	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	500,884.00	KG	4,409,281.85	USD	105,046,730,794.40
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	464,740.00	KG	4,159,423.00	USD	99,094,093,552.00
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	59,180.00	KG	70,660,920	JPY	12,364,954,390.80
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	200,726.40	KG	1,791,483.12	USD	42,680,293,850.88
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	449,997.00	KG	3,878,974.14	USD	92,412,679,911.36
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	125,573.00	KG	1,123,878.35	USD	26,377,424,874.50
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	199,239.00	KG	1,753,303.20	USD	41,150,026,104.00
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	100,334.00	KG	882,939.20	USD	20,722,583,024.00
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	499,966.00	KG	4,439,698.08	USD	104,199,713,937.60
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	500,318.00	KG	4,452,830.20	USD	104,507,924,794.00
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	299,998.00	KG	2,675,982.16	USD	62,805,301,295.20
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	299,987.00	KG	2,675,884.04	USD	62,802,998,418.80
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	549,996.00	KG	4,905,964.32	USD	115,142,982,590.40
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	299,994.00	KG	2,585,948.28	USD	60,692,206,131.60
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	19,432.00	KG	160,216.84	USD	3,760,289,234.80
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	18,929.00	KG	172,892.94	USD	4,057,797,301.80
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	299,865.00	KG	2,676,295.13	USD	62,812,646,701.10
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	19,727.00	KG	23,554,038	JPY	4,155,638,924.34
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	512,597.00	KG	4,536,483.45	USD	106,471,266,571.50
2023	INDONESIA	ASEAN	Hong Kong Hailiang Metal Trading Limited	235,000.00	KG	2,117,115.00	USD	49,688,689,050.00
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	499,986.00	KG	4,399,876.80	USD	103,265,108,496.00
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	100,603.00	KG	120,119,982	JPY	21,192,768,424.26
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	499,998.00	KG	4,399,982.40	USD	103,267,586,928.00
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	499,993.00	KG	4,399,938.40	USD	103,266,554,248.00
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	320,217.00	KG	2,849,931.30	USD	66,887,887,611.00
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	319,573.00	KG	2,844,199.70	USD	66,753,366,959.00
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	289,299.00	KG	2,574,761.10	USD	60,385,872,078.30
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	38,659.00	KG	318,743.46	USD	7,475,490,367.38
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	323,608.00	KG	3,009,554.40	USD	70,583,079,343.20
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	499,595.90	KG	4,496,363.10	USD	105,453,203,784.30
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	500,581.00	KG	4,662,912.02	USD	109,359,275,605.06
2023	CONGO	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	255,032.00	KG	2,290,187.36	USD	53,711,764,154.08
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	270,280.00	KG	2,459,548.00	USD	57,683,779,244.00
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	372,592.00	KG	3,390,587.20	USD	79,519,441,601.60
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	349,083.00	KG	3,176,655.30	USD	74,502,096,750.90
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	127,182.00	KG	1,144,638.00	USD	26,845,195,014.00
2023	CONGO	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	317,559.00	KG	2,851,679.82	USD	66,880,446,818.46
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	200,841.40	KG	1,827,054.22	USD	42,849,902,621.66
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	299,505.00	KG	2,724,596.99	USD	63,899,973,206.47
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	337,563.00	KG	2,987,432.55	USD	70,064,255,595.15
2023	CHILE	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	399,973.00	KG	3,440,967.72	USD	80,701,015,937.16
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	504,922.00	KG	4,291,837.00	USD	100,656,453,161.00
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	59,882.00	KG	71,499,108	JPY	12,517,348,837.56
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE)	500,009.00	KG	4,450,080.10	USD	104,367,728,585.30

			PTE. LTD.	0				
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	200,802.40	KG	1,724,892.62	USD	40,505,653,395.46
2023	CONGO	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	502,547.00	KG	4,302,304.87	USD	101,031,025,262.21
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	78,878.00	KG	94,180,332	JPY	15,827,004,792.60
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	392,792.00	KG	3,338,732.00	USD	78,403,443,556.00
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	38,388.00	KG	352,242.91	USD	8,271,720,255.53
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	39,483.00	KG	325,537.34	USD	7,644,593,355.22
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	299,938.70	KG	2,579,472.82	USD	60,573,760,232.06
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	299,842.00	KG	2,575,642.78	USD	60,483,819,402.74
2023	AUSTRALIA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	498,692.00	KG	4,439,854.88	USD	104,261,112,147.04
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	500,817.00	KG	4,307,026.20	USD	101,141,896,254.60
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	301,370.00	KG	2,652,056.00	USD	62,532,828,424.00
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	200,765.40	KG	1,766,735.52	USD	41,657,856,826.08
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	39,900.00	KG	328,975.50	USD	7,756,913,314.50
2023	THAILND	ASEAN	Hong Kong Hailiang Metal Trading Limited	205,060.00	KG	1,804,733.06	USD	42,553,800,821.74
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	499,555.00	KG	4,408,572.88	USD	103,949,739,937.52
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	514,479.00	KG	4,527,415.20	USD	106,751,923,000.80
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	493,235.00	KG	4,340,468.00	USD	102,343,894,972.00
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	500,707.00	KG	4,406,221.60	USD	103,894,299,106.40
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	38,605.00	KG	328,057.96	USD	7,735,278,638.84
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	19,509.00	KG	160,851.71	USD	3,792,722,470.09
2023	AUSTRALIA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	302,422.00	KG	2,662,220.87	USD	62,772,505,893.73
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	301,370.00	KG	2,652,056.00	USD	62,532,828,424.00
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	200,765.40	KG	1,766,735.52	USD	41,657,856,826.08
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	39,900.00	KG	328,975.50	USD	7,756,913,314.50
2023	THAILND	ASEAN	Hong Kong Hailiang Metal Trading Limited	205,060.00	KG	1,804,733.06	USD	42,553,800,821.74
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	499,555.00	KG	4,408,572.88	USD	103,949,739,937.52
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	514,479.00	KG	4,527,415.20	USD	106,751,923,000.80
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	493,235.00	KG	4,340,468.00	USD	102,343,894,972.00
2023	CHINA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	500,707.00	KG	4,406,221.60	USD	103,894,299,106.40
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	38,605.00	KG	328,057.96	USD	7,735,278,638.84
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	19,509.00	KG	160,851.71	USD	3,792,722,470.09
2023	AUSTRALIA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	302,422.00	KG	2,662,220.87	USD	62,772,505,893.73
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	570,071.00	KG	5,016,624.80	USD	118,823,775,012.80
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	201,297.40	KG	1,777,456.04	USD	42,100,823,763.44
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	299,787.00	KG	2,647,119.21	USD	62,699,665,608.06
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	212,340.00	KG	1,868,804.34	USD	44,264,499,597.24
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	209,630.00	KG	1,844,953.63	USD	43,699,571,680.18
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	290,170.00	KG	2,553,786.17	USD	60,488,979,222.62
2023	CHILE	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	249,926.00	KG	2,200,098.58	USD	52,111,534,965.88
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	238,820.00	KG	2,078,928.10	USD	49,241,490,976.60
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	207,840.00	KG	1,809,247.20	USD	42,853,829,179.20
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	287,890.00	KG	2,506,082.45	USD	59,359,068,910.70
2023	MALYSIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	497,815.00	KG	4,343,435.88	USD	102,878,622,253.68
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	489,406.00	KG	4,248,044.08	USD	100,619,172,078.88
2023	R.KOREA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	20,000.00	KG	195,760.00	USD	4,636,771,360.00

2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	19,604.00	KG	161,634.98	USD	3,896,534,462.86
2023	INDONESIA	ASEAN	Hong Kong Hailiang Metal Trading Limited	38,973.00	KG	328,657.36	USD	7,922,942,977.52
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	288,730.00	KG	2,513,394.65	USD	60,590,404,827.55
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	211,760.00	KG	1,843,370.80	USD	44,438,139,875.60
2023	INDONESIA	ASEAN	Hong Kong Hailiang Metal Trading Limited	38,000.00	KG	315,089.92	USD	7,595,872,701.44
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	211,550.00	KG	1,809,810.25	USD	43,629,095,696.75
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	499,751.00	KG	4,128,942.76	USD	99,536,423,115.32
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	237,130.00	KG	1,850,799.65	USD	44,617,227,162.55
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	238,078.00	KG	1,858,198.79	USD	44,795,598,230.53
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	238,630.00	KG	1,862,507.15	USD	44,899,459,865.05
2023	INDONESIA	ASEAN	Hong Kong Hailiang Metal Trading Limited	51,000.00	KG	423,441.27	USD	10,207,898,695.89
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	619,281.00	KG	4,830,391.80	USD	116,446,255,122.60
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	200,094.40	KG	1,600,755.20	USD	38,589,405,606.40
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	301,235.20	KG	2,409,881.60	USD	58,095,015,731.20
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	19,372.00	KG	159,819.00	USD	3,852,756,633.00
2023	POLAND	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	19,663.00	KG	152,250.61	USD	3,670,305,455.27
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	24,995.00	KG	205,308.93	USD	4,949,382,375.51
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	39,110.00	KG	326,625.60	USD	7,873,963,339.20
2023	CHILE	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	253,275.00	KG	2,051,527.50	USD	49,456,173,442.50
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	500,010.00	KG	3,900,578.01	USD	94,031,234,087.07
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	500,000.00	KG	4,052,500.00	USD	98,804,002,500.00
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	500,000.00	KG	4,052,500.00	USD	98,804,002,500.00
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	236,681.00	KG	1,847,295.21	USD	45,038,904,515.01
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	237,511.00	KG	1,853,773.36	USD	45,196,848,290.16
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	334,969.00	KG	2,612,758.20	USD	63,701,657,674.20
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	52,553.00	KG	410,176.17	USD	10,000,505,200.77
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	496,308.00	KG	3,871,202.40	USD	94,383,785,714.40
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	314,685.00	KG	2,456,116.43	USD	59,882,574,679.83
2023	CHILE	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	500,469.00	KG	3,855,112.71	USD	93,991,502,982.51
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	514,069.00	KG	4,112,552.00	USD	100,268,130,312.00
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	491,473.00	KG	3,931,784.00	USD	95,860,825,704.00
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	39,998.00	KG	343,736.01	USD	8,380,627,659.81
2023	INDONESIA	ASEAN	Hong Kong Hailiang Metal Trading Limited	96,795.00	KG	831,839.77	USD	20,281,085,432.37
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	500,915.00	KG	4,034,870.33	USD	99,108,519,915.79
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	235,246.00	KG	1,905,727.85	USD	46,810,393,179.55
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	289,764.00	KG	2,289,425.36	USD	56,235,155,117.68
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	496,246.00	KG	3,994,780.30	USD	98,123,788,508.90
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	237,181.00	KG	1,922,352.01	USD	47,218,732,421.63
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	200,221.40	KG	1,611,782.27	USD	39,590,207,898.01
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	299,238.00	KG	2,408,865.90	USD	59,168,973,101.70
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	199,136.60	KG	1,603,049.63	USD	39,375,708,061.69
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	300,520.60	KG	2,419,190.83	USD	59,422,584,357.29
2023	INDONESIA	ASEAN	Hong Kong Hailiang Metal Trading Limited	99,998.00	KG	816,062.68	USD	20,044,947,608.84
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	498,979.00	KG	3,944,429.00	USD	96,887,009,527.00
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	235,758.00	KG	1,909,875.56	USD	46,912,273,380.28
2023	CHINA	Non-	HAILIANG (SINGAPORE)	500,285.0	KG	4,109,841.28	USD	100,950,031,360.64

		ASEAN	PTE. LTD.	0				
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	499,330.00	KG	4,019,606.50	USD	98,733,594,459.50
2023	R.KOREA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	20,000.00	KG	185,540.00	USD	4,557,419,020.00
2023	AUSTRALIA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	503,254.00	KG	3,926,890.96	USD	95,270,301,580.56
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	239,944.00	KG	1,900,356.48	USD	46,104,548,561.28
2023	JAPAN	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	38,868.00	KG	316,789.36	USD	7,685,626,662.96
2023	AUSTRALIA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	502,130.00	KG	3,918,120.39	USD	95,057,518,781.79
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	515,819.00	KG	4,023,388.20	USD	97,611,421,120.20
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	489,853.00	KG	3,820,853.40	USD	92,697,724,337.40
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	201,244.00	KG	1,569,706.32	USD	38,082,645,029.52
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	298,947.00	KG	2,331,786.60	USD	56,571,474,702.60
2023	AUSTRALIA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	500,938.00	KG	3,908,819.21	USD	94,831,862,853.81
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	101,803.00	KG	804,243.70	USD	19,511,756,405.70
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	154,354.00	KG	1,219,396.60	USD	29,583,780,912.60
2023	AUSTRALIA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	501,386.00	KG	3,912,314.96	USD	94,916,673,244.56
2023	CHINA	Non-ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	493,672.00	KG	3,900,008.80	USD	94,618,113,496.80
2023	INDONESIA	ASEAN	Hong Kong Hailiang Metal Trading Limited	99,996.00	KG	828,949.84	USD	20,111,152,068.24
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	692,983.00	KG	5,543,864.00	USD	134,499,684,504.00
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	249,927.00	KG	1,975,672.94	USD	47,931,801,197.34
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	258,152.00	KG	2,040,691.56	USD	49,509,217,937.16
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	49,865.20	KG	393,935.08	USD	9,557,258,975.88
2023	INDONESIA	ASEAN	HAILIANG (SINGAPORE) PTE. LTD.	498,417.00	KG	3,939,986.39	USD	95,588,009,807.79
2023	R.KOREA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	20,000.00	KG	189,000.00	USD	4,585,329,000.00
2023	AUSTRALIA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	500,306.00	KG	4,003,948.92	USD	97,139,804,748.12
2023	CONGO	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	283,488.00	KG	2,297,670.24	USD	55,743,777,692.64
2023	JAPAN	Non-ASEAN	Hailiang Japan Co., Ltd.	60,101.00	KG	71,760,594	JPY	11,837,627,586.24
2023	AUSTRALIA	Non-ASEAN	Hong Kong Hailiang Metal Trading Limited	501,900.00	KG	4,016,705.70	USD	97,449,296,987.70

- d) Excel summary of purchase of other raw material & consumables procured by M/s. Hailiang (Vietnam) Copper Manufacturing Co. Ltd.
- e) Sales ledger showing Indian Sales of M/s Hailiang (Vietnam) Copper Manufacturing Co. Ltd.
- f) Sample Form I.

5. The documents related to Suppliers were examined in the light of Notification No. 189/2009 (N.T.) dated 31.12.2009 and Indirect Method on the total production of the supplier has been used to calculate the AIFTA Value Content in the imported goods.

5.1 In Table-A below, in case of **M/s. Jintian Copper Industrial (Vietnam) Company Ltd.**, total Raw Material Cost and FOB Sales Value of Copper Pipes are taken from the Cost Break-up Sheet of the Supplier and Cost of Copper Cathode Originated from ASEAN Countries has been taken from the details of purchase of raw material as submitted by the importer through their authorized representative. The difference between total raw material cost and cost of copper cathode originated from ASEAN Countries has been taken as the value of copper cathode & other raw materials sourced from Non-ASEAN countries in row C. In row D is the FOB value of the copper pipes whereas in row E is Non-AIFTA Content Percentage.

TABLE-A

M/s. Jintian Copper Industrial (Vietnam) Company Ltd. RVC ANALYSIS (Amount in VND Lakhs)						
S. No.	Particulars	2019	2020	2021	2022	2023
A	Total Raw Material Cost	22970105.54	33272644.18	58789335.22	88004282.28	86866265.61
B	Cost of Copper Cathode Originated from ASEAN Countries	10,639,743.13	7,676,978.24	17,383,485.76	27,842,531.32	27536888.42
C	Cost of Copper Cathode &Other Raw materials Originated from Non-ASEAN Countries	12,330,362.41	25,595,665.94	41,405,849.46	60,161,750.96	59,329,377.19
D	FOB Value of Copper Pipes	25,590,732.53	36,935,432.61	61,919,579.34	97,059,509.39	94955816.39
E	Non-AIFTA Content Percentage of FOB Value of Copper Pipes	48.18	69.30	66.87	61.98	62.48

5.2 In Table-B below, in case of **M/s Hailiang (Vietnam) Copper Manufacturing Co. Ltd.** total Raw Material Cost and FOB Sales Value of Copper Pipes are taken from the Cost Break-up Sheet of the Supplier and Cost of Copper Cathode Originated from ASEAN Countries has been taken from the details of purchase of raw material as submitted by the importer through their authorized representative. The difference between total raw material cost and Cost of Copper Cathode Originated from ASEAN Countries has been taken as the value of copper cathode & other raw materials sourced from Non-ASEAN countries in row C and Row D combined. In row E is the FOB value of the copper pipes whereas in row F is Non-AIFTA Content Percentage.

TABLE- B

M/s. HAILIANG RVC ANALYSIS (Amount in VND Lakhs)						
S. No.	Particulars	2019	2020	2021	2022	2023
A	Total Raw Material Cost	93974741.62	96447284.94	84879819.99	122338484.43	125816709.25
B	Cost of Copper Cathode Originated from ASEAN Countries	16511836.45	26232185.02	16307580.55	24084834.81	26975897.00
C	Cost of Copper Cathode Originated from Non-ASEAN Countries	77,462,905.17	70,215,099.92	68,572,239.44	98,253,649.62	98,840,812.25
D	Other Raw materials cost originated from Non- ASEAN Countries					
E	FOB Sales Value of Copper Pipes	104,667,913.93	107,839,757.61	91,463,454.36	137,183,645.46	136,467,131.74
F	Non-AIFTA Content Percentage	74.01	65.11	74.97	71.62	72.43

6. Importer’s Statement dated 25.03.2025 [RUD17] with respect to summon dated 06.03.2025 [RUD16] issued to **M/s. Akshay Impex.**

Q. 1. Please introduce yourself in brief?

Ans1. My name is **UPENDRA KUMAR ACHALCHAND JAIN**, son of **SHRI ACHALCHAND JAIN**. I am 58 years old. I have done Graduation asB.Com from Gujrat University, Ahmedabad.

Q. 2: Please tell about your role in the firm M/s. Akshay Impex?

Ans2. M/s. Akshay Impex is Proprietorship firm and I am Proprietor of this firm. I look after all the activities of this firm.

Q3. What kind of business activities are carried out by M/s. Akshay Impex?

Ans3. M/s. Akshay Impex is trading of copper pipes and tubes and copper fittings..

Q4. Who looks after the purchase activities in your firm including overseas purchases?

Ans4. Shri Ketan Patel, Accounts Manager looks after the overseas purchase as well as local purchase activities of the firm.

Q5. What are the materials your firm is trading ?

Ans5. We are trading copper pipes and tubes only.

Q6. From where you procure Copper tubes & pipes for your company?

Ans6. We were importing Copper tubes & pipes majorly from Vietnam to meet our customer requirements.

Q7. Who is your supplier of Copper tubes & pipes from Vietnam?

Ans7. M/s. Jintian Copper Industrial Vietnam Company Limited & M/s. Hailaing (Vietnam) are our suppliers of Copper tubes & pipes from Vietnam.

Q8. Since when you are importing Copper Tubes & Pipes from Vietnam?

Ans8. We are importing Copper Tubes & Pipes from Vietnam since 2018-19.

Q9. Who is your Customs Broker for clearance of Imported Cargo?

Ans9. M/s. Surat Forwarding Private Limited is looking after our Customs clearance for more than 6 years

Q10. Are you aware of the ASEAN India Free Trade Agreement under which you have imported Copper Tubes & Pipes from Vietnam (a participating country of AIFTA)?

Ans10. I am not aware of ASEAN India Free Trade Agreement under which we have imported Copper Tubes & Pipes from Vietnam. I am shown the copies of AIFTA Notification No. 46/2011 dated 01.06.2011 read with Customs Notification No. 189/2009 (N.T.) dated 31.12.2009 by virtue of which we have paid BCD @0% on the imports of Copper Tubes & Pipes from Vietnam and a token of having seen the same I am putting my dated signature on the same.

Q11. This office has issued letter F.NoGEN/ADT /PCA/332/2022 /I/1208219/2023 dated 24.05.2023 to Importers of Copper Pipes and Tubes under Jaipur jurisdiction of this commissionerate regarding 'Documents required under Section 28DA of Customs Act, 1962 to claim AIFTA benefit under CAROTAR Rules, 2020' mentioning

Section 28DA of the Customs Act 1962, Section 28DA talks about the procedure regarding claim of preferential rate of duty. As you have also purchased copper pipes and tubes from same suppliers from Vietnam, you are requested to submit the details asked in the same letter to this office. Also, please comment about supplier’s production process and their cost of raw materials to fulfill regional value criteria.

Ans 11. We have submitted all the information in the form of COO along with Form I to fulfill regional value criteria.

Q.12 Please see and peruse the cost break up of total production of copper tubes & pipes reproduced below (Table – A regarding M/s. Jintian Copper Industrial (Vietnam) Company Ltd. RVC ANALYSIS (Amount in VND Lakhs)and Table-B regarding HAILIANG RVC ANALYSIS (Amount in VND Lakhs)) submitted by your supplier through their authorised representative. Based on the cost break up of total production of copper tubes & pipes submitted by your supplier through their authorised representative and investigation carried out by this office it has come to light that the criteria of 35% AIFTA content is not getting fulfilled (using indirect method of calculation) on the imported goods. Please comment on the same.

TABLE-A

M/s. Jintian Copper Industrial (Vietnam) Company Ltd. RVC ANALYSIS (Amount in VND Lakhs)						
S. No .	Particulars	2019	2020	2021	2022	2023
A	Total Raw Material Cost	22970105.54	33272644.18	58789335.22	88004282.28	86866265.61
B	Cost of Copper Cathode Originated from ASEAN Countries	10,639,743.13	7,676,978.24	17,383,485.76	27,842,531.32	27536888.42
C	Cost of Copper Cathode & Other Raw materials Originated from Non-ASEAN Countries	12,330,362.41	25,595,665.94	41,405,849.46	60,161,750.96	59,329,377.19
D	FOB Value of Copper Pipes	25,590,732.53	36,935,432.61	61,919,579.34	97,059,509.39	94955816.39
E	Non-AIFTA Content Percentage of FOB Value of Copper Pipes	48.18	69.30	66.87	61.98	62.48

TABLE- B

HAILIANG RVC ANALYSIS (Amount in VND Lakhs)						
S. No .	Particulars	2019	2020	2021	2022	2023

A	Total Raw Material Cost	93974741.62	96447284.94	84879819.99	122338484.43	125816709.25
B	Copper Cathode Originated from ASEAN Countries	16511836.45	26232185.02	16307580.55	24084834.81	26975897.00
C	Copper Cathode Originated from Non- ASEAN Countries	77,462,905.17	70,215,099.92	68,572,239.44	98,253,649.62	98,840,812.25
D	Other Raw materials cost originated from Non- ASEAN Countries					
E	FOB Sales Value of Copper Pipes	104,667,913.93	107,839,757.61	91,463,454.36	137,183,645.46	136,467,131.74
F	Non-AIFTA Content Percentage	74.01	65.11	74.97	71.62	72.43

Ans 12. We have submitted all the information in the form of COO along with Form I to fulfill regional value criteria. We are not aware of suppliers raw material import export data.

Q13. The documents submitted by your supplier through their authorised representative don't provide any valid proof and are insufficient that the raw material procured from ASEAN Countries are used for manufacturing of Copper Tubes & Pipes supplied to India only we need to check the Origin Criteria on the their total production only. Please comment on the same.

Ans13.We have no information available with us about suppliers data. We have submitted all the information in the form of COO along with Form I to fulfill regional value criteria.

Q.14. You have incorrectly availed above-discussed notification benefit regarding duty exemption. When do you plan to pay the differential duty along with applicable interest?

Ans14. We need time to look into this matter deeply, we will check with our supplier. At this point we are not liable to pay any duty or interest.

Q15. Do you want to say anything else?

Ans15.We are providing all relevant information within our control at the time of the import.

6.1 During the course of investigation Importer was issued a summon dated 06.03.2025 for giving their voluntary statement in the present matter, importer presented themselves on

25.03.2025. During statement the importer when confronted regarding the apparent discrepancies under the Customs Act specifically Section 28DA of Customs Act, 1962, consistently provided non-committal and evasive statements to navigate legal and regulatory scrutiny and failed to provide clear and definitive explanations. Despite being afforded multiple opportunities to clarify their position, the importer relied on vague responses such as ‘We are not aware of suppliers raw material import export data’. Such conduct indicates a deliberate attempt to avoid responsibility and accountability and obfuscate the facts. Importer’s non-committal statement coupled with the discrepancies identified in the import declarations and supporting documents, undermines the importer's credibility and strongly suggests the conclusion that there has been a willful violation of the provisions of the Customs Act.

6.2 The documents submitted by the suppliers through their authorized representative lack any valid evidence to establish that the raw materials procured from ASEAN countries are exclusively utilized in the manufacturing of Copper Tubes and Pipes supplied specifically to India. Additionally, the AIFTA rules do not provide any defined mechanism or framework to verify such claims or ensure that the origin of the raw materials aligns with the criteria for preferential treatment under the agreement. In light of these limitations, it becomes essential to conduct a comprehensive examination of the Origin Criteria by analyzing not only the specific production processes related to the goods supplied to India but also the suppliers' overall production records. This approach will enable a thorough assessment of compliance with the prescribed rules of origin and ensure the integrity of the preferential trade arrangement.

TABLE-1

Jiantian Vietnam - Monthly data analysis of purchase and sales of Copper Chathode (Quantity in MT)					
		2020	2021	2022	2023 (Till July 2024)
		Quantity in Kgs	Quantity in Kgs	Quantity in Kgs	Quantity in Kgs
Jan	From ASEAN	1,299.96	2,000.00	600.00	2,575.01
	From Non-ASEAN	3,311.71	3,318.62	835.06	3,900.00
	Total Sales to India	2,237	3,747	3,025	3,221
Feb	From ASEAN	0.00	2,500.00	500.00	1,300.00
	From Non-ASEAN	500.05	3,215.54	1,795.35	2,167.48
	Total Sales to India	2,598	2,779	2,343	4,291
March	From ASEAN	0.00	300.00	900.00	2,099.99
	From Non-ASEAN	2,019.42	2,761.59	1,342.53	2,560.38
	Total Sales to India	2,429	3,808	4,044	7,215
April	From ASEAN	800.02	1,000.00	1,599.99	199.99
	From Non-ASEAN	1,000.86	2,768.30	2,341.16	3,122.26
	Total Sales to	875	3,016	3,796	4,091

	India				
May	From ASEAN	800.00	2,000.09	599.99	1,502.78
	From Non-ASEAN	0.00	2495.12	1,866.80	3,101.33
	Total Sales to India	937	2,119	3,554	4,716
June	From ASEAN	1,600.00	0.00	600.01	1,305.16
	From Non-ASEAN	1,801.56	620.60	2,071.83	3,414.31
	Total Sales to India	1,292	2,910	3,882	
July	From ASEAN	0.00	500.00	299.99	
	From Non-ASEAN	799.01	2915.39	2,697.41	
	Total Sales to India	1,982	2,715	3,607	
August	From ASEAN	0.00	500.00	300.01	
	From Non-ASEAN	0.00	492.27	2,779.72	
	Total Sales to India	1,452	1,122	3,575	
September	From ASEAN	0.00	500.00	2,399.97	
	From Non-ASEAN	498.73	492.66	2,598.77	
	Total Sales to India	1,772	542	3,719	
October	From ASEAN	0.00	300.01	300.00	
	From Non-ASEAN	1,703.09	1,497.75	1,921.49	
	Total Sales to India	2,069	1,038	3,891	
November	From ASEAN	500.00	0.00	649.99	
	From Non-ASEAN	1,774.78	520.79	4,553.87	
	Total Sales to India	2,768	2,430	3,736	
December	From ASEAN	499.99	500.01	0.00	
	From Non-ASEAN	2,694.23	1,998.54	1,621.34	
	Total Sales to India	3,665	2,877	4,083	
Total Quantity of Import of Copper Cathode	From ASEAN	5,499.97	10,100.11	8,749.95	8,982.93
	From Non-ASEAN	16,103.44	23,097.17	26,425.33	18,265.76
	Total Sales to India	24,075.15	29,101.22	43,256.03	23,533.61

TABLE-2

Hailiang Vietnam - Monthly data analysis of purchase and sales of Copper Cathode (Quantity in MT)

		2019	2020	2021	2022	2023 (Till July 2023)
Jan	From ASEAN	-	-	-	-	
	From Non-ASEAN	2,918	2,488	4,503	3,381	3,656
	Total Salesto India	3158	2816	3484	3460	3721
Feb	From ASEAN	-	3,297	2,074	203	2,800
	From Non-ASEAN	4,031	7,070	6,243	2,265	3,962
	Total Salesto India	2733	2730	2756	2225	4156
March	From ASEAN	2,000	2,090	1,480	1,505	1,224
	From Non-ASEAN	6,594	7,628	6,331	4,126	5,696
	Total Salesto India	2158	2149	3361	2573	4084
April	From ASEAN	1,000	2,004	686	703	3,685
	From Non-ASEAN	6,203	5,098	3,348	4,176	2,536
	Total Salesto India	2655	271	1642	2316	3277
May	From ASEAN	1,000	896	-	905	500
	From Non-ASEAN	3,714	8,910	2,256	3,539	5,146
	Total Sales	1604	37	343	2213	1820
June	From ASEAN	1,000	896	300	1,711	-
	From Non-ASEAN	2,316	1,990	997	3,961	2,852
	Total Salesto India	1733	227	339	3685	1493
July	From ASEAN	1,500	2,288	800	1,303	-
	From Non-ASEAN	4,397	1,869	2,048	4,132	3,116
	Total Salesto India	1260	434	360	2502	0
August	From ASEAN	-	4,259	-	1,203	
	From Non-ASEAN	4,715	5,512	4,415	4,471	
	Total Salesto India	1190	705	419	1772	
Septembe r	From ASEAN	2,900	800	-	1,603	
	From Non-ASEAN	4,098	5,803	3,016	1,555	
	Total Salesto India	1697	856	89	2161	
October	From ASEAN	400	80	800	783	
	From Non-ASEAN	2,309	2,224	3,931	2,003	
	Total Salesto India	1770	1553	121	2183	
November	From ASEAN	494	1,263	500	502	
	From Non-ASEAN	2,605	500	3,854	7,599	
	Total Salesto India	2383	2466	1794	3395	
December	From ASEAN	1,296	396	700	1,702	
	From Non-ASEAN	3,306	3,166	4,146	7,368	
	Total Salesto India	2975	3340	3435	3449	
Total Quantity of Import of Copper Cathode	From ASEAN	11,590	19,964	8,036	12,726	8,279
	From Non-ASEAN	47,206	52,258	45,088	48,577	26,964
	Total salesto India	25316	17584	18143	31935	18553

6.2.1 As can be seen from the above Tables 1 and 2, there are exports to India, despite there being no procurement of the ASEAN Copper Cathodes as Raw Material by the Exporters during those months or very miniscule ASEAN Content and very high Non-ASEAN Imports. The Non-Purchase of ASEAN-origin Copper Cathodes as Raw Material during many months shown in TABLE -1 and TABLE 2 above demolishes, their hypothesis that whole of the Copper Tubes and Pipes exported to India were manufactured out of the ASEAN Copper Cathodes, as despite there being Nil or Negligible ASEAN Copper Cathode Procurements, Huge Copper Tubes and Pipes have been exported to India, during those months, from the raw material procured from the Non-ASEAN Countries. For example, in the year 2020, in six months, out of the twelve months, there was no procurement from the ASEAN Countries, despite that huge quantities were exported during that period, which means, those sales were not conforming to AIFTA Rules of Origin, hence they would not be eligible for the Preferential Treatment and Exemption Notification.

6.2.2 This substantiates the fact that the actual ASEAN content in copper pipes and tubes exported to India does not meet the RVC requirements and there is potential misrepresentation in their Certificates of Origin (COOs). The exported copper cathodes are derived from non-ASEAN sources or fail to meet the stipulated RVC requirements, and it has ***Constituted a Breach of India-ASEAN trade agreement***, which is designed to promote fair and equitable trade within the region. By exporting products that do not genuinely qualify as ASEAN-origin, the exporters had attempted to take undue advantage of tariff concessions or other benefits. This not only distorts competition but also jeopardizes the integrity of regional trade policies. Consequently, any Certificate of Origin (COO) asserting an RVC above 35% is factually incorrect and should be deemed invalid.

6.3.1 It is also noticed that suppliers based in Vietnam are exporting to India and many other countries in the world or would be catering to domestic demands. Importer and Suppliers Representatives have contended that the Copper Cathodes procured from the ASEAN Countries has been used in the manufacture of Copper Tubes and Pipes and most of which have been exported to India only. This contention is not borne out of the Facts or Data or any Records maintained by them, as nothing of that sort has been submitted during the Investigation, or recorded by them in the Annual Financial Statements or Balance Sheets, Purchase, Sale or Shipping Documents, which can validate the claims made by them.

6.3.2 Further, a prudent manufacturer would have First in First Use Raw Material utilization method, coupled with Economic Order Quantity and just in time processes in place to compete in the International Market Place. As party has failed to demonstrate any proof which substantiates their contentions, it has been assumed that Raw Copper Cathodes are used to manufacture Copper Tubes and Pipes and same are sold to buyers, as and when orders are received. These Copper Tubes and Pipes do not carry any label, whether they are manufactured for India or any other Country.

6.3.3 Therefore, the finished products manufactured in a time period have to be viewed for the applicability of the AIFTA Origin Rules. Exporters are maintaining their Financial Records, Calendar Year wise, hence a calendar year has been taken a period, to ascertain whether Regional Value Content (RVC) has been met or has not been met, during the period as in the absence of the lack of records maintained by the Exporter, each Sales Invoice cannot be examined, though Certificates have been submitted with each consignment, but which are factually incorrect as demonstrated through the Tables 1 and 2.

6.3.4 Moreover, there is no documented mechanism to substantiate that the percentage of ASEAN-origin copper used in manufacturing corresponds to the claim made in the Country of Origin certificate. This absence of proper production process and traceability raises concerns about the accuracy of the origin declaration and prevents compliance with the Regional Value Content (RVC) requirements under the ASEAN-India Free Trade Agreement (AIFTA). Due to the lack of segregation of originating and non-originating materials used in exports to India, it is impossible to verify whether the copper cathodes used in the production process meets the AIFTA's rules of origin criteria. Without proper segregation of originating and non-originating materials, the final product does not satisfy the RVC requirements, which mandate that a specified percentage of the goods' value must originate from ASEAN to avail preferential tariff treatment. Consequently, the goods in question do not qualify for preferential treatment under the agreement, leading to the imposition of standard import duties instead of the reduced rates offered under AIFTA.

6.4 While suppliers i.e M/s. Jintian Copper Industrial (Vietnam) Company Ltd and & M/s. Hailiang (Vietnam) Copper Manufacturing Co. Ltd asserts that is not required to examine records regarding copper cathode originating in ASEAN and non-ASEAN countries for the total production of copper pipes and tubes, it is important to consider the specific provisions under Indian Customs regulations, especially those concerning the implementation of the India-ASEAN Free Trade Agreement (AIFTA).

6.4.1 Under the **Notification No. 189/2009-Customs (N.T.) dated 31.12.2009**, and the rules framed thereunder, the Indian Customs Authority is indeed required to scrutinize whether the goods meet the eligibility criteria for preferential duty rates under the AIFTA. This includes a clear requirement for verifying the origin of the goods whether they are from an ASEAN member country or not.

6.4.2 For copper cathodes, which are a raw material used in the production of copper pipes and tubes, authorities must examine the origin of the copper cathodes as part of the investigation to determine if the final product i.e Copper pipes and tubes qualify for preferential treatment under Rule 5 of India-ASEAN Free Trade Agreement (AIFTA).

6.4.3 Therefore, it is not correct to state that Indian Customs is not required to examine records regarding the origin of copper cathodes in respect of total production of suppliers. In fact, the

examination of such records is a critical step in determining whether the final copper pipes and tubes qualify for preferential duty treatment under the AIFTA. This examination is in line with the rules and regulations set forth under the Indian Customs Act, 1962, and the relevant notifications and provisions pertaining to the India-ASEAN FTA.

6.4.4 Further, exporters have raised the concern that FOB value of the total sales made by them cannot be ascertained, hence RVC cannot be calculated. This assertion is factually incorrect as FOB is taken as given by the exporters and all other details as given in their replies and documents. FOB of the Total Sales is nothing but value of the sales during the period plus cost of transporting the same from the place of sale to the Port and putting it on the vessel. This value is available with the Supplier or Exporter only, therefore it has been taken as given by them.

6.5 From the above, it appears that Copper Tubes and Pipes imported into India from Vietnamese suppliers M/s. Jintian Copper Industrial (Vietnam) Company Ltd. & M/s. Hailiang(Vietnam) Copper Manufacturing Co. Ltd. in the years 2020 & 2021 and 2019, 2020, 2021, 2022 & 2023 respectively were not eligible for duty exemption as granted vide ASEAN FTA Notification No. 46/2011 dated 01.06.2011. Under the scheme of self-assessment, onus is on the Importer to make true and correct declaration in all aspects. In the instant case, importer has made wrong declaration in FORM 1 of CAROTAR, 2020 as required under Section 28 DA of the Customs Act, 1962 by declaring the imported goods of Indonesian Origin/ Complying AIFTA Value Content to avail undue benefits of duty exemption given under AIFTA.

Legal Provisions:

The relevant legal provisions in this regard are as under:

12.1 Section 2(39) of the Customs Act. 1962:

(39) "smuggling", in relation to any goods, means any act or omission which will render such goods liable to confiscation under section 111 or section 113;

12.1 Section 17. Assessment of duty.:

(1) An importer entering any imported goods under section 46 , or an exporter entering any export goods under section 50 , shall, save as otherwise provided in section 85 , self-assess the duty, if any, leviable on such goods.

(2) The proper officer may verify the 2 [the entries made under section 46 or section 50 and the self assessment of goods referred to in sub-section (1)] and for this purpose, examine or test any imported goods or export goods or such part thereof as may be necessary.

3 [Provided that the selection of cases for verification shall primarily be on the basis of risk evaluation through appropriate selection criteria.]

4 [(3) For 5 [the purposes of verification] under sub-section (2), the proper officer may require the importer, exporter or any other person to produce any document or information, whereby the duty leviable on the imported goods or export goods, as the case may be, can be ascertained and thereupon, the importer, exporter or such other person shall produce such document or furnish such information.]

(4) Where it is found on verification, examination or testing of the goods or otherwise that the self- assessment is not done correctly, the proper officer may, without prejudice to any other action which may be taken under this Act, re-assess the duty leviable on such goods.

*(5) Where any re-assessment done under sub-section (4) is contrary to the self-assessment done by the importer or exporter 6 [***] and in cases other than those where the importer or exporter, as the case may be, confirms his acceptance of the said re- assessment in writing, the proper officer shall pass a speaking order on the re-assessment, within fifteen days from the date of re-assessment of the bill of entry or the shipping bill, as the case may be.*

Section 28DA of the Customs Act, 1962 reads as-

Procedure regarding claim of preferential rate of duty: -

(1) An importer making claim for preferential rate of duty, in terms of any trade agreement, shall
(i) make a declaration that goods qualify as originating goods for preferential rate of duty under such agreement;
(ii) possess sufficient information as regards the manner in which country of origin criteria, including the regional value content and product specific criteria, specified in the rules of origin in the trade agreement, are satisfied;
(iii) furnish such information in such manner as may be provided by rules;
(iv) exercise reasonable care as to the accuracy and truthfulness of the information furnished.

Section 46. Entry of goods on importation. -

(1) The importer of any goods, other than goods intended for transit or transshipment, shall make entry thereof by presenting 1 [electronically] 2 [on the customs automated system] to the proper officer a bill of entry for home consumption or warehousing 3 [in such form and manner as may be prescribed] :

4 [Provided that the 5 [Principal Commissioner of Customs or Commissioner of Customs] may, in cases where it is not feasible to make entry by presenting electronically 6 [on the customs automated system] , allow an entry to be presented in any other manner:

Provided further that if the importer makes and subscribes to a declaration before the proper officer, to the effect that he is unable for want of full information to furnish all the particulars of the goods required under this sub-section, the proper officer may, pending the production of such information, permit him, previous to the entry thereof (a) to examine the goods in the presence of an officer of customs, or (b) to deposit the goods in a public warehouse appointed under section 57 without warehousing the same.

(2) Save as otherwise permitted by the proper officer, a bill of entry shall include all the goods mentioned in the bill of lading or other receipt given by the carrier to the consignor.

7 [(3) The importer shall present the bill of entry under sub-section (1) 8 [before the end of the day (including holidays) preceding the day] on which the aircraft or vessel or vehicle carrying the goods arrives at a customs station at which such goods are to be cleared for home consumption or warehousing:

9 [Provided that the Board may, in such cases as it may deem fit, prescribe different time limits for presentation of the bill of entry, which shall not be later than the end of the day of such arrival:

Provided further that] a bill of entry may be presented 10 [at any time not exceeding thirty days prior to] the expected arrival of the aircraft or vessel or vehicle by which the goods have been shipped for importation into India:

11 [Provided also that] where the bill of entry is not presented within the time so specified and the proper officer is satisfied that there was no sufficient cause for such delay, the importer shall pay such charges for late presentation of the bill of entry as may be prescribed.

(4) The importer while presenting a bill of entry shall 12 [* *] make and subscribe to a declaration as to the truth of the contents of such bill of entry and shall, in support of such declaration, produce to the proper officer the invoice, if any, 13 [and such other documents relating to the imported goods as may be prescribed].*

14 [(4A) The importer who presents a bill of entry shall ensure the following, namely:-

(a) the accuracy and completeness of the information given therein;

(b) the authenticity and validity of any document supporting it; and

(c) compliance with the restriction or prohibition, if any, relating to the goods under this Act or under any other law for the time being in force.]

(5) If the proper officer is satisfied that the interests of revenue are not prejudicially affected and that there was no fraudulent intention, he may permit substitution of a bill of entry for home consumption for a bill of entry for warehousing or vice versa.

Section 110AA titled "Action subsequent to inquiry, investigation or audit or any other specified purpose

Where in pursuance of any proceeding, in accordance with Chapter XIII or this Chapter, if an officer of customs has reasons to believe that—

- (a) any duty has been short-levied, not levied, short-paid or not paid in a case where assessment has already been made;*
 - (b) any duty has been erroneously refunded;*
 - (c) any drawback has been erroneously allowed; or*
 - (d) any interest has been short-levied, not levied, short-paid or not paid, or erroneously refunded,*
- then such officer of customs shall, after causing inquiry, investigation, or as the case may be, audit, transfer the relevant documents, along with a report in writing—*
- (i) to the proper officer having jurisdiction, as assigned under section 5 in respect of assessment of such duty, or to the officer who allowed such refund or drawback; or*
 - (ii) in case of multiple jurisdictions, to an officer of customs to whom such matter is assigned by the Board, in exercise of the powers conferred under section 5,*
- and thereupon, power exercisable under sections 28, 28AAA or Chapter X, shall be exercised by such proper officer or by an officer to whom the proper officer is subordinate in accordance with sub-section (2) of section 5.*

Section 111. Confiscation of improperly imported goods, etc. -

The following goods brought from a place outside India shall be liable to confiscation: -

- (a) any goods imported by sea or air which are unloaded or attempted to be unloaded at any place other than a customs port or customs airport appointed under clause (a) of section 7 for the unloading of such goods;*
- (b) any goods imported by land or inland water through any route other than a route specified in a notification issued under clause (c) of section 7 for the import of such goods;*
- (c) any dutiable or prohibited goods brought into any bay, gulf, creek or tidal river for the purpose of being landed at a place other than a customs port;*
- (d) any goods which are imported or attempted to be imported or are brought within the Indian customs waters for the purpose of being imported, contrary to any prohibition imposed by or under this Act or any other law for the time being in force;*
- (e) any dutiable or prohibited goods found concealed in any manner in any conveyance;*
- (f) any dutiable or prohibited goods required to be mentioned under the regulations in an 1 [arrival manifest or import manifest] or import report which are not so mentioned;*
- (g) any dutiable or prohibited goods which are unloaded from a conveyance in contravention of the provisions of section 32 , other than goods inadvertently unloaded but included in the record kept under sub-section (2) of section 45 ;*
- (h) any dutiable or prohibited goods unloaded or attempted to be unloaded in contravention of the provisions of section 33 or section 34 ;*
- (i) any dutiable or prohibited goods found concealed in any manner in any package either before or after the unloading thereof;*
- (j) any dutiable or prohibited goods removed or attempted to be removed from a customs area or a warehouse without the permission of the proper officer or contrary to the terms of such permission;*
- (k) any dutiable or prohibited goods imported by land in respect of which the order permitting clearance of the goods required to be produced under section 109 is not produced or which do not correspond in any material particular with the specification contained therein;*
- (l) any dutiable or prohibited goods which are not included or are in excess of those included in the entry made under this Act, or in the case of baggage in the declaration made under section 77 ;*
- (m) 2 [any goods which do not correspond in respect of value or in any other particular] with the entry made under this Act or in the case of baggage with the declaration made under section 77 3 [in respect thereof, or in the case of goods under trans-shipment, with the declaration for trans-shipment referred to in the proviso to sub-section (1) of section 54];*
- (n) any dutiable or prohibited goods transitted with or without trans-shipment or attempted to be so transitted in contravention of the provisions of Chapter VIII;*
- (o) any goods exempted, subject to any condition, from duty or any prohibition in respect of the import thereof under this Act or any other law for the time being in force, in respect of which the condition is not observed unless the non-observance of the condition was sanctioned by the proper officer;*
- 4 [(p) any notified goods in relation to which any provisions of Chapter IVA or of any rule made under this Act for carrying out the purposes of that Chapter have been contravened.]*

5 [(q) any goods imported on a claim of preferential rate of duty which contravenes any provision of Chapter VAA or any rule made thereunder.]

SECTION 112. Penalty for improper importation of goods, etc.-

Any person, -

(a) who, in relation to any goods, does or omits to do any act which act or omission would render such goods liable to confiscation under section 111 , or abets the doing or omission of such an act, or

(b) who acquires possession of or is in any way concerned in carrying, removing, depositing, harbouring, keeping, concealing, selling or purchasing, or in any other manner dealing with any goods which he knows or has reason to believe are liable to confiscation under section 111 ,

shall be liable, -

(i) in the case of goods in respect of which any prohibition is in force under this Act or any other law for the time being in force, to a penalty 1 [not exceeding the value of the goods or five thousand rupees], whichever is the greater;

2 [(ii) in the case of dutiable goods, other than prohibited goods, subject to the provisions of section 114A , to a penalty not exceeding ten per cent. of the duty sought to be evaded or five thousand rupees, whichever is higher :

Provided that where such duty as determined under sub-section (8) of section 28 and the interest payable thereon under section 28AA is paid within thirty days from the date of communication of the order of the proper officer determining such duty, the amount of penalty liable to be paid by such person under this section shall be twenty-five per cent. of the penalty so determined;]

3 [(iii) in the case of goods in respect of which the value stated in the entry made under this Act or in the case of baggage, in the declaration made under section 77 (in either case hereafter in this section referred to as the declared value) is higher than the value thereof, to a penalty 4 [not exceeding the difference between the declared value and the value thereof or five thousand rupees], whichever is the greater;]

(iv) in the case of goods falling both under clauses (i) and (iii), to a penalty 5 [not exceeding the value of the goods or the difference between the declared value and the value thereof or five thousand rupees], whichever is the highest;

(v) in the case of goods falling both under clauses (ii) and (iii), to a penalty 6 [not exceeding the duty sought to be evaded on such goods or the difference between the declared value and the value thereof or five thousand rupees], whichever is the highest.]

Section 114A. Penalty for short-levy or non-levy of duty in certain cases. –

*Where the duty has not been levied or has been short-levied or the interest has not been charged or paid or has 2 [****]been part paid or the duty or interest has been erroneously refunded by reason of collusion or any wilful mis-statement or suppression of facts, the person who is liable to pay the duty or interest, as the case may be, as determined under 3 [sub-section (8) of section 28] shall also be liable to pay a penalty equal to the duty or interest so determined:*

4 [Provided that where such duty or interest, as the case may be, as determined under 3 [sub-section (8) of section 28], and the interest payable thereon under section 5 [28AA], is paid within thirty days from the date of the communication of the order of the proper officer determining such duty, the amount of penalty liable to be paid by such person under this section shall be twenty-five per cent of the duty or interest, as the case may be, so determined:

Provided further that the benefit of reduced penalty under the first proviso shall be available subject to the condition that the amount of penalty so determined has also been paid within the period of thirty days referred to in that proviso :

Provided also that where the duty or interest determined to be payable is reduced or increased by the Commissioner (Appeals), the Appellate Tribunal or, as the case may be, the court, then, for the purposes of this section, the duty or interest as reduced or increased, as the case may be, shall be taken into account:

Provided also that in case where the duty or interest determined to be payable is increased by the Commissioner (Appeals), the Appellate Tribunal or, as the case may be, the court, then, the benefit of reduced penalty under the first proviso shall be available if the amount of the duty or the interest so increased, along with the interest payable thereon under section 5 [28AA], and twenty-five percent of the consequential increase in penalty have also been paid within thirty days of the communication of the order by which such increase in the duty or interest takes effect :

Provided also that where any penalty has been levied under this section, no penalty shall be levied under section 112 or section 114 .

Explanation . - For the removal of doubts, it is hereby declared that -

(i) the provisions of this section shall also apply to cases in which the order determining the duty or interest 3 [sub-section (8) of section 28] relates to notices issued prior to the date on which the Finance Act, 2000 receives the assent of the President;*

(ii) any amount paid to the credit of the Central Government prior to the date of communication of the order referred to in the first proviso or the fourth proviso shall be adjusted against the total amount due from such person.]

Section 114AA. Penalty for use of false and incorrect material. -

If a person knowingly or intentionally makes, signs or uses, or causes to be made, signed or used, any declaration, statement or document which is false or incorrect in any material particular, in the transaction of any business for the purposes of this Act, shall be liable to a penalty not exceeding five times the value of goods.

6.2 Foreign Trade (Regulation) Rules, 1993

Rule 14: *“Prohibition regarding making, signing of any declaration, statement or documents: - No person shall make, sign or use or cause to be made, signed or used any declaration, statement or document for the purposes of obtaining a license or importing any goods knowing or having reason to believe that such declaration, statement or document is false in any material particular.*

(2) No person shall employ any corrupt or fraudulent practice for the purposes of obtaining any licence or importing or exporting any goods”

7. Whereas, consequent upon amendment to Section 17 of the Customs Act, 1962 vide Finance Act, 2011, 'Self-assessment' has been introduced in customs clearance. The Circular No. 17/2011 dated 08.04.2011 provides for self-assessment of duty on imported goods by the Importer himself by filing a bill of entry, in the electronic form. Section 46 of the Customs Act, 1962 makes it mandatory for the Importer to make entry for the imported goods by presenting a bill of entry electronically to the proper officer. As per Regulation 4 of the Bill of Entry (Electronic Declaration) Regulation, 2011 (issued under Section 157 read with Section 46 of the Customs Act, 1962), the bill of entry shall be deemed to have been filed and self-assessment of duty completed when, after entry of the electronic declaration (which is defined as particulars relating to the imported goods that are entered in the Indian Customs Electronic Data Interchange System) either through ICEGATE or by way of data entry through the service center, a bill of entry number is generated by the Indian Customs Electronic Data Interchange System for the said declaration. Thus, under self-assessment, Importer has to ensure correct declaration of classification, applicable rate of duty, value, benefit of exemption notifications claimed, if any, in respect of the imported goods while presenting the bill of entry. It is the added and enhanced responsibility of the Importer to declare correct description, value, notification, etc. and to correctly classify the goods, determine and pay the duty applicable in respect of the imported goods.

8. It appears that the importer had, with deliberate intent, made wrong declaration in FORM 1 of CAROTAR, 2020 as required under Section 28 DA of the Customs Act, 1962. They mis-declared the imported goods to of ASEAN Origin/Complying AIFTA Value Content to avail undue benefits of duty exemption given under AIFTA and short-paid the customs duty. They failed to declare before the Customs authorities that their imported goods were not complying with the Origin Criteria as prescribed under Customs Notification No 189/2009 (NT) dated

31.12.2009, though this fact appear well known to them right from the stage of placing order and manufacturing of the same as per their design/requirements by the overseas supplier. This act clearly shows willful mis-declaration and suppression of fact on their part.

8.1 By wrong declarations in the FORM 1 of CAROTAR, 2020 in respect of the imported goods, the importer has contravened the provisions of Section 46 of the Customs Act, 1962 in as much as they had not disclosed the correct declaration in respect of the imported goods before the customs authorities.

9. Whereas, it appears that the importer has deliberately not paid the duty by resorting to willful mis-statement and incorrect declaration in respect of the imported goods. As per the provisions of Section 46 of the Customs Act, 1962, the importer had to file Bill of Entry making and subscribing to a declaration as to the truthfulness of the contents of such Bill of Entry. It appears that the importer had subscribed to false declarations and had deliberately submitted incorrect declaration about ASEAN Origin/Complying AIFTA Value Content in respect of the imported goods. By these acts and omissions, the importer appear to have contravened the provisions of Section 46 of the Customs Act, 1962 and Section 11 of the Foreign Trade (Development and Regulation) Act, 1992 read with Rules 14 of the Foreign Trade (Regulation) Rules 1993, in as much as they had not submitted the correct Origin of the imported goods before the Customs authorities while filing the Bills of Entry at the time of the importation of the goods. The same appear to have been done to evade payment of applicable Basic Customs Duty leviable thereon under Section 12 of the Customs Act, 1962, at the rates specified in the first Schedule to the Customs Tariff Act, 1975. This has also resulted in short-payment of other Customs levies viz. Social Welfare Surcharge and IGST as BCD forms part of assessable value for computation of these duties. This act of mis-classification of the imported goods has rendered the goods liable to confiscation as per the provisions of Section 111 (q) of the Customs Act, 1962. The differential duty amounting to **Rs. 2,28,24,275/- (Rupees Two Crores Twenty Eight Lakh Twenty Four Thousand Two Hundred And Seventy Five Only)**, so not paid, appear liable for recovery from the Importer under Section 28 (4) of the Customs Act, 1962, along with applicable interest at the applicable rate under section 28AA of the Customs Act, 1962.

10. It further appears that for the acts of omission and commissions as mentioned above, the importer has rendered themselves liable for penal action under section 112(a) (ii), 114A and 114AA of the Customs Act. 1962.

10.1 Also, vide Notification No.28/2022-Customs (N.T.) dated the 31.03.2022, in a case of multiple jurisdictions as referred in section 110AA in respect of *any duty has been short-levied, not levied, short-paid or not paid in a case where assessment has already been made;* the report in writing, after causing the inquiry, investigation or audit as the case may be, along with the relevant documents, shall be transferred, in a case of multiple jurisdictions in respect of *involving aggregate duty without limit*, to Principal Commissioner of Customs or Commissioner of Customs for the purpose of exercise of powers under sections 28, section 28AAA or Chapter X of the said Act, as the case may be. It is seen that importer is importing copper pipes and tubes

from various ports which are as detailed below and the total differential duty is highest at port INSBI6, i.e ICD Khodiyar under the jurisdiction of The Principal Commissioner of Customs, Customs Commissionerate, Ahmedabad.

S.No.	Customs Site	Total Differential Duty Amount
1	INSBI6	21535916.78
2	INSAU6	1288358.623
	Total	22824275.41

11. Now therefore, **M/s. AKSHAY IMPEX [IEC No.- 813027233],situated at B-10 VASU PUJYA CHAMBER, NR.INCOME, TAX CIRCLE, ASHRAM ROAD, Contact No: 9824543535 , AHMEDABAD , AHMEDABAD , GUJARAT, 380014** are hereby called upon to show cause to The Principal Commissioner of Customs, Customs Commissionerate Ahmedabad,1st Floor, Custom House, Near All India Radio, Income Tax Circle, Navrangpura, Ahmedabad-380009 within 30 days of the receipt of this notice as to why:

- (i) The declaration in the FORM 1 of CAROTAR, 2020in respect of the goods imported under Bs/E as per attached annexure-A, should not be held incorrect and the claim of preferential rate of duty on imported goods be not disallowed.
- (ii) The provisional assessments under Bills of Entries should not be finalized in accordance with the provisions of Section 18 of the Customs Act, 1962 and Bank Guarantees given for the same should not be appropriated.
- (iii)Differential Duty amounting to **Rs. 2,28,24,275/- (Rupees Two Crores Twenty Eight Lakh Twenty Four Thousand Two Hundred And Seventy Five Only)**,on the goods imported vide Bs/E as per attached annexure-A should not be demanded under Section 28(4) of the Custom Act, 1962 alongwith applicable interest under section 28AA of the Customs Act. 1962.
- (iv)The goods imported vide Bs/E as per attached Annexure-A having assessable value of **Rs. 18,21,33,095/- (Rupees Eighteen Crores Twenty One Lakhs Thirty Three Thousand And Ninety Five Only)** should not be confiscated under Section 111(q) of the Customs Act, 1962.
- (v) Penalty should not be imposed on them under Section 112(a) (ii) of the Customs Act. 1962 for their acts of omission and commission, in rendering the goods liable for confiscation, as stated above.
- (vi)Penalty should not be imposed on them under Section 114A and Section 114AA of Customs Act, 1962.

12. The Importer, **M/s. AKSHAY IMPEX** are hereby informed that they may avail the benefit of reduced penalty @15% of the duty so specified in this notice in terms of Section 28(5) of the Customs Act, 1962 by payment of duty and interest within 30 days of the receipt of this notice, failing which Importer may be subject to higher penalty equal to the duty and interest so determined.

13. The written explanation/reply should be filed by the importer before The Principal Commissioner of Customs, Customs Commissionerate Ahmedabad, 1st Floor, Custom House, Near All India Radio, Income Tax Circle, Navrangpura, Ahmedabad-380009 within 30 days from the date of this notice. They are further required to intimate in their written reply whether they wish to be heard in person before the case is adjudicated.

14. If no cause is shown against the action proposed to be taken or the importer does not appear before the adjudicating authority when the case is posted for hearing, the case will be decided ex-parte on merits.

15. The department reserves its right to amend, modify or supplement this notice at any point of time prior to the adjudication of the case.

16. This present show cause notice is limited to the matter of short payment of duty for the goods imported vide Bs/E as per attached annexure-A and without prejudice to any other action that may be taken against the importer or any other firm(s) or person(s) under the provisions of the Customs Act, 1962 or any other law for the time being in force in the Union of India.

(Shiv Kumar Sharma)
Principal Commissioner,
Customs, Ahmedabad

DIN-

F.No.VIII/

Date:

To,

**M/s.AKSHAY IMPEX, B-10 VASUPUJYA CHAMBER, NR.INCOME TAX
CIRCLE, ASHRAM ROAD, AHMEDABAD , GUJARAT, 380014.**

Copy to:

1. The Additional Commissioner, Special Intelligence & Investigation Branch (SIIB), Jodhpur (Preventive) Customs Preventive Commissionerate, Jodhpur, New Central Revenue Building, Statue Circle, C-Scheme, Jaipur - 302005 (Raj.)
2. The Deputy/Assistant Commissioner of Customs, ICD-Khodiyar
3. The Deputy/Assistant Commissioner of Customs, ICD-Sanand.
4. The Superintendent (Systems), Customs Hdqrs., Ahmedabad for uploading on official web-site.
5. Guard File.

[Relied upon documents]

- i) Letter dated 24.05.2023 addressed to all the importers. **[RUD1]**
- ii) Letter dated 05.07.2023 to all the Ports under the jurisdiction of this commissionerate. **[RUD2]**
- iii) Letter dated 09.08.2023 to M/s. Bombay Metal Exchange. **[RUD3]**
- iv) Letter dated 25.08.2023 from Lumiere Law Partners. **[RUD4]**
- v) Letter dated 12.09.2023 to Lumiere Law Partners. **[RUD5]**
- vi) Letter dated 22.09.2023 from Lumiere Law Partners. **[RUD6]**
- vii) Letter dated 25.10.2023 from Lumiere Law Partners. **[RUD7]**
- viii) Letter dated 10.11.2023 to Lumiere Law Partners. **[RUD8]**
- ix) Letter dated 04.12.2023 from Lumiere Law Partners. **[RUD9]**
- x) Letter dated 28.12.2023 from Lumiere Law Partners. **[RUD10]**
- xi) Letter dated 29.12.2023 to Shri Gagandeep Singh/Shri Sahil Dudeja (M/s. JinTian Copper Industrial Vietnam Company Ltd). **[RUD11]**
- xii) Email dated 31.01.2024 from Lumiere Law Partners. **[RUD12]**
- xiii) Letter dated 22.03.2024 from M/s. Surana Law Offices. **[RUD13]**
- xiv) Letter dated 18.04.2024 to representatives of M/s. JinTian Copper Industrial Vietnam Company Ltd. **[RUD14]**
- xv) Letter dated 20.06.2024 from M/s. Surana Law Offices. **[RUD15]**
- xvi) Summon dated 06.03.2025 to M/s. AKSHAY IMPEX **[RUD 16]**
- xvii) Importer's statement dated 25.03.2025. **[RUD17]**
- xviii) Annexure – A [Calculation Chart showing duties short paid]; and

[The documents not enclosed as the same are available with the Importer]

- i) Bills of Entry as detailed in the enclosed Annexure – A.