



ACCIAI  
SPECIALI  
TERNI

LETTER OF SUPPORT

Information concerning the Application for anti-circumvention investigation on imports of  
stainless steel hot rolled products originating in Turkey

1. Identity (name, address, telephone, fax) of the company supporting the application

Name: Acciai Speciali Terni S.p.A.

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The persons who should be contacted for this entity are set out in Annex 1. Please ensure that all such persons are copied on correspondence with this entity.

2. Hereby, the company stated in point 1 above supports the above as Applicant in the Application lodged by EUROFER and authorises EUROFER to act on its behalf in all matters concerning the above mentioned proceedings.

Date: 25/05/2022

Name and signature of authorised official

  
MARIO C.  
CALDONAZZO  
Chief Executive Officer

  
DIMITRI  
MENECAI  
Plant Director



**LETTER OF SUPPORT**

**Information concerning the Application for anti-circumvention investigation on imports of stainless steel hot rolled products originating in Turkey**

1. Identity (name, address, telephone, fax) of the company supporting the application

**Name:** Acerinox Europa SAU

**Address:** Avda. Acerinox Europa, s/n Poligono Industrial Palmones, 11379, Los Barrios  
Cadiz, Spain

**Address for Communications:** Calle Santiago de Compostela 100, 28035 Madrid, Spain

**Tel:**  
**Fax:** Confidential information (personal data)  
**E-Mail:**

The persons who should be contacted for this entity are set out in Annex 1. Please ensure that all such persons are copied on correspondence with this entity.

2. Hereby, the company stated in point 1 above supports the above as Applicant in the Application lodged by EUROFER and authorises EUROFER to act on its behalf in all matters concerning the above mentioned proceedings.

Signed in Madrid, 30<sup>th</sup> May 2022

  
  
**ACERINOX EUROPA, S.A.U.**  
Luis Gimeno Valledor  
Secretary General Acerinox SA



## **LETTER OF SUPPORT**

### **Information concerning the Application for anti-circumvention investigation on imports of stainless steel hot rolled products originating in Turkey**

1. Identity (name, address, telephone, fax) of the company supporting the application

Name: Aperam Stainless France

Address: 6 Rue André Campra  
93210 La Plaine Saint-Denis Cedex

Tel: +33 1 71920652

Fax: +33 1 71920798

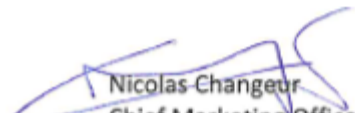
E-Mail: [stainless@aperam.com](mailto:stainless@aperam.com)

The persons who should be contacted for this entity are set out in Annex 1. Please ensure that all such persons are copied on correspondence with this entity.

2. Hereby, the company stated in point 1 above supports the above as Applicant in the Application lodged by EUROFER and authorises EUROFER to act on its behalf in all matters concerning the above mentioned proceedings.

Date: 25 May 2022

Name and signature of authorised official

  
Nicolas Changeur  
Chief Marketing Officer  
Aperam Stainless Europe



### **LETTER OF SUPPORT**

**Information concerning the Application for anti-circumvention investigation on imports of stainless steel hot rolled products originating in Turkey**

1. Identity (name, address, telephone) of the company supporting the application

Name: **Outokumpu Oyj**

Address: **Salmisaarenranta 11, 00180 Helsinki, Finland**

Tel: Confidential information (personal data)

E-Mail:

The persons who should be contacted for this entity are set out in Annex 1. Please ensure that all such persons are copied on correspondence with this entity.

2. Hereby, the company stated in point 1 above supports the above as Applicant in the Application lodged by EUROFER and authorises EUROFER to act on its behalf in all matters concerning the above mentioned proceedings.

Date: 23 May 2022

Name and signature of authorised official

Pia Aaltonen-Forsell – Chief Financial Officer

| EU27 Imports of SSHR<br>(in tonnes) | 2018       | 2019       | 2020        | 2021        |
|-------------------------------------|------------|------------|-------------|-------------|
| Imports from Turkey                 | 1.743      | 2.140      | 21.535      | 33.376      |
| <b>Index</b>                        | <b>100</b> | <b>123</b> | <b>1236</b> | <b>1915</b> |
| Imports from Indonesia              | 44.863     | 81.104     | 3.675       | 105.784     |
| <b>Index</b>                        | <b>100</b> | <b>181</b> | <b>8</b>    | <b>236</b>  |

| Imports of SSHR from Turkey<br>(in tonnes) | 2018      | 2019       | 2020       | 2021       |
|--|-----------|------------|------------|------------|
| Imports in EU27                            | 1.743     | 2.140      | 21.535     | 33.376     |
| Imports in Italy                           | 2         | 326        | 19.967     | 29.851     |
| <b>Italy share of EU27 imports</b>         | <b>0%</b> | <b>15%</b> | <b>93%</b> | <b>89%</b> |

| Italy Imports of SSHR<br>(in tonnes) | 2018       | 2019          | 2020             | 2021             |
|--------------------------------------|------------|---------------|------------------|------------------|
| Imports from Turkey                  | 2          | 326           | 19.967           | 29.851           |
| <b>Index</b>                         | <b>100</b> | <b>19.156</b> | <b>1.174.529</b> | <b>1.755.914</b> |
| Imports from Indonesia               | 44.489     | 80.061        | 3.041            | 104.181          |
| <b>Index</b>                         | <b>100</b> | <b>180</b>    | <b>7</b>         | <b>234</b>       |

| EU27 Import price of SSHR<br>(in EUR/ tonnes) | 2018       | 2019       | 2020       | 2021       |
|---|------------|------------|------------|------------|
| From Turkey                                   | 2.669      | 2.729      | 1.634      | 1.693      |
| <b>Index</b>                                  | <b>100</b> | <b>102</b> | <b>61</b>  | <b>63</b>  |
| From Indonesia                                | 1.688      | 1.616      | 1.680      | 1.822      |
| <b>Index</b>                                  | <b>100</b> | <b>96</b>  | <b>100</b> | <b>108</b> |



FLOW  
PARTNER

IMPORT  
Turkey

| REPORTER                                  | VALUE_IN_EUROS    | PRODUCT/PERIOD                      | Jan. 2022 | Feb. 2022 | Mar. 2022 | Apr. 2022 |
|---|-------------------|-------------------------------------|-----------|-----------|-----------|-----------|
| European Union - 27 countries (AT, BE, BG | VALUE_IN_EUROS    | Flat-rolled products of stainless s |           |           |           |           |
| European Union - 27 countries (AT, BE, BG | VALUE_IN_EUROS    | Flat-rolled products of stainless s | 23045     | 6687586   |           |           |
| European Union - 27 countries (AT, BE, BG | VALUE_IN_EUROS    | Flat-rolled products of stainless s |           | 11354593  |           |           |
| European Union - 27 countries (AT, BE, BG | VALUE_IN_EUROS    | Flat-rolled products of stainless s |           | 2443966   |           |           |
| European Union - 27 countries (AT, BE, BG | VALUE_IN_EUROS    | Flat-rolled products of stainless s | 1223180   | 1131895   |           |           |
| European Union - 27 countries (AT, BE, BG | VALUE_IN_EUROS    | Flat-rolled products of stainless s | 398724    | 484500    |           |           |
| European Union - 27 countries (AT, BE, BG | VALUE_IN_EUROS    | Flat-rolled products of stainless s | 118       | 3955      |           |           |
| European Union - 27 countries (AT, BE, BG | VALUE_IN_EUROS    | Flat-rolled products of stainless s | 2274      |           |           |           |
| European Union - 27 countries (AT, BE, BG | VALUE_IN_EUROS    | Flat-rolled products of stainless s | 13195     | 29627     |           |           |
| European Union - 27 countries (AT, BE, BG | QUANTITY_IN_100KG | Flat-rolled products of stainless s |           |           |           |           |
| European Union - 27 countries (AT, BE, BG | QUANTITY_IN_100KG | Flat-rolled products of stainless s | 60,50     | 40672,11  |           |           |
| European Union - 27 countries (AT, BE, BG | QUANTITY_IN_100KG | Flat-rolled products of stainless s |           | 69100,35  |           |           |
| European Union - 27 countries (AT, BE, BG | QUANTITY_IN_100KG | Flat-rolled products of stainless s |           | 14943,80  |           |           |
| European Union - 27 countries (AT, BE, BG | QUANTITY_IN_100KG | Flat-rolled products of stainless s | 3582,47   | 3151,30   |           |           |
| European Union - 27 countries (AT, BE, BG | QUANTITY_IN_100KG | Flat-rolled products of stainless s | 1214,53   | 1495,67   |           |           |
| European Union - 27 countries (AT, BE, BG | QUANTITY_IN_100KG | Flat-rolled products of stainless s | 0,99      | 8,31      |           |           |
| European Union - 27 countries (AT, BE, BG | QUANTITY_IN_100KG | Flat-rolled products of stainless s | 7,60      |           |           |           |
| European Union - 27 countries (AT, BE, BG | QUANTITY_IN_100KG | Flat-rolled products of stainless s | 12,62     | 223,78    |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | VALUE_IN_EUROS    | Flat-rolled products of stainless s |           |           |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | VALUE_IN_EUROS    | Flat-rolled products of stainless s |           | 6687586   |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | VALUE_IN_EUROS    | Flat-rolled products of stainless s |           | 11336381  |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | VALUE_IN_EUROS    | Flat-rolled products of stainless s |           | 2443966   |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | VALUE_IN_EUROS    | Flat-rolled products of stainless s |           | 104722    |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | VALUE_IN_EUROS    | Flat-rolled products of stainless s |           |           |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | VALUE_IN_EUROS    | Flat-rolled products of stainless s |           |           |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | VALUE_IN_EUROS    | Flat-rolled products of stainless s | 1860      |           |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | VALUE_IN_EUROS    | Flat-rolled products of stainless s |           |           |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | QUANTITY_IN_100KG | Flat-rolled products of stainless s |           |           |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | QUANTITY_IN_100KG | Flat-rolled products of stainless s |           | 40672,11  |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | QUANTITY_IN_100KG | Flat-rolled products of stainless s |           | 69043,10  |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | QUANTITY_IN_100KG | Flat-rolled products of stainless s |           | 14943,80  |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | QUANTITY_IN_100KG | Flat-rolled products of stainless s |           | 266,47    |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | QUANTITY_IN_100KG | Flat-rolled products of stainless s |           |           |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | QUANTITY_IN_100KG | Flat-rolled products of stainless s |           |           |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | QUANTITY_IN_100KG | Flat-rolled products of stainless s | 3,00      |           |           |           |
| Italy (incl. San Marino 'SM' -> 1993)     | QUANTITY_IN_100KG | Flat-rolled products of stainless s |           |           |           |           |

|       |                    | Jan. 2022 | Feb. 2022  | Mar. 2022 | Apr. 2022 |
|-------|--------------------|-----------|------------|-----------|-----------|
| EU27  | QUANTITY_IN_TONNES | 488       | 12.960     | -         | -         |
|       | VALUE_IN_EUROS     | 1.660.536 | 22.136.122 | -         | -         |
|       | EUR/ tonne         | 3.404     | 1.708      | -         | -         |
| Italy | QUANTITY_IN_TONNES | 0         | 12.493     | -         | -         |
|       | VALUE_IN_EUROS     | 1.860     | 20.572.655 | -         | -         |
|       | EUR/ tonne         | 6.200     | 1.647      | -         | -         |

FLOW IMPORT  
 PARTNER Turkey  
 REPORTER European Union - 27 countries (AT, BE, BG, CY, CZ, DE, DK, EE, ES, FI, FR, GR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK)

| QUANTITY_IN_100KG | PRODUCT/PERIOD  | Jan.-Dec. 2018 | Jan.-Dec. 2019 | Jan.-Dec. 2020 | Jan.-Dec. 2021 |
|-------------------|---|----------------|----------------|----------------|----------------|
| QUANTITY_IN_100KG | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further | 168,85         | 757,06         | 63877,61       | 87350,14       |
| QUANTITY_IN_100KG | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further | 289,68         | 1048,00        | 100619,60      | 170298,31      |
| QUANTITY_IN_100KG | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further |                | 1472,80        | 35549,02       | 42616,72       |
| VALUE_IN_EUROS    | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further | 47262          | 123221         | 10002843       | 13539497       |
| VALUE_IN_EUROS    | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further | 53345          | 161651         | 15838399       | 26117819       |
| VALUE_IN_EUROS    | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further |                | 227320         | 5534719        | 6547764        |

|                    | Jan.-Dec. 2018 | Jan.-Dec. 2019 | Jan.-Dec. 2020 | Jan.-Dec. 2021 |
|--------------------|----------------|----------------|----------------|----------------|
| QUANTITY_IN_TONNES | 46             | 328            | 20.005         | 30.027         |
| VALUE_IN_EUROS     | 100.607        | 512.192        | 31.375.961     | 46.205.080     |
| EUR/ tonne         | 2.194          | 1.563          | 1.568          | 1.539          |

Price difference with overall imports from Turkey in the EU

## INFORMATION ON THE TURKISH STAINLESS STEEL INDUSTRY

### 1. STAINLESS STEEL SLAB PRODUCTION CAPACITY (CRUDE STAINLESS STEEL)

*[This section contains sensitive information and estimates of Turkish crude stainless steel production and capacity.]*

#### Information on theoretical capacities

See attached article: *VOD Plant upgraded from VD plant by Primetal technologies receives FAC from Colakoglu in Turkey*

### 2. TURKISH STAINLESS STEEL COMPANIES

*[This section contains sensitive information and estimates of Turkish stainless steel producers.]*

| Players   | Imports (source) | Production capabilities |            |             |             |
|-----------|------------------|-------------------------|------------|-------------|-------------|
|           |                  | Stainless slabs         | Black SSHR | White SSHR  | SSCR        |
| Posco TST | [sensitive]      | -                       | -          | [sensitive] | [sensitive] |
| Trinox    | [sensitive]      | -                       | -          | [sensitive] | [sensitive] |

### 3. INFORMATION ON TURKISH PRODUCTION / CONSUMPTION

*[This section contains sensitive market information on Turkish stainless steel trade and consumption. The available graphs show an increase in imports of stainless steel.]*

It notably highlights the fact that the domestic producers of SSCR operate and will continue operating at high level of capacity showing that SSHR produced in Turkey has virtually no commercial opportunities in Turkey. Production of SSHR in Turkey will therefore most likely be exported.



## NEWS & PRESS RELEASES



London, February 26, 2021

### **VOD PLANT UPGRADED FROM VD PLANT BY PRIMETALS TECHNOLOGIES RECEIVES FAC FROM ÇOLAKOĞLU IN TURKEY**

- Heat size of 295 metric tons makes VOD plant largest in the world
- VOD treatments allows production of special steels with very low carbon content
- First production of some special stainless steel grades in Turkey
- Broadens product range and opens up additional markets for Çolakoğlu

In December 2020, the VOD (Vacuum Oxygen Decarburization) plant, upgraded from an existing VD (Vacuum Degassing) plant by Primetals Technologies at the Dilovası meltshop of Turkish steel producer **Çolakoğlu Metalurji A.S.** (Çolakoğlu) received the Final Acceptance Certificate. With a heat size of 295 metric tons, the VOD is the largest worldwide. The aim of the modernization project was to enable production of special steels, like IF grades, ULC grades or stainless steels. This

helps Çolakoğlu to broaden its product range and enter additional markets. Immediately after start-up, for the first time in Turkey, stainless steel grades 304 and 304L were produced with the aid of the new VOD plant.

For the VOD plant for Çolakoğlu, Primetals Technologies was responsible for the engineering and supplied all the core components. These included, for example, valve stands, the oxygen blowing lance system as well as filters and a filter cleaning system installed before vacuum pumps. The scope also encompassed the modernization of the existing automation system. The level 2 system including process models was modernized in order to operate the VOD plant. Additionally, all required instrumentation of the equipment was supplied by Primetals Technologies.

Çolakoğlu operates an electric steel plant in Dilovası, in the west of Turkey. The main products of the plant are slabs for further processing in a hot rolling mill, and billets for producing reinforcing steel bars and steel rock bolt. The Çolakoğlu steel making plant, one of the largest in the world, was supplied by Primetals Technologies and is in operation for several years. This latest modernization project marks another step in the successful business partnership of Çolakoğlu and Primetals Technologies.



In the Dilovası meltshop of Turkish steelmaker Çolakoğlu Metalurji A.S. (Çolakoğlu), Primetals Technologies upgraded an existing VD(Vacuum Degassing) plant to a VOD (Vacuum Oxygen Decarburization) plant.

**Primetals Technologies, Limited**, headquartered in London, United Kingdom, is a pioneer and world leader in the fields of engineering, plant building, and the provision of lifecycle services for the metals industry. The company offers a complete technology, product, and services portfolio that includes integrated electrics and automation, digitalization, and environmental solutions. This covers every step of the iron and steel production chain—from the raw materials to the finished product—and includes the latest rolling solutions for the nonferrous

metals sector. Primetals Technologies is a joint venture of Mitsubishi Heavy Industries and partners, with around 7,000 employees worldwide. To learn more about Primetals Technologies, visit the company website [www.primetals.com](http://www.primetals.com).



Source: Turkish Government database  
[https://biruni.tuik.gov.tr/disticaretapp/menu\\_ing.zul](https://biruni.tuik.gov.tr/disticaretapp/menu_ing.zul)

| Imports of stainless steel slabs in Turkey (in tonnes) | 2018     | 2019       | 2020       | 2021       |
|--|----------|------------|------------|------------|
| Imports from Indonesia                                 | 0        | 6.368      | 14.172     | 60.684     |
| <b>Index</b>   | <b>0</b> | <b>100</b> | <b>223</b> | <b>953</b> |
| Imports from all sources                               | 0        | 6.369      | 14.173     | 60.711     |
| <b>Index</b>   | <b>0</b> | <b>100</b> | <b>223</b> | <b>953</b> |

country

| Year | HS6           | HS6 name  | Country      | Country name   | Unit |          | Import quantity 1 | Import quantity 2 | Import Euro        |
|------|---------------|---|--------------|----------------|------|----------|-------------------|-------------------|--------------------|
|      |               | Semi-finished products of stainless steel, of rectangular "other than square" cross-section |              |                |      |          |                   |                   |                    |
| 2018 | 721891        |   | 4            | Germany        | KG   | 0        | 0                 | 1                 | 291                |
|      |               |   | 6            | United Kingdom | KG   | 0        | 0                 | 0                 | 0                  |
|      |               |   | <b>Total</b> |                |      | <b>0</b> | <b>0</b>          | <b>1</b>          | <b>291</b>         |
|      | <b>Total:</b> |   |              |                |      | <b>0</b> | <b>0</b>          | <b>0,001</b>      | <b>0,291</b>       |
|      |               | Semi-finished products of stainless steel, of rectangular "other than square" cross-section |              |                |      |          |                   |                   |                    |
| 2019 | 721891        |   | 4            | Germany        | KG   | 0        | 0                 | 1.320             | 18.867             |
|      |               |   | 700          | Indonesia      | KG   | 0        | 0                 | 6.367.940         | 10.333.764         |
|      |               |   | <b>Total</b> |                |      | <b>0</b> | <b>0</b>          | <b>6.369.260</b>  | <b>10.352.631</b>  |
|      | <b>Total:</b> |   |              |                |      | <b>0</b> | <b>0</b>          | <b>6.369</b>      | <b>10.352.631</b>  |
|      |               | Semi-finished products of stainless steel, of rectangular "other than square" cross-section |              |                |      |          |                   |                   |                    |
| 2020 | 721891        |   | 4            | Germany        | KG   | 0        | 0                 | 1.495             | 22.142             |
|      |               |   | 700          | Indonesia      | KG   | 0        | 0                 | 14.171.700        | 20.791.958         |
|      |               |   | <b>Total</b> |                |      | <b>0</b> | <b>0</b>          | <b>14.173.195</b> | <b>20.814.100</b>  |
|      | <b>Total:</b> |   |              |                |      | <b>0</b> | <b>0</b>          | <b>14.173</b>     | <b>20.814.100</b>  |
|      |               | Semi-finished products of stainless steel, of rectangular "other than square" cross-section |              |                |      |          |                   |                   |                    |
| 2021 | 721891        |   | 4            | Germany        | KG   | 0        | 0                 | 755               | 10.352             |
|      |               |   | 61           | Czech Republic | KG   | 0        | 0                 | 26.209            | 109.134            |
|      |               |   | 81           | Uzbekistan     | KG   | 0        | 0                 | 0                 | -                  |
|      |               |   | 700          | Indonesia      | KG   | 0        | 0                 | 60.684.380        | 108.778.772        |
|      |               |   | <b>Total</b> |                |      | <b>0</b> | <b>0</b>          | <b>60.711.344</b> | <b>108.898.258</b> |
|      | <b>Total:</b> |   |              |                |      | <b>0</b> | <b>0</b>          | <b>60.711</b>     | <b>108.898.258</b> |

| in kg |                           | Country | TURKEY       |               |            |            |            |            |                |             |               | Totals     |
|-------|---------------------------|---------|--------------|---------------|------------|------------|------------|------------|----------------|-------------|---------------|------------|
|       |                           | Harbor  | KOLONEDALE   |               |            |            |            |            |                |             |               |            |
| Year  | Kode HS                   | Moon    | [01] January | [02] February | [04] April | [05] Mei   | [06] June  | [07] July  | [09] September | [October 10 | [12] December |            |
| 2019  | [72189100] Oth stainless  |         | 318.240      |               |            |            |            |            |                | 6.038.930   |               | 6.357.170  |
| 2020  | [72189100] Oth stainless  |         |              | 4.075.060     |            |            | 10.068.780 |            |                |             | 10.096.760    | 24.240.600 |
| 2021  | [72189100] Oth stainless  |         |              | 9.992.640     |            | 20.253.700 |            | 10.055.680 | 10.075.900     |             |               | 50.377.920 |
| 2022  | [72189100] Semi- finished |         |              |               | 10.121.140 |            |            |            |                |             |               | 10.121.140 |
|       | Totals                    |         | 318.240      | 14.067.700    | 10.121.140 | 20.253.700 | 10.068.780 | 10.055.680 | 10.075.900     | 6.038.930   | 10.096.760    | 91.096.830 |

Sumber : <https://www.bps.go.id> di akses pada 2022\_06\_09T15\_07\_29\_045Z

TURKEY IMPORTS - SLABS FROM INDONESIA

|      | HS6   | 721891 |        |
|------|-------|--------|--------|
| Year | Month | MT     | EUR/MT |
| 2019 | 1     |        |        |
|      | 2     |        |        |
|      | 3     | 318    | 1.486  |
|      | 4     |        |        |
|      | 5     |        |        |
|      | 6     |        |        |
|      | 7     |        |        |
|      | 8     |        |        |
|      | 9     |        |        |
|      | 10    |        |        |
|      | 11    | 6.050  | 1.630  |
|      | 12    |        |        |
| 2020 | 1     |        |        |
|      | 2     |        |        |
|      | 3     | 4.078  | 1.499  |
|      | 4     |        |        |
|      | 5     |        |        |
|      | 6     |        |        |
|      | 7     |        |        |
|      | 8     | 10.094 | 1.454  |
|      | 9     |        |        |
|      | 10    |        |        |
|      | 11    |        |        |
|      | 12    |        |        |
| 2021 | 1     |        |        |
|      | 2     | 10.103 | 1.505  |
|      | 3     |        |        |
|      | 4     | 10.040 | 1.505  |
|      | 5     |        |        |
|      | 6     | 10.141 | 1.759  |
|      | 7     |        |        |
|      | 8     | 20.317 | 1.850  |
|      | 9     |        |        |
|      | 10    |        |        |
|      | 11    | 10.083 | 2.284  |
|      | 12    |        |        |
| 2022 | 1     |        |        |
|      | 2     |        |        |
|      | 3     |        |        |
|      | 4     |        |        |
|      | 5     |        |        |
|      | 6     |        |        |

TURKEY EXPORTS - HR COIL TO ITALY

|      | HS6   | 721912, 721913 and 721914 |        |
|------|-------|---------------------------|--------|
| Year | Month | MT                        | EUR/MT |
| 2019 | 1     |                           |        |
|      | 2     |                           |        |
|      | 3     |                           |        |
|      | 4     | 315                       | 1.554  |
|      | 5     |                           |        |
|      | 6     |                           |        |
|      | 7     |                           |        |
|      | 8     |                           |        |
|      | 9     | 10                        | 1.987  |
|      | 10    |                           |        |
|      | 11    | 19                        | 1.971  |
|      | 12    | 5.995                     | 1.706  |
| 2020 | 1     |                           |        |
|      | 2     |                           |        |
|      | 3     |                           |        |
|      | 4     |                           |        |
|      | 5     |                           |        |
|      | 6     |                           |        |
|      | 7     | 4.033                     | 1.456  |
|      | 8     |                           |        |
|      | 9     |                           |        |
|      | 10    | 9.875                     | 1.531  |
|      | 11    |                           |        |
|      | 12    | 49                        | 1.508  |
| 2021 | 1     |                           |        |
|      | 2     |                           |        |
|      | 3     | 4.696                     | 1.594  |
|      | 4     | 5.018                     | 1.617  |
|      | 5     | 5.156                     | 1.543  |
|      | 6     |                           |        |
|      | 7     | 5.037                     | 1.591  |
|      | 8     | 4.965                     | 1.860  |
|      | 9     | 4.919                     | 1.875  |
|      | 10    |                           |        |
|      | 11    |                           |        |
|      | 12    |                           |        |
| 2022 | 1     |                           |        |
|      | 2     | 12.466                    | 2.119  |
|      | 3     | 10.360                    | 1.936  |
|      | 4     | 7.357                     | 2.444  |
|      | 5     |                           |        |
|      | 6     |                           |        |

|             | Imports | Exports | Balance    |
|-------------|---------|---------|------------|
| Volume (MT) | 81.224  | 80.270  | 954<br>99% |

| In tonnes | Quarter | Turkish stainless slab imports from Indonesia | Turkish SSHR coil exports to Italy | Balance |
|-----------|---------|---|------------------------------------|---------|
| 2019      | Q1      | 318   |                                    |         |
|           | Q2      |   | 315                                | 3       |
|           | Q3      |   | 10                                 |         |
|           | Q4      | 6.050   | 6.014                              | 35      |
| 2020      | Q1      | 4.078   |                                    |         |
|           | Q2      |   |                                    |         |
|           | Q3      | 10.094  | 4.033                              | 45      |
|           | Q4      |   | 9.924                              | 170     |
| 2021      | Q1      | 10.103  | 4.696                              |         |
|           | Q2      | 20.181  | 10.174                             |         |
|           | Q3      | 20.317  | 14.921                             | 493     |
|           | Q4      | 10.083  |                                    |         |
| 2022      | Q1      |   | 22.826                             |         |
|           | Q2      |   | 7.357                              | 218     |

| In EUR/ Tonnes     | Import price of slabs | Export price of SSHR |
|--------------------|-----------------------|----------------------|
| 2019-Shipment 1    | 1.486                 | 1.554                |
| 2019-Shipment 2    | 1.630                 | 1.706                |
| 2020-Shipment 3    | 1.499                 | 1.456                |
| 2021-Shipment 4    | 1.454                 | 1.531                |
| 2021-Shipment 5    | 1.505                 | 1.606                |
| 2021-Shipment 6    | 1.505                 | 1.567                |
| 2021-Shipment 7    | 1.759                 | 1.868                |
| 2021-Shipments 8-9 | 1.994                 | 2.135                |
| Average difference |                       | 74                   |

| Exports of SSHR from Turkey<br>(in tonnes) | 2018       | 2019       | 2020       | 2021        |
|--|------------|------------|------------|-------------|
| To the EU27                                | 2.176      | 8.495      | 15.477     | 34.116      |
| <i>Index</i>                               | <i>100</i> | <i>390</i> | <i>711</i> | <i>1568</i> |
| To other countries                         | 6.476      | 5.114      | 3.636      | 4.599       |
| <i>Index</i>                               | <i>100</i> | <i>79</i>  | <i>56</i>  | <i>71</i>   |

Codes used 721911,721912,721913,721914,721922,721923,721924,722011,722012  
6-digit  
8-digit

|     |               |           |           |            |            |
|-----|---------------|-----------|-----------|------------|------------|
|     |               | 2018      | 2019      | 2020       | 2021       |
| HS8 | kg            | 2.174.763 | 8.494.941 | 15.476.946 | 33.960.154 |
|     | metric tonnes | 2175      | 8495      | 15477      | 33960      |
| HS6 | kg            | 2.175.658 | 8.494.998 | 15.476.946 | 34.116.374 |
|     | metric tonnes | 2176      | 8495      | 15477      | 34116      |

|     |               |           |            |            |            |
|-----|---------------|-----------|------------|------------|------------|
|     |               | 2018      | 2019       | 2020       | 2021       |
| HS8 | kg            | 8.652.262 | 13.609.087 | 19.112.609 | 38.715.163 |
|     | metric tonnes | 8652      | 13609      | 19113      | 38715      |
| HS6 | kg            | 8.652.262 | 13.609.087 | 19.112.609 | 38.715.163 |
|     | metric tonnes | 8652      | 13609      | 19113      | 38715      |

|     |               |           |           |           |           |
|-----|---------------|-----------|-----------|-----------|-----------|
|     |               | 2018      | 2019      | 2020      | 2021      |
| HS8 | kg            | 6.477.499 | 5.114.146 | 3.635.663 | 4.755.009 |
|     | metric tonnes | 6.477     | 5.114     | 3.636     | 4.755     |
| HS6 | kg            | 6.476.604 | 5.114.089 | 3.635.663 | 4.598.789 |
|     | metric tonnes | 6.476     | 5.114     | 3.636     | 4.599     |

External trade  
by HS8 and  
partner country

| Year | HS8    | HS8 name | Country | Country name | Unit | ountry Group | ountry Group | Sum        |
|------|--------|----------|---------|--------------|------|--------------|--------------|------------|
| 2018 | Total: |          |         |              |      | 2.092.544    | 82.219       | 2.174.763  |
| 2019 | Total: |          |         |              |      | 8.386.898    | 108.043      | 8.494.941  |
| 2020 | Total: |          |         |              |      | 15.390.116   | 86.830       | 15.476.946 |
| 2021 | Total: |          |         |              |      | 33.959.808   | 346          | 33.960.154 |

External trade  
by HS6 and  
partner country

| Year | HS6    | HS6 name  | Country | Country name | Unit | Export quantity<br>1 | Export quantity<br>2 | Export Euro |
|------|--------|---|---------|--------------|------|----------------------|----------------------|-------------|
| 2018 | 721911 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi  | Total   |              |      | 52.499               | 0                    | 55.067      |
|      | 721912 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thic | Total   |              |      | 617.265              | 0                    | 686.620     |
|      | 721913 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi  | Total   |              |      | 2.273.334            | 0                    | 2.961.461   |
|      | 721914 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi  | Total   |              |      | 711.770              | 0                    | 1.875.978   |
|      | 721922 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a  | Total   |              |      | 2.976.496            | 0                    | 7.351.907   |
|      | 721923 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a  | Total   |              |      | 1.096.651            | 0                    | 2.664.275   |
|      | 721924 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a  | Total   |              |      | 105.417              | 0                    | 263.475     |
|      | 722011 | Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >  | Total   |              |      | 359.490              | 0                    | 335.864     |
|      | 722012 | Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of <  | Total   |              |      | 459.340              | 0                    | 566.095     |

External trade  
by HS6 and  
partner country

| Year | HS6    | HS6 name | Country | Country name | Unit | Country Group 1 | Country Group 2 | Sum        |
|------|--------|----------|---------|--------------|------|-----------------|-----------------|------------|
|      |        |          |         |              |      |                 |                 |            |
| 2018 | Total: |          |         |              |      | 2.093.439       | 82.219          | 2.175.658  |
|      |        |          |         |              |      |                 |                 | 0          |
| 2019 | Total: |          |         |              |      | 8.386.955       | 108.043         | 8.494.998  |
|      |        |          |         |              |      |                 |                 | 0          |
| 2020 | Total: |          |         |              |      | 15.390.116      | 86.830          | 15.476.946 |
|      |        |          |         |              |      |                 |                 | 0          |
| 2021 | Total: |          |         |              |      | 33.960.028      | 156.346         | 34.116.374 |

|        |  |                       |        |        |        |                       |
|--------|--|-----------------------|--------|--------|--------|-----------------------|
| 2019   | Total:   | 8.652.262             | 0      | 0      | 0      | 16.760.742            |
|        |  |                       |        |        |        |                       |
| 721911 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi<br>Total  | 72.301                | 0      | 0      | 0      | 68.592                |
| 721912 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thic<br>Total | 2.531.737             | 0      | 0      | 0      | 4.784.615             |
| 721913 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi<br>Total  | 4.069.331             | 0      | 0      | 0      | 6.763.426             |
| 721914 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi<br>Total  | 3.030.035             | 0      | 0      | 0      | 16.738.589            |
| 721922 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a<br>Total  | 2.423.034             | 0      | 0      | 0      | 6.622.721             |
| 721923 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a<br>Total  | 567.616               | 0      | 0      | 0      | 1.226.137             |
| 721924 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a<br>Total  | 228.640               | 0      | 0      | 0      | 341.135               |
| 722011 | Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of ><br>Total  | 372.703               | 0      | 0      | 0      | 396.441               |
| 722012 | Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of <<br>Total  | 313.690<br>13.609.087 | 0<br>0 | 0<br>0 | 0<br>0 | 376.334<br>37.317.990 |
| 721911 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi<br>Total  | 70.988                | 0      | 0      | 0      | 111.460               |
| 721912 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thic<br>Total | 4.149.848             | 0      | 0      | 0      | 6.455.130             |
| 721913 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi<br>Total  | 8.097.041             | 0      | 0      | 0      | 11.816.266            |
| 721914 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi<br>Total  | 3.393.166             | 0      | 0      | 0      | 4.545.089             |

|      |        |   |       |            |   |   |   |            |
|------|--------|---|-------|------------|---|---|---|------------|
| 2021 | 721922 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a  | Total | 2.027.213  | 0 | 0 | 0 | 4.708.163  |
|      | 721923 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a  | Total | 583.704    | 0 | 0 | 0 | 1.333.734  |
|      | 721924 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a  | Total | 192.088    | 0 | 0 | 0 | 382.733    |
|      | 722011 | Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >  | Total | 253.953    | 0 | 0 | 0 | 329.811    |
|      | 722012 | Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of <  | Total | 344.608    | 0 | 0 | 0 | 381.661    |
|      | Total: |   |       | 19.112.609 | 0 | 0 | 0 | 30.064.047 |
|      | 721911 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi  | Total | 52.700     | 0 | 0 | 0 | 128.746    |
|      | 721912 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thic | Total | 9.412.606  | 0 | 0 | 0 | 16.500.674 |
|      | 721913 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi  | Total | 17.025.646 | 0 | 0 | 0 | 28.763.125 |
|      | 721914 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, in coils, of a thi  | Total | 4.849.882  | 0 | 0 | 0 | 8.152.713  |
|      | 721922 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a  | Total | 4.841.672  | 0 | 0 | 0 | 14.719.459 |
|      | 721923 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a  | Total | 1.906.889  | 0 | 0 | 0 | 5.441.843  |
|      | 721924 | Flat-rolled products of stainless steel, of a width of >= 600 mm, not further worked than hot-rolled, not in coils, of a  | Total | 117.052    | 0 | 0 | 0 | 270.703    |
|      | 722011 | Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of >  | Total | 231.211    | 0 | 0 | 0 | 313.136    |
|      | 722012 | Flat-rolled products of stainless steel, of a width of < 600 mm, not further worked than hot-rolled, of a thickness of <  | Total | 277.505    | 0 | 0 | 0 | 532.815    |
|      |        |   |       | 38.715.163 | 0 | 0 | 0 | 74.823.214 |



## MARKET INFORMATION ON THE NEW PATTERN OF TRADE

### 1. INFORMATION ON HOT ROLLING OF INDONESIAN SLABS [SENSITIVE]

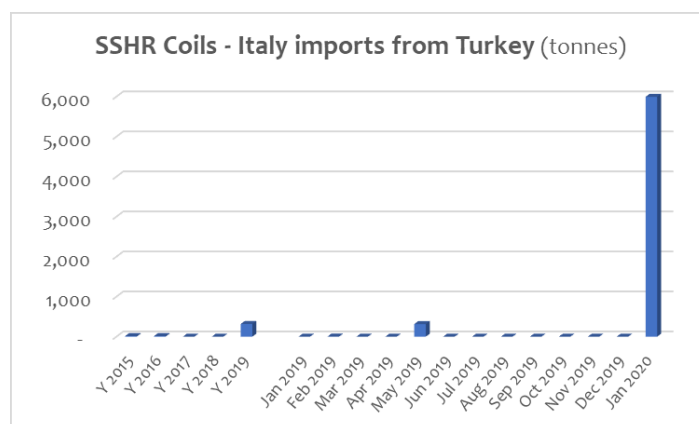
*[This section contains business confidential information on Turkish hot-rolling capacity.]*

#### Eurofer's submission in case AD658 (Comments on the provisional Regulation - p.10-11, non confidential)

...

#### 1.2.1.2 Marcegaglia continues its aggressive import strategy from dumping countries

The fact that the business model of the Union's largest SSHR user heavily relies on distortions is further evidenced by the aggressive import strategy is now being implemented by Marcegaglia to undermine the safeguard measures in place. For instance, despite Turkey not being a stainless steel producing country, the figure below demonstrates that stainless steel (black) coils were imported to Italy from Turkey in January 2020. In addition, official customs data shows that in November 2019 Turkey imported around 6,000 tonnes of stainless slabs from Indonesia. Following the rolling operation, this material was then imported Italy as stainless black coils in January 2020. The non-confidential file confirms that, during the IP, Marcegaglia purchased volumes from Turkey (small batch for first industrial trial in May 2019) as reported by the company in its questionnaire.



Source: Eurostat

According to the market information available to Eurofer, *[Confidential: information pertaining to the Union producers' market intelligence]*. This anomalous routing made possible the arrival of the Indonesian-sourced distorted material to the EU without being subject to the safeguard measures. Indeed, as Turkey is listed as a developing country and traditionally does not export SSHR to the Union (below 3% import share threshold), it is not covered by the safeguard measures on SSHR.

The Union stainless industry is greatly alarmed that this new routing of Indonesian SSHR, which undermines the existing safeguard measures. *[Confidential: information pertaining to the rolling capacity of Turkish steel producers]* This routing would not only undermine the effectiveness of the safeguard measures but would put at risk any anti-dumping and possible countervailing measures the Commission would implement in the context of the two running investigations. It is clear that users importing black SSHR to Italy are seeking alternatives to keep on importing SSHR from Indonesia at artificially low prices *[Confidential: information pertaining to the Union producers' market intelligence]* in order to circumvent any measures affecting Indonesia.

Against this background, it should also be taken into account in the Union's interest assessment with regard to the LDR that the raw material distortions identified in this investigation very seriously threaten the Union market, since they may enter the Union through other import routes.

....

## **2. INFORMATION ON ANNEALING AND PICKLING CAPACITIES OF MARCEGAGLIA**

See attached Marcegaglia's brochure

It is moreover notable that the reduction in the rhythm of the imports of SSHR from Turkey at the end of 2021 coincide with a major incident affecting its AP lines:

See Article on fire at Marcegaglia pickling line in October 2021:  
<https://www.metalbulletin.com/Article/4012004/Marcegaglia-Specialties-pickling-line-out-for-2-3-months-due-to-fire-cold-rolled-stainless-coils.html>



MARCEGAGLIA

Gazoldo degli Ippoliti  
plant

**MARCEGAGLIA GROUP**

# GLOBAL PLAYER IN STEEL

**MARCEGAGLIA IS THE ITALIAN  
INDUSTRIAL GROUP LEADING THE EUROPEAN  
AND WORLDWIDE STEEL MARKET.**

**A UNIQUE COMBINATION OF THE DYNAMIC ITALIAN  
FAMILY BUSINESS MODEL WITH THE GREAT  
OPERATING CAPACITY AND PRESENCE  
IN THE INTERNATIONAL MARKETS,  
TYPICAL OF THE LARGE CORPORATIONS.**

**6.2 MILLION TONS**  
PROCESSED YEARLY

**5.5 BILLION EUROS SALES**  
MARCEGAGLIA HOLDING

**(5.3 BILLION EUROS SALES** MARCEGAGLIA STEEL)

**6,600 EMPLOYEES**

**28 STEEL PLANTS**

**60 SALES OFFICES**

**1<sup>st</sup> INDEPENDENT PLAYER**  
IN STEEL PROCESSING SECTOR IN THE WORLD

**1<sup>st</sup> PRODUCER OF STAINLESS STEEL**

**WELDED TUBES** IN THE WORLD

**1<sup>st</sup> PRODUCER OF CARBON STEEL**

**WELDED TUBES** IN EUROPE

**1<sup>st</sup> SERVICE CENTER** IN ITALY

# CORPORATE CULTURE

INDEPENDENCE, DYNAMISM, RESILIENCE,  
COMPETENCE, VERSATILITY, REACTIVITY:  
IN 60 YEARS OF HISTORY,  
THESE DISTINCTIVE VALUES MADE MARCEGAGLIA  
THE PRIVILEGED PARTNER  
IN THE STEEL PROCESSING INDUSTRY.

THE COMPANY CULTURE IS BASED  
ON PEOPLE CENTRICITY AND SHARING  
OF THE SAME KEY VALUES WHICH  
ARE SHAPING MARCEGAGLIA  
UNIQUE BUSINESS MODEL.

# STEEL CORE

**CORE BUSINESS ACTIVITIES, CONTROLLED BY MARCEGAGLIA STEEL (HOLDING COMPANY, WHICH REPRESENTS 95% OF TOTAL ACTIVITIES), ARE ORGANIZED THROUGH FIVE DIFFERENT OPERATING COMPANIES: MARCEGAGLIA CARBON STEEL AND MARCEGAGLIA RAVENNA WITH THE FLAT PRODUCTS AND WELDED TUBES DIVISIONS, MARCEGAGLIA SPECIALTIES AND MARCEGAGLIA GAZOLDO INOX WITH THE STAINLESS PRODUCTS AND COLD DRAWN BARS DIVISIONS, MARCEGAGLIA PLATES FOR THE HEAVY PLATES PRODUCTION.**

**MARCEGAGLIA INVESTMENTS IS THE HOLDING FOR THE DIVERSIFIED ACTIVITIES (5% OF TOTAL ACTIVITIES).**

FIN. MAR.

MARFIN

Staff Corporate

MARCEGAGLIA HOLDING

MARCEGAGLIA  
STEELMARCEGAGLIA  
INVESTMENTSMARCEGAGLIA  
RAVENNACARBON STEEL  
FLAT PRODUCTS

1 PLANT ITALY

MARCEGAGLIA  
CARBON STEELCARBON STEEL  
FLAT PRODUCTSCARBON STEEL  
WELDED TUBESHEADQUARTERS AND PLANT  
GAZOLDO DEGLI IPPOLITI

1 PLANT ITALY

5 PLANTS ITALY  
3 WAREHOUSES ITALYMARCEGAGLIA  
GAZOLDO INOXSTAINLESS STEEL  
FLAT PRODUCTS

1 PLANT ITALY

MARCEGAGLIA  
SPECIALTIESSTAINLESS STEEL  
PRODUCTSCOLD-DRAWN  
BARSHEADQUARTERS  
GAZOLDO DEGLI IPPOLITI

1 PLANT ITALY

1 PLANT ITALY

MARCEGAGLIA  
PLATES

HEAVY PLATES

HEADQUARTERS  
GAZOLDO DEGLI  
IPPOLITI

1 PLANT ITALY

MARCEGAGLIA  
PALINI E BERTOLI

1 PLANT

BUILDING

Marcegaglia Buildtech  
M. Gulf Qatar

HOME PRODUCTS

Oskar Imat

ENERGY

CO.GE.AM Other particip.

EuroEnergy Other particip.

ETA

ENGINEERING

Elet.Ca Made HSE

HOSPITALITY ACTIVITIES  
& REAL ESTATE

Albarella Other particip.

Pugnochiuso

Gaia Turismo Other particip.

Palazzo Agricoltura

Gabetti Property Solutions

OTHER PARTICIPATIONS

PLANTS &amp; SALES OFFICES

MARCEGAGLIA  
CENTRAL AMERICAMARCEGAGLIA COLOMBIA  
1 PLANTMARCEGAGLIA MEXICO  
1 PLANTMARCEGAGLIA DO BRASIL  
1 PLANTMARCEGAGLIA NOVERO  
1 PLANTMARCEGAGLIA POLAND  
2 PLANTSMARCEGAGLIA UK  
2 PLANTS

SALES OFFICES

MARCEGAGLIA  
DEUTSCHLANDMARCEGAGLIA  
FRANCEMARCEGAGLIA  
IBERICAMARCEGAGLIA  
NORTH EUROPEMARCEGAGLIA  
ROMANIAOTHER  
PARTICIPATIONS

Fontana

SIM

Consorzio  
ABSolute

PLANTS &amp; SALES OFFICES

Mariven

MARCEGAGLIA RU 1 PLANT

MARCEGAGLIA TURKEY 1 PLANT

MARCEGAGLIA USA 1 SALES OFFICE

Metal  
InterconnectorGas  
Intensive

| EMPLOYEES | TURNOVER (M/€)   |                 | PRODUCTION (KT/y) |                 |
|-----------|------------------|-----------------|-------------------|-----------------|
| 4,300     | 3,450 TOTAL      |                 | 4,650 TOTAL       |                 |
|           | 2,300            | 1,150           | 3,100             | 1,550           |
|           | FLAT<br>PRODUCTS | WELDED<br>TUBES | FLAT<br>PRODUCTS  | WELDED<br>TUBES |

| E     | T (M/€)                        |                        | P (KT/y)                       |                        |
|-------|--------------------------------|------------------------|--------------------------------|------------------------|
| 1,000 | 1,350 TOTAL                    |                        | 700 TOTAL                      |                        |
|       | 1,200                          | 150                    | 500                            | 200                    |
|       | STAINLESS<br>STEEL<br>PRODUCTS | COLD-<br>DRAWN<br>BARS | STAINLESS<br>STEEL<br>PRODUCTS | COLD-<br>DRAWN<br>BARS |

| E   | T (M/€) | P (KT/y) |
|-----|---------|----------|
| 200 | 400     | 800      |

| E     | R (M/€) | P (KT/y) |
|-------|---------|----------|
| 1,100 | 250     | 50       |



**Gazoldo degli Ippoliti HQ**  
Boltiere, ITA  
Casalmaggiore, ITA  
Corsico, ITA  
Dusino San Michele, ITA  
Lainate, ITA  
Lomagna, ITA  
Osteria Grande, ITA  
Rivoli, ITA  
Tezze sul Brenta, ITA  
Dudley, UK  
Rotherham, UK  
Funza, Colombia  
Garuva, Brazil  
Kluczbork, Poland  
Praszka, Poland  
Querétaro, Mexico

#### SALES OFFICES

Barcelona, Spain  
Cluj, Romania  
Düsseldorf, Germany  
Luxembourg, Luxembourg  
Lyon, France



**Gazoldo degli Ippoliti HQ**  
San Giorgio di Nogaro, ITA (2)



Ravenna, ITA



Gazoldo degli Ippoliti, ITA



**Gazoldo degli Ippoliti HQ**  
Contino, ITA  
Forlì, ITA  
Istanbul, Turkey  
Vladimir, Russia

**SALES OFFICES**  
Munhall, USA

■ us

■ mx

■ co

■ br

#### HARBOURS AND RAIL TERMINALS

Ravenna, ITA  
San Giorgio di Nogaro, ITA

#### OUR MAIN LOGISTIC HUBS

Kolding, Gdansk, Newport, Antwerpen,  
Hagen, Siegen, Karlsruhe, Lyon, Constanta,  
Gemlik, Tarragona

# STEEL IN THE WORLD





## STEEL PRODUCTION

Via either blast furnace, using iron mineral and carbon, or electric furnace, using re-melted scrap steel.

## ACTIVITIES

IRON MAKING  
STEEL MAKING  
CASTING  
HOT ROLLING

## OUTPUT

COILS  
BARS  
HEAVY  
PLATES

## 1<sup>st</sup> TRANSFORMATION

ARE CHEMICALLY AND/OR MECHANICALLY PROCESSED TO MAKE THEM SUITABLE FOR SPECIFIC INDUSTRIAL PURPOSES

PICKLING  
COLD ROLLING  
GALVANIZING  
PRE-PAINTING

PICKLING  
COLD ROLLING

GALVANISED,  
PICKLED,  
COLD ROLLED  
AND PRE-PAINTED COILS

STAINLESS STEEL HR/CR  
COILS

## 2<sup>nd</sup> TRANSFORMATION

ADVANCED PROCESSING TO CUSTOMISE STEEL PRODUCTS ON CLIENTS SPECIFIC REQUESTS

TUBE FORMING, SLITTING  
AND CUTTING TO LENGTH

TUBE FORMING, SLITTING  
AND CUTTING TO LENGTH,  
DRAWING

TUBES, SHEETS

TUBES, STRIPS,  
STAINLESS SHEETS,  
DRAWN BARS

Marcegaglia is covering the whole downstream and distribution steel value chain, both horizontally and vertically, thanks to its **unique strategic position**. Marcegaglia is the first steel processor with a range of products that varies from carbon to stainless, from long to flat products, from commodity to specialty.

## DISTRIBUTION

DIRECT SELLING  
AND/OR RETAILING  
TO INDUSTRIAL CLIENTS  
OR FURTHER PROCESSING  
UNDER REQUEST

FINISHING  
DISTRIBUTION

FINISHING  
DISTRIBUTION

ALL PRODUCTS

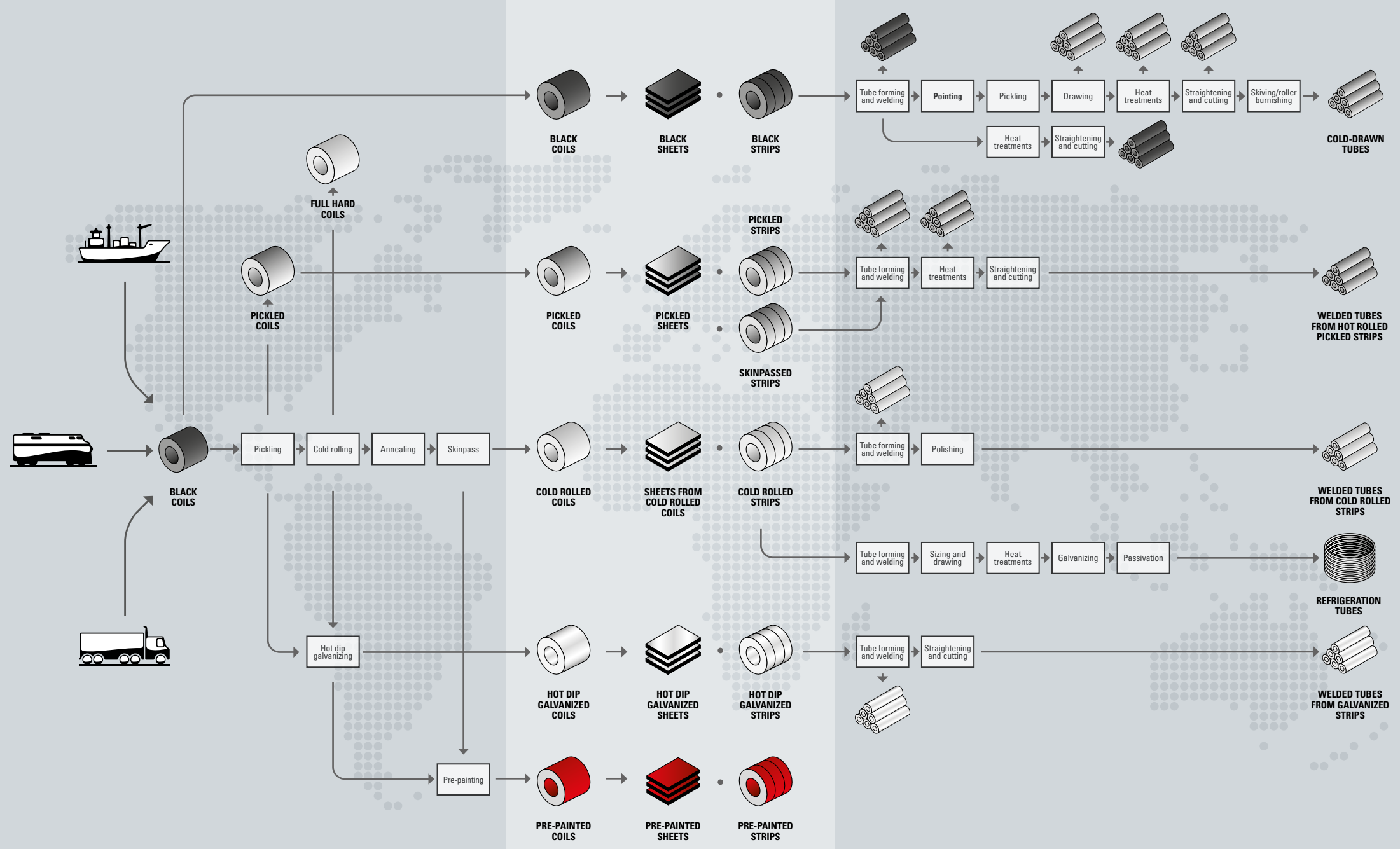
ALL PRODUCTS

*Carbon steel products*  
*Stainless steel products*

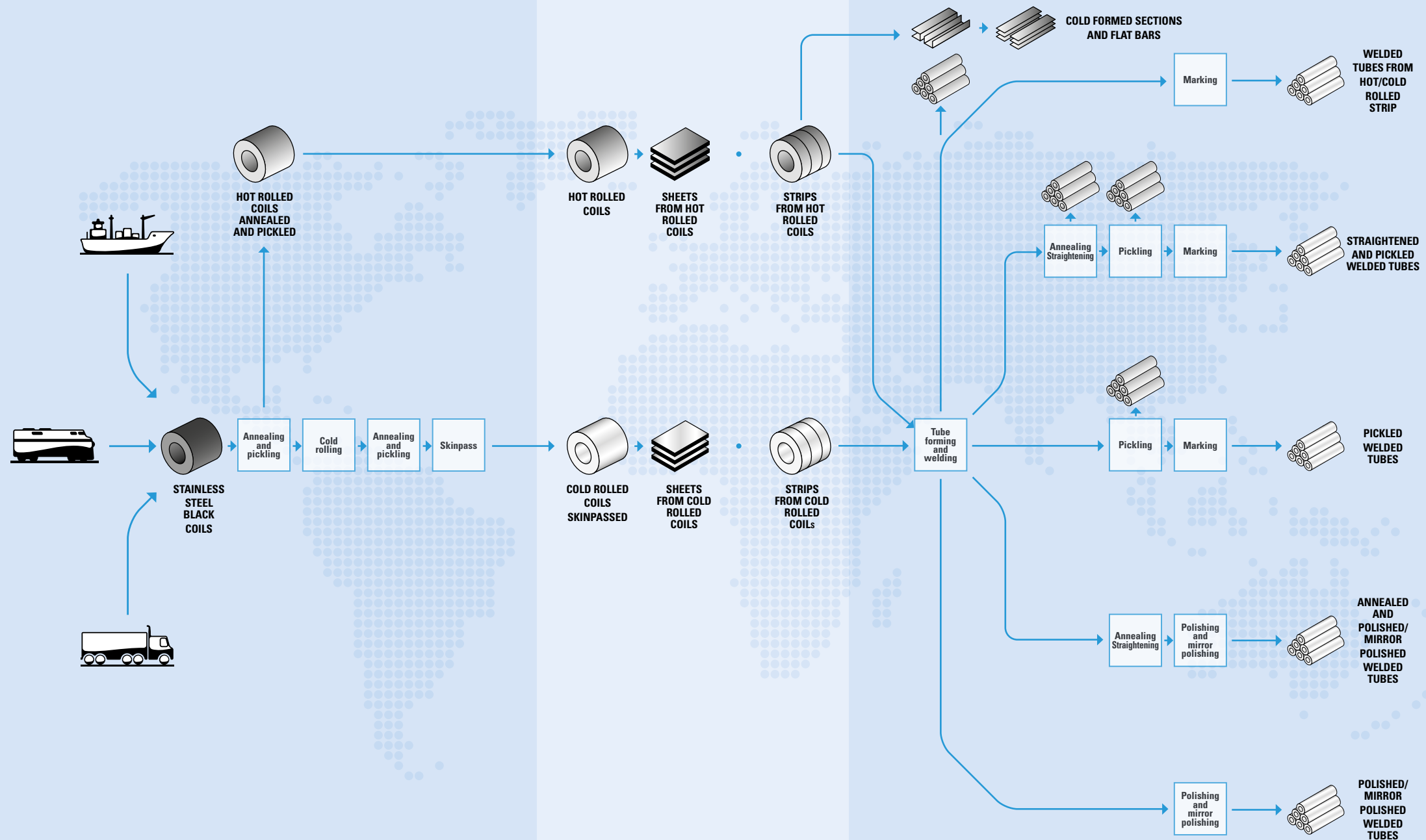


# STEEL UNIQUE

# CARBON STEEL MANUFACTURING PROCESS



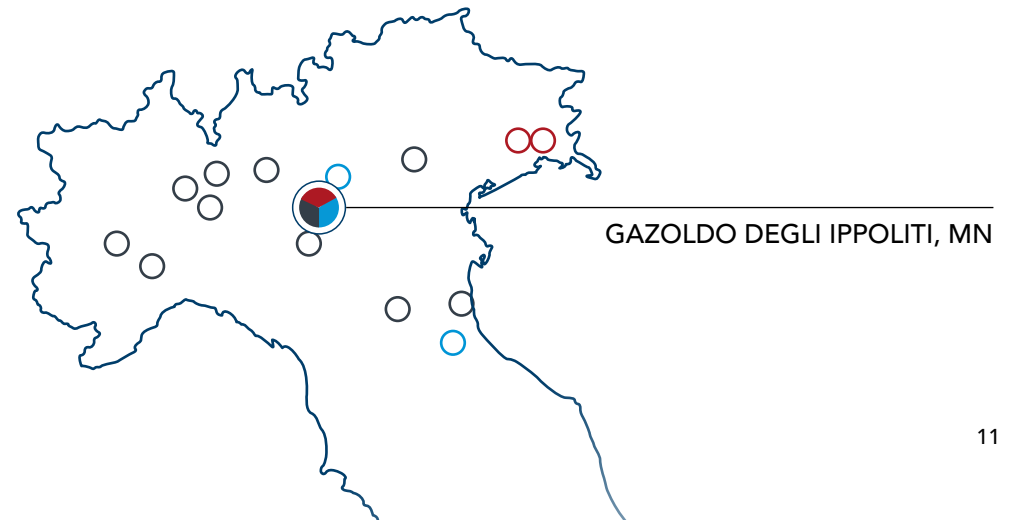
# STAINLESS STEEL MANUFACTURING PROCESS





# The plant

The history of Marcegaglia begins in **1959** in a 120 square meters craftsman shop in Gazoldo degli Ippoliti, where Steno Marcegaglia starts the manufacturing of cold formed sections for roller shutters. Shortly after, the production of **tubes** from cold rolled strip is started. Within the next two decades, the plant is completed with **carbon steel** cold rolling mills and the production of tubes from hot rolled strip.





## The plant

In the 1980s, while the group starts a huge development program in Italy and abroad, the Gazoldo plant is further expanded with the addition of flats and sections (carbon and stainless steel) and the **Headquarters** office manages all central activities related to manufacturing units and sales divisions dedicated to specific products.

The major investment plan started in 2008 included new additions to the plant, with new large units for the annealing and pickling, cold rolling and cut to length of austenitic and ferritic **stainless steels** 1D and 2B finish.



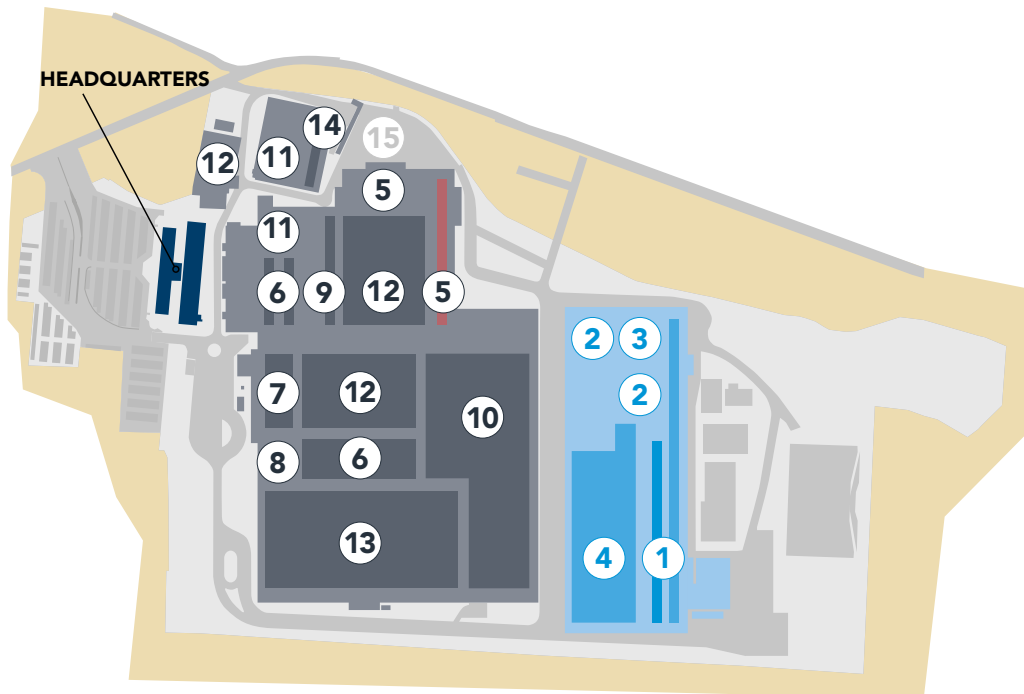
## Production areas

Marcegaglia's range of carbon steel and stainless steel products (hot rolled, cold rolled and galvanized) can match the most diverse requirements of target industries in terms of **steel grades, dimensions, thickness, tolerances and surface finish.**

The Gazoldo degli Ippoliti plant hosts manufacturing lines for the production of steel **coils, strips, sheets, flat bars, welded structural and precision tubes**, and for the execution of additional processing.

The plant also hosts the central offices dedicated to **quality control, technical services, IT and logistic management** of all the group's manufacturing units.

# Production areas



## STAINLESS STEEL

- ① Pickling
- ② Cold rolling
- ③ Annealing Furnaces
- ④ Service center

## CARBON STEEL

- ⑤ Pickling
- ⑥ Cold rolling
- ⑦ Annealing furnaces
- ⑧ Skinpass
- ⑨ Hot dip galvanizing
- ⑩ Sheets service center
- ⑪ Strips service center
- ⑫ Oscillated wound coils
- ⑬ Tube mills
- ⑭ Cold formed sections
- ⑮ Quality department



## STAINLESS STEEL

# Pickling

### PRODUCT RANGE

|                     |       |
|---------------------|-------|
| Min. width (mm)     | 1,000 |
| Max. width (mm)     | 1,500 |
| <hr/>               |       |
| Min. thickness (mm) | 0.80  |
| Max. thickness (mm) | 6.00  |
| <hr/>               |       |

production lines **2**  
manufacturing capacity (t/y) **500,000**

**Stainless steel**  
hot rolled coils  
1D finish





## STAINLESS STEEL

# Cold rolling

### PRODUCT RANGE

|                     |       |
|---------------------|-------|
| Min. width (mm)     | 1,000 |
| Max. width (mm)     | 1,500 |
| <hr/>               |       |
| Min. thickness (mm) | 0.6   |
| Max. thickness (mm) | 3     |
| <hr/>               |       |

|                              |         |
|------------------------------|---------|
| production lines             | 2       |
| manufacturing capacity (t/y) | 250,000 |

**Stainless steel**  
cold rolled coils  
2B finish



## STAINLESS STEEL

# Service center

New **cut-to-length lines with automated packaging** complete Marcegaglia's range of services in the sector of stainless steel hot rolled and cold rolled flat products.

thickness (mm)

0.3 / 6

width (mm)

1,500

**Stainless steel sheets, flat bars, narrow strips**



## CARBON STEEL

# Pickling

### PRODUCT RANGE

|                 |       |
|-----------------|-------|
| Max. width (mm) | 1,500 |
|-----------------|-------|

|                     |     |
|---------------------|-----|
| Min. thickness (mm) | 1.5 |
|---------------------|-----|

|                     |   |
|---------------------|---|
| Max. thickness (mm) | 5 |
|---------------------|---|

|                 |   |
|-----------------|---|
| production line | 1 |
|-----------------|---|

|                              |         |
|------------------------------|---------|
| manufacturing capacity (t/y) | 600,000 |
|------------------------------|---------|

### Carbon steel pickled coils

Dry or oil pickled, potentially trimmed and/or skinpassed



## CARBON STEEL

# Cold rolling

### PRODUCT RANGE

**Min. width (mm)** 300

**Max. width (mm)** 800

**Min. thickness (mm)** 0.25

**Max. thickness (mm)** 4

production lines 4

manufacturing capacity (t/y) 400,000

**Carbon steel cold rolled coils and strips**  
with special tolerances upon request



## CARBON STEEL

# Annealing and skinpass

|                              |         |
|------------------------------|---------|
| annealing bases              | 28      |
| manufacturing capacity (t/y) | 280,000 |



|                              |         |
|------------------------------|---------|
| skinpassing lines            | 2       |
| manufacturing capacity (t/y) | 370,000 |



CARBON STEEL

# Hot dip galvanizing

## PRODUCT RANGE

Min. width (mm) 350

Max. width (mm) 745

Min. thickness (mm) 0.6

Max. thickness (mm) 3.65

production line 1

manufacturing capacity (t/y) 75,000

## Galvanized coils and strips

Surface finish: normal, minimized, skinpassed spangle



## CARBON STEEL

### Service center

|                              |          |
|------------------------------|----------|
| cut-to-length lines          | 9        |
| manufacturing capacity (t/y) | 270,000  |
| thickness (mm)               | 0.5 / 15 |
| max width (mm)               | 2,000    |

### **Carbon steel black sheets, pickled, cold rolled, hot dip galvanized, diamond, teardrop patterned**

|                              |            |
|------------------------------|------------|
| slitting lines               | 22         |
| manufacturing capacity (t/y) | 800,000    |
| thickness (mm)               | 0.25 / 6   |
| width                        | 12 / 1,550 |

### **Carbon steel strips, pickled, cold rolled, hot dip galvanized**



## CARBON STEEL

# Tube mills

### PRODUCT RANGE

|                     |     |
|---------------------|-----|
| Min. diameter (mm)  | 8   |
| Min. thickness (mm) | 0.5 |

|                                    |         |
|------------------------------------|---------|
| tube mills from hot rolled strips  | 4       |
| tube mills from cold rolled strips | 22      |
| dedicated slitting lines           | 4       |
| manufacturing capacity (t/y)       | 350,000 |

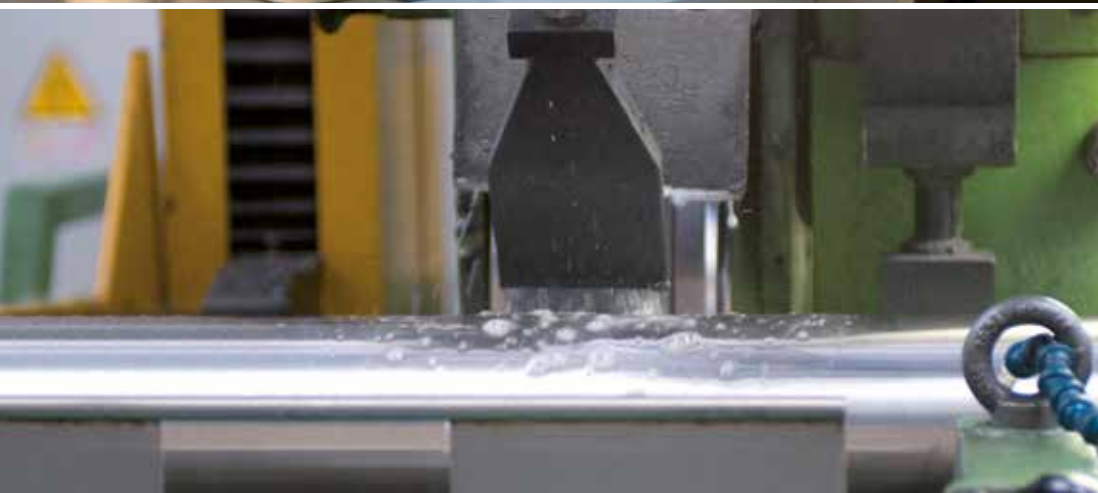


CARBON STEEL

## Tube mills

### Optional processing

- Suitability for subsequent galvanizing
- Additional heat treatments
- Weld seam removing
- Special end finishing
- Cut to length
- Customer defined marking
- Restricted tolerances
- Welding position
- Specific corrosion protection
- Specific packaging method
- Hot galvanization



# Quality

The Quality Management Systems of the production plant, Headquarter offices and building technical offices at Gazoldo degli Ippoliti are **ISO 9001:2015** certified.

Other certifications include:

- CE marking for non-alloy **structural steels** (**EN 10025**)
- CE marking for stainless steel flat products for **construction purposes** (**EN 10088-4**)
- CE marking for **structural tubes** according to EU directive 89/106/EEC (**EN 10219**)
- **AD 2000 W2/W10** for stainless steel flat products for **pressure purposes** according to EU directive 97/23/EC

November 2020

# OUR STEEL BRINGS YOUR WORLD TO LIFE



**HEADQUARTERS**

via Bresciani, 16 • 46040 Gazoldo Ippoliti, Mantova - Italy  
[www.marcegaglia.com](http://www.marcegaglia.com)

60<sup>th</sup>  
1959-2019  
**MARCEGAGLIA**

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## Marcegaglia Specialties pickling line out for 2-3 months due to fire, cold-rolled stainless coils affected

Italian stainless steel re-roller Marcegaglia Specialties reported a fire at one of its flat product pickling lines on Thursday October 14 and will be out of action for two to three months, a company source told Fastmarkets on October 15.

The pickling line, which is located at the company headquarters in Gazoldo Degli Ippoliti in northern Italy, has a capacity of 15,000 tonnes per month.

The company has a...

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### Imports of stainless Slabs from Indonesia in Turkey

| TURKEY IMPORTS - SLABS FROM INDONESIA |       |               |                   |
|---------------------------------------|-------|---------------|-------------------|
| year                                  | month | MT            | EUR/MT            |
| 2021                                  | 1     |               |                   |
|                                       | 2     | 10.103        | 1.505             |
|                                       | 3     |               |                   |
|                                       | 4     | 10.040        | 1.505             |
|                                       | 5     |               |                   |
|                                       | 6     | 10.141        | 1.759             |
|                                       | 7     |               |                   |
|                                       | 8     | 20.317        | 1.850             |
|                                       | 9     |               |                   |
|                                       | 10    |               |                   |
|                                       | 11    | 10.083        | 2.284             |
|                                       | 12    |               |                   |
| <b>Total</b>                          |       | <b>30.284</b> | <b>48.156.921</b> |
| Per Unit                              |       |               | 1590              |

### Exports of black SSHR from Turkey to Italy

| TURKEY EXPORTS - HR COIL TO ITALY |       |               |                   |
|-----------------------------------|-------|---------------|-------------------|
| year                              | month | MT            | EUR/MT            |
| 2021                              | 1     |               |                   |
|                                   | 2     |               |                   |
|                                   | 3     | 4.696         | 1.594             |
|                                   | 4     | 5.018         | 1.617             |
|                                   | 5     | 5.156         | 1.543             |
|                                   | 6     |               |                   |
|                                   | 7     | 5.037         | 1.591             |
|                                   | 8     | 4.965         | 1.860             |
|                                   | 9     | 4.919         | 1.875             |
|                                   | 10    |               |                   |
|                                   | 11    |               |                   |
|                                   | 12    |               |                   |
| <b>Total</b>                      |       | <b>29.791</b> | <b>50.027.315</b> |
| Per Unit                          |       |               | 1.679             |

### Assessment based on import and export price in 2021

|                         |          |
|-------------------------|----------|
| Import price slab       | 1590 €/t |
| Export price black SSHR | 1679 €/t |

#### Cost share of the imported input

Slab cost **94,7%**

#### Added value of the assembly operation

Hot-rolling cost **5,3%**

\* for the purpose of the comparison, only imports matched with corresponding exports are used.

| Cost of manufacturing | EU              | Indonesia |
|-----------------------|-----------------|-----------|
| COM Slab              | [1000-3000] €/t |           |
| COM black SSHR        | [1050-3150] €/t |           |
| Slab cost             | [About 95%]     |           |
| Hot-rolling cost*     | [About 5%]      |           |

\* This includes only hot rolling because black coils do not undergo pickling and annealing

## US dollar (USD)



11 April 2022

EUR 1 = USD 1.09 +0.0039(+0.4%)

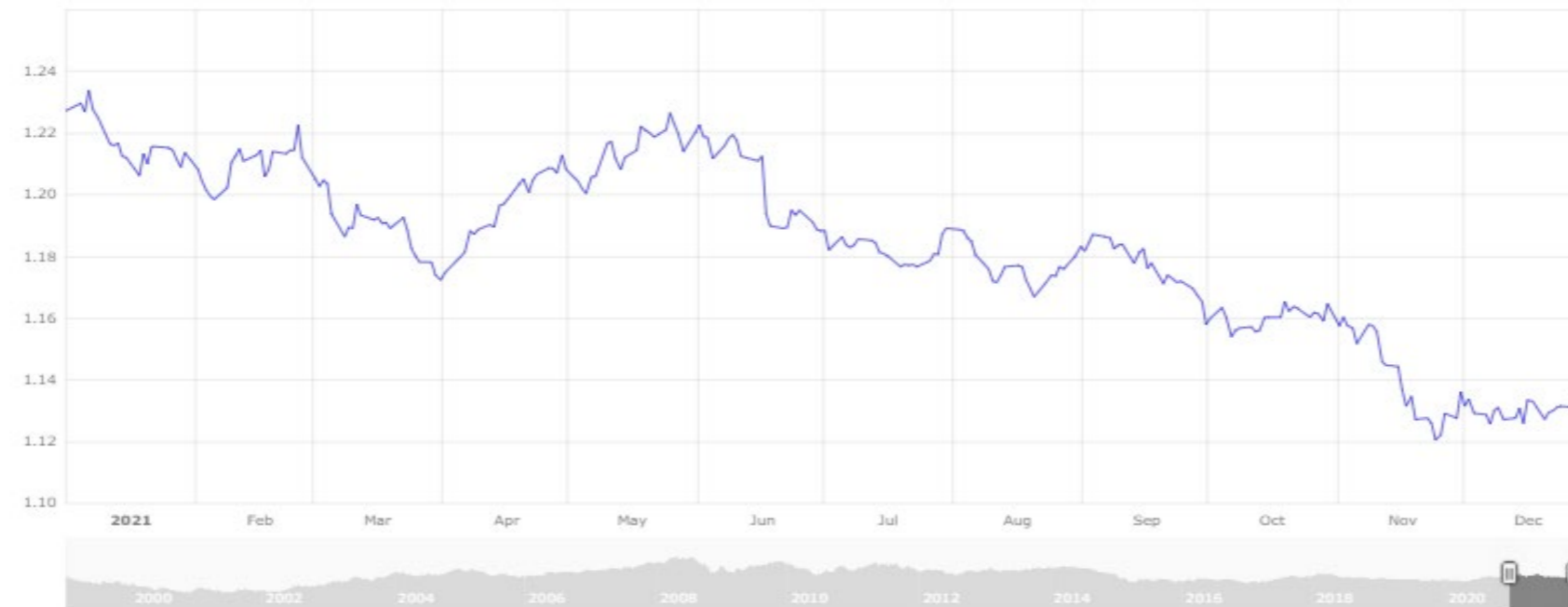
Change from 4 January 2021 to 31 December 2021

| Min (24 November 2021) | Max (6 January 2021) | Average |
|------------------------|----------------------|---------|
| 1.1206                 | 1.2338               | 1.1827  |

Select: EUR vs. USD

Period: 01/01/2021 31/12/2021

Zoom: 1m 6m 1y 10y all



1 EUR 1,1827 USD  
1 USD 0,84552296 EUR

Please also refer to Annex 4

Sensitive information on costs relating to companies internal data and intelligence

## **SUPPORTING ELEMENTS ON UNDERMINING OF THE REMEDIAL EFFECT**

### **1. INFORMATION ON NICKEL COSTS**

Refer to document: Variation of nickel prices

### **2. INFORMATION ON TRANSPORTATION COSTS**

*[This section refers to confidential information given in other annexes. This includes freight rates between Indonesia and the EU, Indonesia and Turkey and Turkey and the EU This document also compares the different transport costs, showing that it is inefficient to reroute SSHR going from Indonesia to the EU via Turkey.]*

*Indonesia - EU: [50-100] USD*

*Indonesia- Turkey: [60-130] USD*

*Turkey - EU: [10-60] USD*

*Indonesia - EU via Turkey: [70-190] USD*

*Difference = [20-90] USD*

*[Another sensitive annex contains detailed information on freight rates]*

### **3. INFORMATION ON THE SHARE OF NICKEL IN SSHR**

Refer to document: Nickel share assessment 2021

***Assessment based on cost of manufacturing (excluding SG&A, profits)***

|                               | EU                     | Indonesia              |
|-------------------------------|------------------------|------------------------|
| <b>COM black SSHR</b>         | sensitive              | sensitive              |
| <b>Nickel cost</b>            | sensitive              | sensitive              |
| <b><i>Share of nickel</i></b> | <b><i>[30-60]%</i></b> | <b><i>[30-60]%</i></b> |

Sensitive information relating to the costs of production and

[https://www.westmetall.com/en/markdaten.php?action=averages&field=LME\\_Ni\\_cash](https://www.westmetall.com/en/markdaten.php?action=averages&field=LME_Ni_cash)

# Nickel

2022

| Month    | LME Nickel Cash-Settlement |      |           |
|----------|----------------------------|------|-----------|
| April    | 33.442,14                  | 2022 | 27.968,34 |
| March    | 31.927,22                  | 2021 | 18.477,99 |
| February | 24.178,00                  | 2020 | 13.773,18 |
| January  | 22.326,00                  | 2019 | 13.906,96 |
|          |                            | IP   | 12.341,83 |

# Nickel

2021

| Month     | LME Nickel Cash-Settlement |
|-----------|----------------------------|
| December  | 20.070,24                  |
| November  | 19.964,32                  |
| October   | 19.420,24                  |
| September | 19.398,41                  |
| August    | 19.160,43                  |
| July      | 18.817,05                  |
| June      | 17.943,23                  |
| May       | 17.605,74                  |
| April     | 16.480,70                  |
| March     | 16.459,87                  |
| February  | 18.568,05                  |
| January   | 17.847,60                  |

| in USD/ tonne | IP     | 2019   | 2020   | 2021   | 2022   |
|---------------|--------|--------|--------|--------|--------|
| Nickel LME    | 12.342 | 13.907 | 13.773 | 18.478 | 27.968 |
| Index         | 100    | 113    | 112    | 150    | 227    |

# Nickel

2020

| Month     | LME Nickel Cash-Settlement |
|-----------|----------------------------|
| December  | 16.807,05                  |
| November  | 15.796,05                  |
| October   | 15.219,36                  |
| September | 14.866,27                  |
| August    | 14.486,85                  |
| July      | 13.341,35                  |
| June      | 12.703,27                  |
| May       | 12.135,32                  |
| April     | 11.753,20                  |
| March     | 11.873,00                  |
| February  | 12.743,50                  |
| January   | 13.552,95                  |

# Nickel

2019

| Month     | LME Nickel Cash-Settlement |
|-----------|----------------------------|
| December  | 13.800,50                  |
| November  | 15.199,52                  |
| October   | 17.113,48                  |
| September | 17.673,10                  |
| August    | 15.682,14                  |
| July      | 13.462,39                  |
| June      | 11.970,00                  |
| May       | 11.998,33                  |
| April     | 12.819,00                  |
| March     | 13.060,71                  |
| February  | 12.649,75                  |
| January   | 11.454,55                  |

# Nickel

2018

| Month     | LME Nickel Cash-Settlement |
|-----------|----------------------------|
| December  | 10.836,84                  |
| November  | 11.253,41                  |
| October   | 12.327,17                  |
| September | 12.527,25                  |
| August    | 13.432,95                  |
| July      | 13.772,05                  |
| June      | 15.110,95                  |
| May       | 14.356,43                  |
| April     | 13.934,50                  |
| March     | 13.403,57                  |
| February  | 13.576,75                  |
| January   | 12.880,23                  |

## Prices & volumes

| IP  |        | Source   |
|---|--------|--|
| Indonesia Volume (tonnes)                   | 111512 | <i>table 5 prov. AD Reg.</i>                   |
| Indonesia Price (EUR/ tonnes)               | 1645   | <i>table 6 prov. AD Reg.</i>                   |
| EU Price (EUR/ tonnes)                      | 1991   | <i>table 11 prov. AD Reg.</i>                  |
| EU Cost (EUR/ tonnes)                       | 1894   | <i>table 11 prov. AD Reg.</i>                  |
| EU target price (profit only) (EUR/ tonnes) | 2074   | <i>profit 8,7% as per rec. 233 def AD Reg.</i> |

| 2021                                       |        | Source         |
|--|--------|----------------|
| Price of imports from Turkey (EUR/ tonnes) | 1.693  | <i>Annex 2</i> |
| Volume of imports from Turkey (tonnes)     | 33.367 | <i>Annex 2</i> |

Share of Turkish volumes                      Turkey 21/ Indonesia IP  
29,9%

## Undercutting

Undercutting                                      14,96%

|                      | 2021 price | Customs duty | Undercutting |
|----------------------|------------|--------------|--------------|
| Turkish import price | 1.693      | 0%           | 14,96%       |

## Underselling

Underselling (+8,7% target profit)                      22,52%

|                      | 2021 price | Customs duty | Underselling |
|----------------------|------------|--------------|--------------|
| Turkish import price | 1.693      | 0%           | 22,52%       |

## Dumping

Dumping margin 17,70%

### Source

rec. 75 def. AD Reg.

Numbers original investigation (price of imports from Indonesia)

| 2016  | 2017  | 2018  | IP (July '18-June '19) |
|-------|-------|-------|------------------------|
| 2.203 | 2.152 | 1.688 | 1.645                  |

table 6 prov. AD Reg.

|                          |       |           |
|--------------------------|-------|-----------|
| Amount of dumping        | 291   | EUR/tonne |
| minimum non-dumped price | 1.936 | EUR/tonne |

| Average import price<br>(EUR/unit) | 2021 | Dumping  |        |
|------------------------------------|------|----------|--------|
|                                    |      | EUR/unit | in %   |
| Turkey                             | 1693 | 244      | 14,39% |

Annex 2