

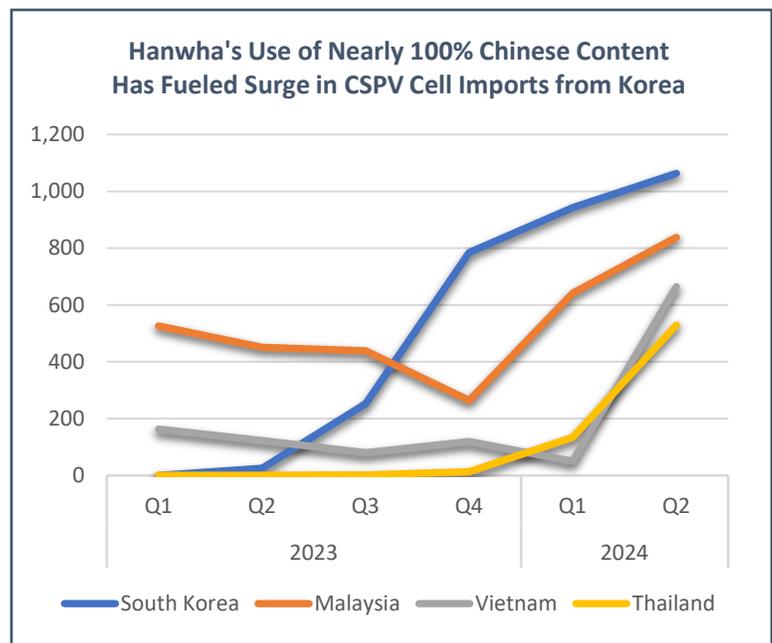


LEVELING THE PLAYING FIELD PRIORITIZES DOMESTIC MANUFACTURING, RELIABLE AND RESPONSIBLE SUPPLY CHAINS, AND ENERGY INDEPENDENCE

Korean *chaebol* Hanwha Group is circumventing the antidumping and countervailing duty orders on solar cells from China by exporting cells assembled in South Korea from substantial Chinese-origin inputs to the USA.

Hanwha’s Trade Remedy Avoidance Track Record

- Prior to the original China AD/CVD Orders, Hanwha’s manufacturing presence was in China.
- In 2012, instead of trading fairly, Hanwha acquired Germany-based Q CELLS (including its production operations in Germany and Malaysia) and bragged of supplying solar modules “free of trade sanctions.”
- In 2014-2015, Hanwha engaged in a series of acquisitions and corporate restructuring “to avoid U.S. tariffs on China-made products.”
- Hanwha built a module facility and headquarters in South Korea, with the express purpose of “avoid{ing} the high rate of anti-dumping duties imposed on solar modules produced in China.”
- Hanwha strongly advocated for expansion of tariff free cell imports under safeguard remedy.



Under U.S. Trade Law, Hanwha Is Circumventing:

1. Because all of Hanwha’s upstream manufacturing steps including wafer occur in China and Hanwha uses Chinese-origin inputs, Hanwha’s Korean cell processing is minor and insignificant in terms of value of the solar cells and value-add.
2. Hanwha’s R&D expenses and investments in Korea are minor compared to R&D activity in China.
3. Hanwha’s Korean cell assembly process is simple relative to complex upstream Chinese operations.
4. Hanwha’s Korean production footprint is small compared to Chinese polysilicon and ingot/wafering operations.

Public interest is served in the strong enforcement of the trade laws:

- ➔ Hanwha will never sell its solar cells into the merchant market.
- ➔ Hanwha’s new case excludes Korean solar cells.
- ➔ Fair trade is when all trade subject to the same rules.

American M.A.D.E. is a coalition dedicated to strengthening the clean energy supply chain, driving high-quality jobs, cementing U.S. energy independence, and enhancing national and economic security in clean energy.