

### **General Questions**

Thank you for including us in your consultation on the ICIS pricing methodology, herewith the focus on PVC and related markets.

We've gone through your questionnaire and would like to make comments/ask questions with regard to it (questions 1-4) as the information provided in your leaflet is not quite clear to enable an adequate response:

In order to understand your methodology, we would like to know, how your actual method is working resp. how your process to gather information and the corresponding analysis is working? Which parameters are influencing your results/conclusions? Who is being interviewed and what is the relevant share of the different stakeholders in pricing? Which converters and/or traders/distributors are interviewed in addition to the producers? How are you weighing the different groups in your assessment?

From our point of view, a detailed analysis of the specific prices is not really necessary as we are mainly looking at the changes from period to period. Detailed prices are very limited to be compared as the gross and net level is changing from customer to customer. And: net pricing is not in our interest of being published.

With regard to question 5, this question is implying that only traders/distributors are relevant in export business. Do you think that is a realistic situation?

From our point of view, you have to differentiate between Turkey /Egypt and France/Italy/Spain in PVC. The first are typical spot markets, whereas the latter are usually contract price markets.

Looking at question 7, we are wondering why a question to ChlorAlkali market is being included in PVC pricing. Anyhow, looking at the Caustic Soda export prices, there are differences with regard to the regional markets, influenced by the local market environment and to some extent by different logistic costs. These factors play a bigger role in pricing than the lot size itself.

