

Counterparty Verification Report — Tianjin Pipe (Group) Corporation

Open-source manufacturing footprint check (demonstration report)

26 August 2026

Subject	Tianjin Pipe (Group) Corporation / 天津钢管集团股份有限公司 (TPCO)
USCI (统一社会信用代码)	91120000104313327L
Report date / ID	26 August 2026 · DEMO-TPCO-20260826
Tier	Open-source check (free tier)
Prepared for	Importer / purchasing counterparty (demonstration copy)

1. Summary verdict

Question	Finding
Manufacturing evidence	FOUND — independent, mutually consistent evidence of an operating steel-pipe production site at the registered address (environmental permit, mapped industrial polygon with satellite imagery, and repeated “producer / exporter” designations by US, EU and Canadian trade-remedy authorities).
Identity match (name ↔ USCI ↔ address)	CONFIRMED via GLEIF LEI record (LEI 300300N90V1EDSLT0I36). USCI passes the GB 32100-2015 structural check.
Sanctions / watchlists	NO MATCH on OFAC SDN, OFAC non-SDN consolidated, EU consolidated list, UK OFSI, US Consolidated Screening List (incl. BIS Entity List, MEU, UVL, CMIC). UFLPA Entity List: source page not reachable from EU; no Federal Register notice links the entity to the UFLPA list.
Trade-remedy exposure	HIGH — subject to US AD/CVD orders on OCTG (A-570-943 / C-570-944) and seamless pipe (C-570-957), Canadian SIMA measures (seamless casing, OCTG), and EU AD duty on large-diameter seamless pipes (Reg. 2023/1450). Relevant for landed-cost and customs planning, not a sign of impropriety.
Mainland registry status	NOT DETERMINABLE from EU — mainland registry (GSXT) not accessible from EU; commercial registry data (shareholders, capital, legal representative, litigation) available in the paid tier.

Important entity note. The strongest physical evidence (environmental permit, plant polygon, domain registration, EU 2023 producer listing) is held by **Tianjin Pipe Manufacturing Co., Ltd.** / 天津钢管制造有限公司 (**USCI 91120110566114496B**), an entity at the same address that presents itself as the operating company of the TPCO group. The group entity **Tianjin Pipe (Group) Corporation** itself is designated as producer/exporter by US and EU authorities. A contract signed with one of these entities is not automatically a contract with the other; see Section 7.

2. Company identity

Field	Value	Source
Legal name (Chinese)	天津钢管集团股份有限公司	GLEIF LEI record [E1]
Legal name (English, as used by authorities)	Tianjin Pipe (Group) Corporation; Tianjin Pipe (Group) Co.; Tianjin Pipe Corporation; TPCO	Federal Register [E62, E63]; EU Reg. 926/2009 [E49]; CBSA [E66]
USCI	91120000104313327L — 18 characters, check digit “L” recomputed and matches; organisation-code segment 10431332-7 also passes its own check	Structural check (GB 32100-2015 / GB 11714) — see §11
Registration authority code	RA000092 (mainland China SAMR registry, as recorded by GLEIF)	GLEIF [E1]
Legal form	ECAK (GLEIF entity-legal-form code; joint-stock company form)	GLEIF [E1]
Registered address (GLEIF)	天津市东丽区津塘路, 东丽区, CN-TJ	GLEIF [E1]
Registered address (client-supplied)	No. 396 Jintang Road, Dongli District, Tianjin 300301	Client input
Operating-site address (permit)	天津市东丽区津塘公路396号 (No. 396 Jintang Highway, Dongli District) — matches the client-supplied street number and district	permit.mee.gov.cn [E16]
LEI	300300N90V1EDSLT0I36 — entity status ACTIVE; LEI registration status LAPSED (last LOU update 2023-02-21; renewal due 2024-02-21 not performed). A lapsed LEI means the record has not been re-verified since 2023; it does not mean the company ceased to exist.	GLEIF [E1]
Data-quality note	GLEIF postal code “100000” is a Beijing code and is inconsistent with the Tianjin address; the reverse-geocoded postcode for the site is 300301, matching the client input.	GLEIF [E1]; Nominatim [E77]

3. Registry & status

Mainland registry (GSXT) not accessible from EU; commercial registry data available in the paid tier.

Source	Result
gsxt.gov.cn (National Enterprise Credit Information Publicity System)	HTTP 403 from EU IP [E13]
creditchina.gov.cn	HTTP 412 from EU IP [E14]
zxgk.court.gov.cn (court enforcement)	HTTP 403 from EU IP [E15]

Source	Result
GLEIF (secondary, LOU-verified against RA000092)	Name, USCI and address corroborated (“FULLY_CORROBORATED”); entity status ACTIVE as of 2023-02-21 [E1]

Not available from open sources (registry blocked from EU): registered capital, shareholders and ultimate beneficial owner, legal representative, incorporation date, business scope, administrative penalties, court judgments, dishonest-debtor status, operating-status changes after February 2023.

4. Manufacturing footprint

4.1 Pollutant discharge permit (排污许可证)

The national pollutant-discharge permit platform of the Ministry of Ecology and Environment was queried by name (天津钢管) and by the group USCI.

Permit holder	Permit no.	Industry class	Site address	Validity	Mgmt. class
天津钢管制造有限公司 (Tianjin Pipe Manufacturing Co., Ltd.)	91120110566114496B001P	黑色金属冶炼和压延加工业 (ferrous metal smelting and rolling)	天津市东丽区津塘公路396号	2024-04-24 to 2029-04-23 (first issued 2017-10-31)	重点管理 (key management — the strictest tier)
天津钢管公司东丽排水管理处 (TPCO Dongli drainage office)	12120110401254984G001Y	污水处理及其再生利用 (wastewater treatment)	天津市东丽区津塘公路十号桥李庄工业区	2025-02-28 to 2030-02-27	简化管理
天津钢管三圆管材有限公司 (registration-tier record)	91120110103754892P001P	钢压延加工 (steel rolling)	Tianjin	registered 2019-06-13	registration only

Sources: [E12, E16, E17, E19]. Search by the group USCI 91120000104313327L returned no permit [E18]: the permit is issued to the operating subsidiary, not to the group holding entity. Issuing authority: 天津市东丽区行政审批局.

Interpretation. A “key-management” discharge permit in the ferrous-metal smelting/rolling class at the exact street address is direct regulatory evidence of an operating heavy-industry site. It is issued only to a unit that actually discharges pollutants at that location.

4.2 Geolocation and satellite imagery

Item	Result	Source
OpenStreetMap feature	Way 1284312858, landuse=industrial, name=天津钢管制造有限公司, centroid 39.0310 N, 117.4841 E ; adjacent way 1284312846 name=天津钢管制铁有限公司 (Tianjin Pipe Iron Manufacturing) at 39.0253 N, 117.4959 E	Overpass [E70]; OSM API [E78]
Polygon extent	approx. 117.4736–117.4946 E × 39.0197–39.0423 N ≈ 1.8 km × 2.5 km (order of 4 km ²)	Nominatim [E71]

Item	Result	Source
Reverse geocode of centroid	“天津钢管制造有限公司, 无瑕街道, 东丽区, 天津市, 300301” — postcode matches client input	Nominatim [E77]
Road name variants	津塘路 / 津塘公路 / 京滨线 (津塘公路) are the same trunk road (Jintang Road / Jingbin line) running through Dongli District [E72]; the discrepancy between “Jintang Road” and “Jintang Highway” is a naming variant, not a different location	Nominatim [E72]
Satellite tile (ESRI World Imagery, z13, tile 6769/3129)	Dense industrial belt along a highway/rail corridor; multiple very large rectangular roofed halls; agricultural land immediately to the north	[E73]
Satellite tile (ESRI World Imagery, z15, tile 27077/12519)	Long saw-tooth-roof production halls several hundred metres in length, open stockyards, internal road grid — a pattern consistent with a steel-pipe works, not with an office park or residential area	[E75]
Map tile (OSM, z15)	Label “天津钢管制造有限公司” rendered over the industrial polygon	[E76]
Address classification	Industrial zone (heavy industry). Not an office building, not residential, not a business-centre address.	Analyst reading of [E73, E75, E76]

Links for independent viewing: OSM <https://www.openstreetmap.org/way/1284312858> · imagery https://server.arcgisonline.com/ArcGIS/rest/services/World_Imagery/MapServer/tile/15/12519/27077.

Caveat: the OSM name label was added by a volunteer contributor (way version 2, 2025-08-06). It is used here only because it is corroborated by the government permit address and the site’s own street address.

4.3 Self-description (company website, low evidential weight)

The company website states annual capacity of 3.5 million tonnes of seamless pipe, ISO 14001 / OHSAS 18001 certification, and product lines covering OCTG, line pipe, offshore structural pipe, drill pipe, boiler tube and cylinder tube [E58, E60]. Self-published claims are recorded but not relied on for the verdict.

5. Trade & antidumping record

Designation of the entity as **producer** / **exporter** by foreign trade-remedy authorities is treated as strong evidence of manufacturing, because those authorities verify production facilities and cost data on site.

5.1 United States (Department of Commerce, Federal Register)

Notice	Date	Case	How the entity appears	Rate
OCTG from China: Final Results of Expedited Third Sunset Review (CVD)	2026-04-15, FR Doc. 2026-07310	C-570-944	Table “Producers/exporters”: “Tianjin Pipe (Group) Co., Tianjin Pipe Iron Manufacturing Co., Ltd., Tianguan Yuantong Pipe Product Co., Ltd., Tianjin Pipe International Economic and Trading Co. Ltd., and TPCO Charging Development Co. Ltd”	20.90 % [E62]
OCTG from China: Continuation of AD and CVD Orders	2026-06-23, FR Doc. 2026-12570	A-570-943 / C-570-944	Order continued (title-level evidence; entity-level text not extracted)	— [E34]
Seamless Carbon & Alloy Steel Standard, Line and Pressure Pipe from China: sunset review (CVD)	2021-06-03, FR Doc. 2021-11671	C-570-957	“Manufacturers/producers/exporters”: same five-entity group	8.24 % [E63]
Same product, earlier sunset review	2016-02-04, FR Doc. 2016-02147	C-570-957	“Manufacturers/Producers/Exporters”: same five-entity group	13.66 % [E65]

The Federal Register full-text search for “Tianjin Pipe” returns 46 documents (2013–2026) and for “A-570-943” 81 documents [E33, E34]; only the four above were read in full.

5.2 European Union (Official Journal via Publications Office)

Act	Status	How the entity appears
Council Regulation (EC) No 926/2009 — definitive AD duty on seamless pipes and tubes of iron or steel from China	Repealed by Reg. (EU) 2021/1053 [E86]	Annex “List of cooperating producers referred to in Article 1(2) under TARIC additional code A950”: “Tianjin Pipe (Group) Corporation (TPCO), Tianjin”. Recital (6): verification of the transaction listing of “Tianjin Pipe International Economic & Trading Corporation” [E49]
Commission Implementing Regulation (EU) 2015/2272 — expiry review of the above	Repealed 2021 [E86]	Same annex listing, TARIC A950 [E50]
Commission Implementing Regulation (EU) 2023/1450 — definitive AD duty on seamless pipes >406.4 mm from China (expiry review)	In force	Annex “cooperating exporting producers not sampled”: “Tianjin Pipe Manufacturing Co., Ltd — TARIC additional code C998” [E88]

Act	Status	How the entity appears
Commission Implementing Regulation (EU) 2024/1475 — AD duty on stainless seamless pipes from China	In force (product not made by TPCO's mainline)	Recital: “one of the major Chinese seamless steel pipes producers, Tianjin Pipe Corporation (TPCO), located in the municipality of Tianjin in Northern China, is a state-owned company” [E87]

5.3 Canada (CBSA, SIMA measures in force)

Measure	How the entity appears
Seamless casing (case “SC”)	Exporter row: “Tianjin Pipe Corporation 781449905RM0001 2008-02 2025-01” (normal-value table) and “Tianjin Pipe Corporation 781449905RM0001 183.75 2008-02 2015-12” (historic margin table) [E66]
Oil country tubular goods 1 (OCTG1)	Exporter row: “Tianjin Pipe Corporation 781449905RM0001 2015-12 2025-01” [E67]

781449905RM0001 is a CBSA business number issued to the exporter for SIMA purposes.

5.4 India (DGTR)

Not determinable from open sources: the DGTR site search returns the search form without results and the direct search path returns HTTP 404 [E51, E84]. No claim is made about Indian measures.

5.5 Reading of the trade record

Three separate authorities on three continents, over 2008–2026, have classified this group as a producer/exporter of seamless pipe and OCTG. The US notices consistently treat five Tianjin Pipe entities as one cross-owned respondent, which supports (but, absent registry data, does not prove) common ownership of the Group, the Manufacturing company, the Iron Manufacturing company and the International Economic & Trading company.

6. Sanctions & watchlists

Screening method: full list downloads on 26 Aug 2026, case-insensitive substring search on “tianjin pipe”, “tpco”, “天津钢管”, “tianjin steel pipe” across name and alias columns, plus manual review of all Tianjin-addressed hits.

List	Version / size	Result	Source
OFAC SDN (sdn.csv)	19,313 rows	No match (Tianjin-addressed hits are unrelated entities, e.g. trading and metal-materials companies under NPWMD / RUSSIA-EO14024)	[E25]
OFAC consolidated non-SDN (cons_prim.csv)	480 rows	No match	[E26]
EU consolidated financial sanctions list (FSF CSV, generated 05/08/2026)	26,053 rows	No match	[E27]

List	Version / size	Result	Source
UK OFSI consolidated list (ConList.csv)	19,762 rows	No match	[E28]
US Consolidated Screening List (trade.gov) — SDN, BIS Entity List (3,419), Denied Persons, Unverified List, Military End User, Non-SDN CMIC, SSI, ISN, DTC	43,851 rows	No match (no row with both “tianjin” and “pipe”)	[E30]
BIS Entity List (eCFR direct)	—	eCFR API unavailable (404/503) at run time; covered via the CSL above	[E31, E43]
UFLPA Entity List (DHS)	—	dhs.gov and cbp.gov return HTTP 403 from EU (three attempts) [E29, E41, E42, E85]. Fallback: Federal Register full-text search for “UFLPA Entity List” + “Tianjin Pipe” returns 0 documents [E52]; “Entity List” + “Tianjin Pipe” returns 0 documents [E53]. Partial coverage — verify against the DHS page from a non-EU network before relying on it.	

Ownership context relevant for screening: the European Commission describes TPCO as a state-owned company (Reg. 2024/1475 recital) [E87]. State ownership is not a sanctions designation; it is noted because some clients apply enhanced due diligence to SOEs.

7. Group structure & offshore vehicles

Item	Finding	Source
Related entities named by authorities	Tianjin Pipe (Group) Corporation; Tianjin Pipe Manufacturing Co., Ltd. (天津钢管制造有限公司, USCI 91120110566114496B); Tianjin Pipe Iron Manufacturing Co., Ltd. (天津钢管制铁有限公司); Tianjin Pipe International Economic & Trading Co., Ltd. (天津钢管国际经济贸易有限公司); Tianguan Yuantong Pipe Product Co., Ltd.; TPCO Charging Development Co., Ltd.; 天津钢管三圆管材有限公司	[E62, E63, E16, E19, E49, E59, E70]
Website ownership	www.tpcocom.cn carries the heading “天津钢管集团股份有限公司” but its copyright line reads “本网站由天津钢管制造有限公司版权所有” and the domain is registered to 天津钢管制造有限公司	[E58, E91]

Item	Finding	Source
Parent / shareholders	Not available from open sources — GLEIF reports no parent relationships (404 on direct-parent and ultimate-parent) [E4, E5]; no listed-company disclosure retrieved (cninfo search for 天津钢管制造 returned 0 announcements [E82]); mainland registry blocked from EU. Available in paid tier.	
Stock-exchange listing	No evidence found that the subject entity is itself listed. Not determinable further from open sources.	
Hong Kong vehicles	Not determinable in this run. The HK Companies Registry e-Search free Company Name Search requires an interactive browser session (JavaScript shell, no exposed form) [E40, E93]. GLEIF full-text search for “TPCO” returns only “TPCO Holding Corp” (Canada, LEI 254900AZOTMBFK0APG67) — a name collision with no evidence of relation [E54]; searches for 天津钢管制造 / 天津钢管国际 return no LEI [E55, E56].	
Overseas footprint (self-declared)	Website mentions joint projects in Belarus (2007), Indonesia (2009) and a US seamless-pipe plant; not independently verified here	[E58]

8. Web presence

Item	Finding	Source
Official domain	www.tpcocom.cn — registered 1997-04-03, expires 2030-07-01, registrant 天津钢管制造有限公司, registrant contact domain tpcotj.cn	WHOIS [E91]; site [E20]
ICP filing	津ICP备20000815号-1 (Tianjin ICP filing); public-security filing 津公网安备 12011002019145号 — displayed in footer with link to beian.gov.cn	[E20, E58]
Content freshness	News items dated 2026-08-26, 2026-08-21, 2026-08-20 (e.g. IATF 16949 automotive quality certification 2026-07-24; “Tianjin Cheetah Enterprise” award 2026-08-26)	[E20]

Item	Finding	Source
Export-arm site	www.tpcointernational.com — “天津钢管国际经济贸易有限公司”, English product catalogue (casing, tubing, premium connections TP-CQ/TP-G2 etc.), ICP 津ICP备09009101号-1	[E59]
Name-collision warning	tpco.com is NOT the company. It resolves to “Preiss — Student Housing Property Management Company” (USA); registered 1996 via Domains By Proxy. Any correspondence from an @tpco.com address should be treated as unrelated to the Tianjin company.	[E22, E90]
tpco.tj.cn	Used as an e-mail domain in the WHOIS contact, but www.tpco.tj.cn returns HTTP 404 (no website)	[E21, E91]
Domain ↔ name consistency	Consistent: ICP filing, WHOIS registrant and site copyright all point to 天津钢管制造有限公司 at the same group	

9. Red flags / notes

- Two-entity structure.** The operating permit, plant polygon and domain belong to Tianjin Pipe Manufacturing Co., Ltd. (USCI ...6114496B), not to the Group company (USCI ...313327L). Confirm which legal entity will sign, invoice and appear on the bill of lading; require the USCI on the contract and match it to the bank account name.
- LEI lapsed since Feb 2024.** Not a risk in itself, but the only EU-accessible identity record has not been re-verified for 2.5 years.
- Trade-remedy exposure.** OCTG and seamless pipe from this group attract AD/CVD duties in the US (A-570-943 / C-570-944 / C-570-957), Canada (SC, OCTG1) and, for >406.4 mm pipe, the EU (TARIC C998 under Reg. 2023/1450). Landed cost and origin documentation must be planned accordingly; a 2025–2026 US circumvention inquiry on OCTG from China exists [E34, titles only] and should be reviewed by customs counsel.
- State ownership** per the European Commission [E87]; some clients’ policies require enhanced due diligence for SOEs.
- Domain confusion:** tpco.com belongs to an unrelated US company (§8).
- No adverse findings** on any sanctions or export-control list screened (§6); UFLPA coverage partial.
- Address naming variant** (津塘路 vs 津塘公路) is benign; both refer to the same road.

10. Evidence appendix

Evidence IDs refer to the full request log (EVIDENCE_LOG_TPCO_20260826.md), which records every request made, including failed ones. All times UTC, 26 Aug 2026.

#	Claim	Source URL	Retrieved	Status
E1	LEI ↔ legal name ↔ USCI ↔ address; entity ACTIVE; LEI LAPSED	https://api.gleif.org/api/v1/lei-records/300300N90V1EDSLT0I36	09:58:38	200
E3	GLEIF name search 天津钢管: 4 records incl. subject	https://api.gleif.org/api/v1/lei-records?filter[entity.legalName]=天津钢管	09:58:39	200
E4/E5	No parent relationships recorded	.../300300N90V1EDSLT0I36/direct-parent, /ultimate-parent	09:58:39	404
E12	Permit search by name: 2 permit holders	POST https://permit.mee.gov.cn/perxxgkinfo/syssb/xkgg/xkgg!licenseInformation.action (registerentername=天津钢管)	09:58:48	200
E13–E15	Mainland registries blocked from EU	gsxt.gov.cn / creditchina.gov.cn / zxgk.court.gov.cn	09:58:50–55	403 / 412 / 403
E16	Permit 91120110566114496B001P, site 津塘公路396号, ferrous smelting/rolling, valid to 2029-04-23	https://permit.mee.gov.cn/perxxgkinfo/xkgkAction!xkgk.action?xkgk=getxxgkContent&dataid=840e6133dd964b15bfa57adaf34ba60	10:00:04	200
E17	Drainage-office permit at 津塘公路十号桥李庄工业区	...dataid=e18caece9c03426a85b84638b554a16e	10:00:25	200
E18	No permit under group USCI	POST ...licenseInformation.action (xkznum=91120000104313327L)	10:00:28	200 (暂无数据)
E19	Registration-tier record 天津钢管三圆管材有限公司	POST https://permit.mee.gov.cn/perxxgkinfo/syssb/xkgg/xkgg!getRegisterInfo.action	10:00:31	200
E20	Official site title, ICP 津ICP备20000815号-1, news dated Aug 2026	https://www.tpcocom.cn/	10:00:34	200
E22	tpcocom is Preiss (US student housing)	https://www.tpcocom/	10:00:37	200
E25–E28, E30	Sanctions lists downloaded and screened	treasury.gov sdn.csv; cons_prim.csv; webgate.ec.europa.eu FSF csv; ofsistorage ConList.csv; data.trade.gov consolidated.csv	10:00:46–56	200
E29, E41, E42, E85	UFLPA pages blocked from EU	https://www.dhs.gov/uflpa-entity-list ; https://www.cbp.gov/trade/forced-labor/UFLPA	10:00:56–10:05:47	403
E33/E34	FR search counts (46 / 81 docs)	https://www.federalregister.gov/api/v1/documents.json?conditions[term]=...	10:02:17	200
E49	Reg. 926/2009 annex: “Tianjin Pipe (Group) Corporation (TPCO), Tianjin”, TARIC A950; recital (6)	https://publications.europa.eu/resource/celex/32009R0926	10:03:28	200
E50	Reg. 2015/2272 same annex	https://publications.europa.eu/resource/celex/32015R2272	10:03:29	200
E52/E53	FR: 0 docs for UFLPA/Entity List + Tianjin Pipe	federalregister.gov API	10:03:30	200 (count 0)
E54	GLEIF “TPCO” → only TPCO Holding Corp (CA)	https://api.gleif.org/api/v1/lei-records?filter[fulltext]=TPCO	10:03:31	200

#	Claim	Source URL	Retrieved	Status
E58	Website “关于我们”: capacity 3.5 Mt, copyright 天津钢管制造有限公司	https://www.tpco.com.cn/gywm/index.shtml	10:03:33	200
E59	TPCO International site, ICP 津ICP备09009101号-1	http://www.tpcointernational.com/	10:03:34	200
E62	FR 2026-07310: producers/exporters group, 20.90 %	https://www.federalregister.gov/documents/full_text/xml/2026/04/15/2026-07310.xml	10:03:57	200
E63	FR 2021-11671: 8.24 %	.../2021/06/03/2021-11671.xml	10:03:57	200
E65	FR 2016-02147: 13.66 %	.../2016/02/04/2016-02147.xml	10:03:58	200
E66	CBSA seamless casing: Tianjin Pipe Corporation 781449905RM0001	https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/sc-eng.html	10:03:58	200
E67	CBSA OCTG1: same exporter	https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/octg1-eng.html	10:03:59	200
E70	OSM industrial polygons named 天津钢管制造有限公司 / 天津钢管制铁有限公司	POST https://lz4.overpass-api.de/api/interpreter	10:04:01	200
E71	Polygon bbox	https://nominatim.openstreetmap.org/search?q=天津钢管制造有限公司	10:04:07	200
E72	津塘路 = 京滨线 (津塘公路)	https://nominatim.openstreetmap.org/search?q=津塘公路 东丽区 天津	10:04:08	200
E73/ E75	ESRI World Imagery tiles z13 / z15	https://server.arcgisonline.com/ArcGIS/rest/services/World_Imagery/MapServer/tile/13/3129/6769 and .../15/12519/27077	10:05:40	200
E76	OSM map tile with label	https://tile.openstreetmap.org/15/27077/12519.png	10:05:40	200
E77	Reverse geocode: postcode 300301	https://nominatim.openstreetmap.org/reverse?lat=39.0309681&lon=117.4840887	10:05:41	200
E78	OSM way v2, edited 2025-08-06	https://www.openstreetmap.org/api/0.6/way/1284312858.json	10:05:41	200
E82	cninfo: 0 announcements	POST http://www.cninfo.com.cn/new/hisAnnouncement/query	10:05:43	200 (0 results)
E83	OP SPARQL: list of EU seamless-pipe acts 2016–2025	https://publications.europa.eu/webapi/rdf/sparql	10:05:45	200
E86	Reg. 2021/1053 repealed 2015/2272 duties	https://publications.europa.eu/resource/celex/32021R1053	10:06:17	200
E87	Reg. 2024/1475 recital: TPCO state-owned	https://publications.europa.eu/resource/celex/32024R1475	10:06:17	200
E88	Reg. 2023/1450 annex: Tianjin Pipe Manufacturing Co., Ltd — C998	https://publications.europa.eu/resource/celex/32023R1450	10:06:18	200
E90	WHOIS tpco.com: 1996, GoDaddy, Domains By Proxy	whois tpco.com	10:00	OK
E91	WHOIS tpco.com.cn: registrant 天津钢管制造有限公司, 1997-04-03	whois tpco.com.cn	10:00	OK

#	Claim	Source URL	Retrieved	Status
E92	Local warehouse: 0 rows	sqlite warehouse.sqlite	09:59	OK
E93	HK CR e-Search: JavaScript shell only	https://www.e-services.cr.gov.hk/ICRIS3EP/system/home.do	10:03	200 (no form)

11. Limitations & method

Classes of statement in this report.

- **[M] Machine-derived:** values copied verbatim from a source response (identifiers, addresses, list rows, HTTP statuses, check-digit arithmetic). Every [M] statement has an evidence-log entry.
- **[A] Analyst reading:** interpretation of machine output (satellite-image description, “same road” conclusion, the two-entity structure, the verdict). Marked as such in the text; reproducible from the cited raw files.
- **[S] Self-declared:** statements taken from the subject’s own website (capacity, certifications, overseas projects). Recorded, not relied upon.

Method notes.

- USCI check: 18-character format; check character recomputed with the GB 32100-2015 weights (1,3,9,27,19,26,16,17,20,29,25,13,8,24,10,30,28) modulo 31 over the 31-symbol alphabet; the embedded 9-digit organisation code was checked with the GB 11714 modulo-11 rule. **This is a structural validity check only; it does not prove that the number is registered or that the company exists.** Existence is corroborated separately by GLEIF (RA000092 validation).
- Mainland Chinese registries (GSXT, Credit China, court enforcement) return 403/412 to EU-based requests and were not retried. Registry-derived fields are therefore absent here and are delivered in the paid tier from a licensed commercial-registry provider.
- Sanctions screening used full-list downloads and substring matching on Latin and Chinese name variants; transliteration variants beyond those listed were not tested. Lists change daily; the result is valid for the retrieval timestamps only.
- Satellite imagery is a static tile of unknown capture date supplied by the imagery provider; it demonstrates the land use, not current activity.
- No Hong Kong company search was completed (interactive session required). No Indian DGTR result was obtained.
- All requests were made from an EU-located server between 09:58 and 10:06 UTC on 26 August 2026. Raw responses are retained.

This is not legal advice. This report is an open-source information product intended to support, not replace, the reader’s own due diligence and professional legal, customs and compliance advice.

Reviewed by: _____ (counsel) Date: _____