

**Information Return of a 25% Foreign-Owned U.S. Corporation or a
Foreign Corporation Engaged in a U.S. Trade or Business
(Under Sections 6038A and 6038C of the Internal Revenue Code)**Go to www.irs.gov/Form5472 for instructions and the latest information.

OMB No. 1545-0123

For tax year of the reporting corporation beginning , and ending .

Note: Enter all information in English and money items in U.S. dollars.

Part I Reporting Corporation (see instructions). All reporting corporations must complete Part I.

1a Name of reporting corporation <i>topmostSubform[0].Page1[0].Line1a[0].f1_5[0]</i>	1b Employer identification number Number, street, and room or suite no. (If a P.O. box, see instructions.) <i>topmostSubform[0].Page1[0].Line1a[0].f1_6[0]</i>		
City or town, state, and ZIP code (If a foreign address, see instructions.) <i>topmostSubform[0].Page1[0].Line1a[0].f1_7[0]</i>		1c Total assets \$ <i>pmostSubform[0].Page1[0].f1_9[0]</i>	
1d Principal business activity <i>topmostSubform[0].Page1[0].f1_10[0]</i>		1e Principal business activity code <i>ubform[0].Page1[0]</i>	
1f Total value of gross payments made or received reported on this Form 5472. See instructions. \$ <i>sSubform[0].Page1[0].Line1f_ReadOrder[0].f1_12[0]</i> <i>topmostSubform[0].Page1[0].f1_13[0]</i>		1g Total number of Forms 5472 filed for the tax year <i>pmostSubform[0].Page1[0].f1_15[0]</i> <i>topmostSubform[0].Page1[0].f1_16[0]</i>	
1i Check here if this is a consolidated filing of Form 5472 <input type="checkbox"/>	1j Check here if this is the initial year for which the U.S. reporting corporation is filing a Form 5472 <input type="checkbox"/>	1k Total number of Parts VIII attached to Form 5472 <i>pmostSubform[0].Page1[0].f1_15[0]</i> <i>topmostSubform[0].Page1[0].f1_16[0]</i>	1l Country of incorporation <i>topmostSubform[0].Page1[0].f1_17[0]</i> <i>topmostSubform[0].Page1[0].f1_18[0]</i>
1m Date of incorporation <i>topmostSubform[0].Page1[0].f1_17[0]</i> <i>topmostSubform[0].Page1[0].f1_18[0]</i>	1n Country(ies) under whose laws the reporting corporation files an income tax return as a resident <i>topmostSubform[0].Page1[0].f1_19[0]</i>		1o Principal country(ies) where business is conducted <i>topmostSubform[0].Page1[0].f1_19[0]</i>
2 Check here if, at any time during the tax year, any foreign person owned, directly or indirectly, at least 50% of (a) the total voting power of all classes of the stock of the reporting corporation entitled to vote, or (b) the total value of all classes of stock of the reporting corporation <input type="checkbox"/>			
3 Check here if the reporting corporation is a foreign-owned domestic disregarded entity (foreign-owned U.S. DE) treated as a corporation for purposes of section 6038A. See instructions <input type="checkbox"/>			

Part II 25% Foreign Shareholder (see instructions)Check here if any direct (or ultimate indirect) 25% foreign shareholder listed in Part II is a surrogate foreign corporation under section 7874(a)(2)(B).

4a Name and address of direct 25% foreign shareholder <i>topmostSubform[0].Page1[0].f1_20[0]</i>	4b(1) U.S. identifying number, if any <i>topmostSubform[0].Page1[0].f1_21[0]</i>	4b(2) Reference ID number (see instructions) <i>topmostSubform[0].Page1[0].f1_22[0]</i>	4b(3) Foreign taxpayer identification number (FTIN), if any (see instructions) <i>topmostSubform[0].Page1[0].f1_23[0]</i>
4c Principal country(ies) where business is conducted <i>topmostSubform[0].Page1[0].f1_24[0]</i>	4d Country of citizenship, organization, or incorporation <i>topmostSubform[0].Page1[0].f1_25[0]</i>	4e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident <i>topmostSubform[0].Page1[0].f1_26[0]</i>	
5a Name and address of direct 25% foreign shareholder <i>topmostSubform[0].Page1[0].f1_27[0]</i>	5b(1) U.S. identifying number, if any <i>topmostSubform[0].Page1[0].f1_28[0]</i>	5b(2) Reference ID number (see instructions) <i>topmostSubform[0].Page1[0].f1_29[0]</i>	5b(3) FTIN, if any (see instructions) <i>topmostSubform[0].Page1[0].f1_30[0]</i>
5c Principal country(ies) where business is conducted <i>topmostSubform[0].Page1[0].f1_31[0]</i>	5d Country of citizenship, organization, or incorporation <i>topmostSubform[0].Page1[0].f1_32[0]</i>	5e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident <i>topmostSubform[0].Page1[0].f1_33[0]</i>	
6a Name and address of ultimate indirect 25% foreign shareholder <i>topmostSubform[0].Page1[0].f1_34[0]</i>	6b(1) U.S. identifying number, if any <i>topmostSubform[0].Page1[0].f1_35[0]</i>	6b(2) Reference ID number (see instructions) <i>topmostSubform[0].Page1[0].f1_36[0]</i>	6b(3) FTIN, if any (see instructions) <i>topmostSubform[0].Page1[0].f1_37[0]</i>
6c Principal country(ies) where business is conducted <i>topmostSubform[0].Page1[0].f1_38[0]</i>	6d Country of citizenship, organization, or incorporation <i>topmostSubform[0].Page1[0].f1_39[0]</i>	6e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident <i>topmostSubform[0].Page1[0].f1_40[0]</i>	

7a Name and address of ultimate indirect 25% foreign shareholder <i>topmostSubform[0].Page1[0].f1_41[0]</i>	7b(1) U.S. identifying number, if any <i>topmostSubform[0].Page1[0].f1_42[0]</i>	7b(2) Reference ID number (see instructions) <i>topmostSubform[0].Page1[0].f1_43[0]</i>	7b(3) FTIN, if any (see instructions) <i>topmostSubform[0].Page1[0].f1_44[0]</i>
7c Principal country(ies) where business is conducted <i>topmostSubform[0].Page1[0].f1_45[0]</i>	7d Country of citizenship, organization, or incorporation <i>topmostSubform[0].Page1[0].f1_46[0]</i>	7e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident <i>topmostSubform[0].Page1[0].f1_47[0]</i>	

Part III **Related Party** (see instructions). All reporting corporations must complete this question and the rest of Part III.
 Check applicable box: Is the related party a foreign person or U.S. person?

8a Name and address of related party
 topmostSubform[0].Page2[0].f2_1[0]

8b(1) U.S. identifying number, if any topmostSubform[0].Page2[0].f2_2[0]	8b(2) Reference ID number (see instructions) topmostSubform[0].Page2[0].f2_3[0]	8b(3) FTIN, if any (see instructions) topmostSubform[0].Page2[0].f2_4[0]
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8c Principal business activity topmostSubform[0].Page2[0].f2_5[0]	8d Principal business activity code topmostSubform[0].Page2[0].f2_6[0]
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8e Relationship—Check boxes that apply: Related to reporting corporation Related to 25% foreign shareholder 25% foreign shareholder

8f Principal country(ies) where business is conducted topmostSubform[0].Page2[0].f2_7[0]	8g Country(ies) under whose laws the related party files an income tax return as a resident topmostSubform[0].Page2[0].f2_8[0]
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Part IV **Monetary Transactions Between Reporting Corporations and Foreign Related Party** (see instructions)

Caution: Part IV **must** be completed if the “foreign person” box is checked in the heading for Part III.
 If estimates are used, check here.

9 Sales of stock in trade (inventory)	9 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_9[0]
10 Sales of tangible property other than stock in trade	10 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_10[0]
11 Platform contribution transaction payments received	11 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_11[0]
12 Cost sharing transaction payments received	12 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_12[0]
13a Rents received (for other than intangible property rights)	13a <input type="checkbox"/> topmostSubform[0].Page2[0].f2_13[0]
b Royalties received (for other than intangible property rights)	13b <input type="checkbox"/> topmostSubform[0].Page2[0].f2_14[0]
14 Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	14 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_15[0]
15 Consideration received for technical, managerial, engineering, construction, scientific, or like services	15 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_16[0]
16 Commissions received	16 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_17[0]
17 Amounts borrowed (see instructions) a Beginning balance <input type="checkbox"/> topmostSubform[0].Page2[0].f2_18[0] b Ending balance or monthly average	17b <input type="checkbox"/> topmostSubform[0].Page2[0].f2_19[0]
18 Interest received	18 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_20[0]
19 Premiums received for insurance or reinsurance	19 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_21[0]
20 Loan guarantee fees received	20 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_22[0]
21 Other amounts received (see instructions)	21 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_23[0]
22 Total. Combine amounts on lines 9 through 21	22 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_24[0]
23 Purchases of stock in trade (inventory)	23 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_25[0]
24 Purchases of tangible property other than stock in trade	24 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_26[0]
25 Platform contribution transaction payments paid	25 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_27[0]
26 Cost sharing transaction payments paid	26 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_28[0]
27a Rents paid (for other than intangible property rights)	27a <input type="checkbox"/> topmostSubform[0].Page2[0].f2_29[0]
b Royalties paid (for other than intangible property rights)	27b <input type="checkbox"/> topmostSubform[0].Page2[0].f2_30[0]
28 Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	28 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_31[0]
29 Consideration paid for technical, managerial, engineering, construction, scientific, or like services	29 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_32[0]
30 Commissions paid	30 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_33[0]
31 Amounts loaned (see instructions) a Beginning balance <input type="checkbox"/> topmostSubform[0].Page2[0].f2_34[0] b Ending balance or monthly average	31b <input type="checkbox"/> topmostSubform[0].Page2[0].f2_35[0]
32 Interest paid	32 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_36[0]
33 Premiums paid for insurance or reinsurance	33 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_37[0]
34 Loan guarantee fees paid	34 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_38[0]
35 Other amounts paid (see instructions)	35 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_39[0]
36 Total. Combine amounts on lines 23 through 35	36 <input type="checkbox"/> topmostSubform[0].Page2[0].f2_40[0]

Part V **Reportable Transactions of a Reporting Corporation That Is a Foreign-Owned U.S. DE** (see instructions)

Describe on an attached separate sheet any other transaction as defined by Regulations section 1.482-1(i)(7), such as amounts paid or received in connection with the formation, dissolution, acquisition, and disposition of the entity, including contributions to and distributions from the entity, and check here.

Part VI **Nonmonetary and Less-Than-Full Consideration Transactions Between the Reporting Corporation and the Foreign Related Party** (see instructions)

Describe these transactions on an attached separate sheet and check here.

Part VII Additional Information. All reporting corporations must complete Part VII.

- 37** Does the reporting corporation import goods from a foreign related party? Yes No
- 38a** If "Yes," is the basis or inventory cost of the goods valued at greater than the customs value of the imported goods? Yes No
- b** If "Yes," attach a statement explaining the reason or reasons for such difference.
- c** If the answers to questions 37 and 38a are "Yes," were the documents used to support this treatment of the imported goods in existence and available in the United States at the time of filing Form 5472? Yes No
- 39** During the tax year, was the foreign parent corporation a participant in any cost sharing arrangement (CSA)? Yes No
If "Yes," complete Part VIII as instructed below.
- 40a** During the tax year, did the reporting corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions Yes No
- b** If "Yes," enter the total amount of the disallowed deductions \$ [\[0\].Page3\[0\].f3_1\[0\]](#)
- 41a** Is the reporting corporation claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign related party? If "Yes," complete lines 41b, 41c, and 41d. See instructions Yes No
- b** Enter the amount of gross receipts derived from all sales of general property to the foreign related party that the reporting corporation included in its computation of foreign-derived deduction eligible income (FDDEI). See instructions \$ [\[0\].Page3\[0\].f3_2\[0\]](#)
- c** Enter the amount of gross receipts derived from all sales of intangible property to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions \$ [\[0\].Page3\[0\].f3_3\[0\]](#)
- d** Enter the amount of gross receipts derived from all services provided to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions \$ [\[0\].Page3\[0\].f3_4\[0\]](#)
- 42a** Did the reporting corporation have any loan to or from the related party to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the relevant safe-haven range (100% to 130% of the applicable Federal rate (AFR) for the relevant term)? Yes No
- b** Did the reporting corporation have any loan to or from the related party to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest outside the relevant safe-haven range (100% to 130% of the AFR for the relevant term)? Yes No
- 43a** Did the reporting corporation issue a covered debt instrument in any of the transactions described in Regulations section 1.385-3(b)(2) during the tax year with respect to a related party that is a corporation, or, did the reporting corporation issue or refinance indebtedness owed to a related party that is a corporation during the 36 months before or after the date of a distribution or acquisition described in Regulations section 1.385-3(b)(3)(i) made by the reporting corporation, and either the issuance or refinance of indebtedness, or the distribution or acquisition, occurred during the tax year? Yes No
- b** If the answer to question 43a is "Yes," provide the following.
- (1) The amount of such transaction(s), distribution(s), and acquisition(s) \$ [\[0\].Page3\[0\].f3_5\[0\]](#)
- (2) The amount of such related party indebtedness \$ [\[0\].Page3\[0\].f3_6\[0\]](#)

Part VIII Cost Sharing Arrangement (CSA)

Note: Complete a separate Part VIII for each CSA in which the reporting corporation was a participant during the tax year. Report all amounts in U.S. dollars. (See instructions.)

- 44** Provide a brief description of the CSA with respect to which this Part VIII is being completed.
[topmostSubform\[0\].Page3\[0\].f3_7\[0\]](#)
[topmostSubform\[0\].Page3\[0\].f3_8\[0\]](#)
[topmostSubform\[0\].Page3\[0\].f3_9\[0\]](#)
[topmostSubform\[0\].Page3\[0\].f3_10\[0\]](#)
- 45** During the course of the tax year, did the reporting corporation become a participant in the CSA? Yes No
- 46** Was the CSA in effect before January 5, 2009? Yes No
- 47** What was the reporting corporation's share of reasonably anticipated benefits for the CSA? [age3\[0\].f3_11\[0\]](#) %
- 48a** Enter the total amount of stock-based compensation deductions claimed by the reporting corporation \$ [\[0\].Page3\[0\].f3_12\[0\]](#)
- b** Enter the total amount of deductions for the tax year for stock-based compensation that was granted during the term of the CSA and is directly identified with, or reasonably allocable to, the intangible development activity under the CSA \$ [\[0\].Page3\[0\].f3_13\[0\]](#)
- c** Was there any stock-based compensation granted during the term of the CSA to individuals who performed functions in business activities that generate cost shared intangibles that was not treated as directly identified with, or reasonably allocable to, the intangible development activity? Yes No
- 49a** Enter the total amount of intangible development costs for the CSA \$ [\[0\].Page3\[0\].f3_14\[0\]](#)
- b** Enter the amount of intangible development costs allocable to the reporting corporation based on the reporting corporation's reasonably anticipated benefits share \$ [\[0\].Page3\[0\].f3_15\[0\]](#)

Part IX Base Erosion Payments and Base Erosion Tax Benefits Under Section 59A (see instructions)

- 50** Amounts defined as base erosion payments under section 59A(d) \$ [\[0\].Page3\[0\].f3_16\[0\]](#)
- 51** Amount of base erosion tax benefits under section 59A(c)(2) \$ [\[0\].Page3\[0\].f3_17\[0\]](#)
- 52** Amount of total qualified derivative payments as described in section 59A(h) made by the reporting corporation \$ [\[0\].Page3\[0\].f3_18\[0\]](#)
- 53** Reserved for future use