



**Note:** *The draft you are looking for begins on the next page.*

## **Caution: DRAFT—NOT FOR FILING**

This is an early release draft of an IRS tax form, instructions, or publication, which the IRS is providing for your information. **Do not file draft forms.** We incorporate all significant changes to forms posted with this coversheet. However, unexpected issues occasionally arise, or legislation is passed—in this case, we will post a new draft of the form to alert users that changes were made to the previously posted draft. Thus, there are never any changes to the last posted draft of a form and the final revision of the form. Forms and instructions are subject to OMB approval before they can be officially released, so we post drafts of them until they are approved. Drafts of instructions and pubs usually have some additional changes before their final release. Early release drafts are at [IRS.gov/DraftForms](https://www.irs.gov/DraftForms) and remain there after the final release is posted at [IRS.gov/LatestForms](https://www.irs.gov/LatestForms). Also see [IRS.gov/Forms](https://www.irs.gov/Forms).

Most forms and publications have a page on IRS.gov: [IRS.gov/Form1040](https://www.irs.gov/Form1040) for Form 1040; [IRS.gov/Pub501](https://www.irs.gov/Pub501) for Pub. 501; [IRS.gov/W4](https://www.irs.gov/W4) for Form W-4; and [IRS.gov/ScheduleA](https://www.irs.gov/ScheduleA) for Schedule A (Form 1040), for example, and similarly for other forms, pubs, and schedules for Form 1040. When typing in a link, type it into the address bar of your browser, not a Search box on IRS.gov.

If you wish, you can submit comments to the IRS about draft or final forms, instructions, or pubs at [IRS.gov/FormsComments](https://www.irs.gov/FormsComments). Include “NTF” followed by the form or pub number (for example, “NTF1040”, “NTFW4”, “NTF501”, etc.) in the body of the message to route your message properly. We cannot respond to all comments due to the high volume we receive and may not be able to consider many suggestions until the subsequent revision of the product, but we will review each “NTF” message. If you have comments on reducing paperwork and respondent (filer) burden, with respect to draft or final forms, please respond to the relevant information collection through the Federal Register process; for more info, click [here](#).

Form **5472**

(Rev. December 2026)

**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)**

OMB No. 1545-0123

Go to [www.irs.gov/Form5472](http://www.irs.gov/Form5472) for instructions and the latest information.

Department of the Treasury  
Internal Revenue Service

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.

<b>1a</b> Name of reporting corporation				<b>1b</b> Employer identification number	
Number and street (if a P.O. box, see instructions)			Room or suite number		<b>1c</b> Total assets \$
City or town		State or province	Country	ZIP or foreign postal code	
<b>1d</b> Principal business activity				<b>1e</b> Principal business activity code	
<b>1f</b> Total value of gross payments made or received reported on <b>this</b> Form 5472. See instructions. \$		<b>1g</b> Total number of Forms 5472 filed for the tax year		<b>1h</b> Total value of gross payments made or received reported on <b>all</b> Forms 5472. See instructions. \$	
<b>1i</b> Check here if this is a consolidated filing of Form 5472 <input type="checkbox"/>	<b>1j</b> Check here if this is the initial year for which the U.S. reporting corporation is filing a Form 5472 <input type="checkbox"/>		<b>1k</b> Total number of Parts VIII attached to Form 5472		<b>1l</b> Country of incorporation
<b>1m</b> Date of incorporation	<b>1n</b> Country(ies) under whose laws the reporting corporation files an income tax return as a resident			<b>1o</b> Principal country(ies) where business is conducted	
<b>2</b> Check here if, at any time during the tax year, any foreign person owned, directly or indirectly, at least 50% of <b>(a)</b> the total voting power of all classes of the stock of the reporting corporation entitled to vote, or <b>(b)</b> the total value of all classes of stock of the reporting corporation <input type="checkbox"/>					
<b>3</b> 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).

<b>4a</b> Name and address of direct 25% foreign shareholder					
<b>4b(1)</b> U.S. identifying number, if any		<b>4b(2)</b> Reference ID number (see instructions)		<b>4b(3)</b> Foreign taxpayer identification number (FTIN), if any (see instructions)	
<b>4c</b> Principal country(ies) where business is conducted		<b>4d</b> Country of citizenship, organization, or incorporation		<b>4e</b> Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident	
<b>5a</b> Name and address of direct 25% foreign shareholder					
<b>5b(1)</b> U.S. identifying number, if any		<b>5b(2)</b> Reference ID number (see instructions)		<b>5b(3)</b> FTIN, if any (see instructions)	
<b>5c</b> Principal country(ies) where business is conducted		<b>5d</b> Country of citizenship, organization, or incorporation		<b>5e</b> Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident	
<b>6a</b> Name and address of ultimate indirect 25% foreign shareholder					
<b>6b(1)</b> U.S. identifying number, if any		<b>6b(2)</b> Reference ID number (see instructions)		<b>6b(3)</b> FTIN, if any (see instructions)	
<b>6c</b> Principal country(ies) where business is conducted		<b>6d</b> Country of citizenship, organization, or incorporation		<b>6e</b> Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident	
<b>7a</b> Name and address of ultimate indirect 25% foreign shareholder					
<b>7b(1)</b> U.S. identifying number, if any		<b>7b(2)</b> Reference ID number (see instructions)		<b>7b(3)</b> FTIN, if any (see instructions)	
<b>7c</b> Principal country(ies) where business is conducted		<b>7d</b> Country of citizenship, organization, or incorporation		<b>7e</b> Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident	

DRAFT — DO NOT FILE

DRAFT — DO NOT FILE

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

8b(1) U.S. identifying number, if any | 8b(2) Reference ID number (see instructions) | 8b(3) FTIN, if any (see instructions)

8c Principal business activity | 8d Principal business activity code

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 | 8g Country(ies) under whose laws the related party files an income tax return as a resident

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. [ ]

Table with 36 rows for monetary transactions. Rows 9-22 cover sales and receipts; rows 23-36 cover purchases and payments. Includes sub-rows for beginning/ending balances and monthly averages.

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. [ ]

DRAFT — DO NOT FILE

DRAFT — DO NOT FILE

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

- 37 Does the reporting corporation import goods from a foreign related party?
38a If the answer to question 37 is "Yes," is the reporting corporation's basis or inventory cost in any such goods greater than the customs value of such imported goods?
38b If the answer to question 37 is "Yes," is the amount of any costs taken into account by the reporting corporation in computing basis or inventory cost of any such goods greater than the amount of such costs as they are taken into account in computing the customs value of the imported goods?
38c If the answer to either question 38a or 38b is "Yes," were the documents used to support such treatment of the imported goods in existence and available in the United States at the time of filing Form 5472?
39 During the tax year, was the foreign parent corporation a participant in any cost sharing arrangement (CSA)?
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?
40b If "Yes," enter the total amount of the disallowed deductions
41a Is the reporting corporation claiming a foreign-derived deduction eligible income (FDDEI) deduction (under section 250) with respect to any transactions with the foreign related party?
41b 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 FDDEI.
41c 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.
41d 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.
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)?
42b 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)?
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?
43b If the answer to question 43a is "Yes," provide the following.
(1) The amount of such transaction(s), distribution(s), and acquisition(s)
(2) The amount of such related party indebtedness

DRAFT - DO NOT FILE

DRAFT - DO NOT FILE

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.
45 During the course of the tax year, did the reporting corporation become a participant in the CSA?
46 Was the CSA in effect before January 5, 2009?
47 What was the reporting corporation's share of reasonably anticipated benefits for the CSA?
48a Enter the total amount of stock-based compensation deductions claimed by the reporting corporation
48b 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
48c 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?
49a Enter the total amount of intangible development costs for the CSA
49b Enter the amount of intangible development costs allocable to the reporting corporation based on the reporting corporation's reasonably anticipated benefits share

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)
51 Amount of base erosion tax benefits under section 59A(c)(2)
52 Amount of total qualified derivative payments as described in section 59A(h) made by the reporting corporation
53 Reserved for future use