

## Transactions of Foreign-Owned Corporations Line Item Estimates

2021



www.irs.gov/statistics

Form **5472** 

(Rev. December 2021)

Department of the Treasury

## 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)

No to ware impared Form E470 for instructions and the letter information

► Go to www.irs.gov/Form5472 for instructions and the latest information.

For tax year of the reporting corporation beginning , , and ending \_\_\_\_\_\_, , and ending \_\_\_\_\_\_, note: Enter all information in English and money items in U.S. dollars.

OMB No. 1545-0123

Internal Revenue Service Reporting Corporation (see instructions). All reporting corporations must complete Part I. 1a Name of reporting corporation 1b Employer identification number NUMBER OF REPORTING CORPORATIONS 3,179 Number, street, and room or suite no. (If a P.O. box, see instructions.) 1c Total assets All figures are estimates based on a sample City or town, state, and ZIP code (If a foreign address, see instructions.) \$ 1d Principal business activity ▶ 3,179 1e Principal business activity code ▶ 3,179 1g Total number of Forms 5472 1f Total value of gross payments made or received 1h Total value of gross payments made or received reported on this Form 5472. See instructions. filed for the tax year reported on all Forms 5472. See instructions. 31,666 41,363 Check here if this is a 1j Check here if this is the initial year for 1k Total number of Parts VIII 11 Country of incorporation attached to Form 5472 consolidated filing of which the U.S. reporting corporation Form 5472 is filing a Form 5472 3,179 1m Date of incorporation 1n Country(ies) under whose laws the reporting 10 Principal country(ies) where business is conducted corporation files an income tax return as a resident 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 2.722 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 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 25% Foreign Shareholder (see instructions) Part II 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 4b(1) U.S. identifying number, if any 4b(2) Reference ID number (see instructions) 4b(3) Foreign taxpayer identification number (FTIN), if any (see instructions) 1,793 124 4c Principal country(ies) where 4d Country of citizenship, 4e Country(ies) under whose laws the direct 25% foreign business is conducted organization, or incorporation shareholder files an income tax return as a resident 3,099 3,115 3,144 5a Name and address of direct 25% foreign shareholder 5b(1) U.S. identifying number, if any 5b(2) Reference ID number (see instructions) 5b(3) FTIN, if any (see instructions) 10 5c Principal country(ies) where 5d Country of citizenship, 5e Country(ies) under whose laws the direct 25% foreign business is conducted organization, or incorporation shareholder files an income tax return as a resident 84 82 83 6a Name and address of ultimate indirect 25% foreign shareholder 6b(1) U.S. identifying number, if any 6b(2) Reference ID number (see instructions) 6b(3) FTIN, if any (see instructions) 102 6e Country(ies) under whose laws the ultimate indirect 25% foreign 6c Principal country(ies) where 6d Country of citizenship, business is conducted organization, or incorporation shareholder files an income tax return as a resident 1,622 1.632 1,614 7a Name and address of ultimate indirect 25% foreign shareholder 7b(1) U.S. identifying number, if any 7b(2) Reference ID number (see instructions) 7b(3) FTIN, if any (see instructions) 7d Country of citizenship, 7e Country(ies) under whose laws the ultimate indirect 25% foreign 7c Principal country(ies) where business is conducted organization, or incorporation shareholder files an income tax return as a resident 181 172 172

		on or U.S. person? 4,110	lated party	Name and address of related party	3a N
		.,	. ,	39,876	
		Bb(3) FTIN, if any (see instructions)	er, if any 8b(2) Reference ID num	U.S. identifying number, if any	b(1)
1,244		,	9,842	9,842	
39,820	/ code	5 8d Principal business activity	ty ► 39,876 22,177	Principal business activity ► 39,8	8c P
gn shareholder	25% t	ted to 25% foreign shareholder	xes that apply:  Related to repo		
return as a	incom	hose laws the related party files an	ere business is conducted	Principal country(ies) where busine	3f P
39,872			39,872		
structions)	ty (se	s and Foreign Related Par	Transactions Between Rep	t IV Monetary Transac	Part
art III.	ng fo	box is checked in the head	art IV <b>must</b> be completed if		
2,574			s are used, check here. ► 🗆	If estimates are use	
10,352	9		e (inventory)	Sales of stock in trade (inventory	9
578	10		perty other than stock in trade	Sales of tangible property other	0
6	11		transaction payments received .	Platform contribution transaction	11
190	12		ion payments received	Cost sharing transaction payme	2
144	13a		her than intangible property rights)	Rents received (for other than in	3а
672	13b		r other than intangible property righ	•	b
790	14		s, etc., of intangible property rights		4
8,348	15	ific, or like services	ed for technical, managerial, engine		5
852	16				6
3,738	17b		instructions) a Beginning balance_		7
1,460	18				8
300	19		r insurance or reinsurance		9
17 6,227	20		received	· ·	20
23,497	21		ed (see instructions)	`	21
	22		unts on lines 9 through 21		22
8,273	23		trade (inventory)	,	23
860	24		property other than stock in trade		24
39 198	25 26		transaction payments paid		25
121	27a		ion payments paid ........ than intangible property rights)..		26
631	27b		nan mangible property rights) ner than intangible property rights) .		27a b
488	28		enses, etc., of intangible property r	• • •	28
8,475	29		r technical, managerial, engineering		29
893	30				30
3,832	31b		nstructions) <b>a</b> Beginning balance	•	31
1,726	32				32
361	33		surance or reinsurance		3
127	34			•	4
7,077	35		see instructions)	=	5
22,600	36		ints on lines 23 through 35		6
instructions)		nt Is a Foreign-Owned U.S.	e Transactions of a Report	rt V Reportable Transa	ar
,	,	•	n an attached separate shee	•	
			nounts paid or received in co		
ď			y, including contributions to		

Form 5472 (Rev. 12-2021) Page 3 Additional Information. All reporting corporations must complete Part VII. Part VII 37 No 19,049 If "Yes," is the basis or inventory cost of the goods valued at greater than the customs value of the imported goods? 565  $\square$  Yes ☐ No **22,036** 38a If "Yes," attach a statement explaining the reason or reasons for such difference. If the answers to questions 37 and 38a are "Yes," were the documents used to support this treatment of the imported ☐ No **883** 39 During the tax year, was the foreign parent corporation a participant in any cost sharing arrangement (CSA)? . . . 1,771 Yes ☐ No **35.322** During the tax year, did the reporting corporation pay or accrue any interest or royalty for which the deduction is not ■ No 34,919 b If "Yes," enter the total amount of the disallowed deductions . . . . . . . . . 118 Does the reporting corporation claim a foreign-derived intangible income (FDII) deduction (under section 250) with respect □ No 29,707 If "Yes," enter the amount of gross income derived from sales, leases, exchanges, or other dispositions (but not licenses) of property to the foreign related party that the reporting corporation included in its computation of foreign-derived 3,789 If "Yes," enter the amount of gross income derived from a license of property to the foreign related party that the reporting 653 If "Yes," enter the amount of gross income derived from services provided to the foreign related party that the reporting 2,084 Did the reporting corporation have any loan to or from the related party, to which the safe-haven rate rules of Regulations 42 section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safehaven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the relevant term)? . . . . . . 526 Yes No 31,016 Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) 133 31 265 during the tax year or, during the period beginning 36 months before the date of the respective acquisition or distribution and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party? ☐ Yes ☐ No If the answer to guestion 43a is "Yes," provide the following. 130 69 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.) Provide a brief description of the CSA with respect to which this Part VIII is being completed. 45 ☐ No ☐ No 46 47 % Enter the total amount of stock-based compensation deductions claimed by the reporting corporation . . . . . . \$ 48a Enter the total amount of deductions for the tax year for stock-based compensation that was granted during the term of the CSA and, at date of grant, is directly identified with, or reasonably allocable to, the intangible development activity under the CSA \$ Was there any stock-based compensation granted during the term of the CSA to individuals who performed functions in

	allocable to, the intangible development activity?	Yes	☐ No
49a	Enter the total amount of intangible development costs for the CSA		
b	Enter the amount of intangible development costs allocable to the reporting corporation based on the reporting corporation's reasonably anticipated benefits share		
Par	Base Erosion Payments and Base Erosion Tax Benefits Under Section 59A (see instruct	ions)	
50	Amounts defined as base erosion payments under section 59A(d)		11,439
51	Amount of base erosion tax benefits under section 59A(c)(2)		10,80
52	Amount of total qualified derivative payments as described in section 59A(h) made by the reporting corporation \$		27
53	Reserved for future use		
	For	m <b>5472</b> (Re	ev. 12-2021

(Rev. December 2021)

## 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.

Department of the Treasury

For tax year of the reporting corporation beginning \_\_\_\_\_\_, and ending \_\_\_\_\_, \_\_\_\_, Note: Enter all information in English and money items in U.S. dollars.

OMB No. 1545-0123

interi	nai Revenue Service	Note: Enter all i	nformation in English	and money	items in	U.S. dollars.		
P	art Reporting Corpora	ation (see ins	tructions). All repo	orting cor	poratic	ns must co	mplete Part I.	
1a	Name of reporting corporation						1b Employer identification nu	mbei
Moı	ney amounts are in thousands of dol	lars						
	Number, street, and room or suite	no. (If a P.O. box	k, see instructions.)				1c Total assets	
All	figures are estimates based on a sa						]	
	City or town, state, and ZIP code (	lf a foreign addre	ess, see instructions.)					
							\$	
	Principal business activity ►					•	siness activity code	
1f	Total value of gross payments mad reported on <b>this</b> Form 5472. See in		<b>1g</b> Total number of I filed for the tax y		1h		of gross payments made or receive all Forms 5472. See instructions.	ed
•			liled for the tax y	Cai		reported on	an i offis 5472, See instructions.	
\$		2,599,046	the initial year for	4k Total r	\$	of Parts VIII	41 Country of incorporation	
"	consolidated filing of wh	ich the U.S. repo	orting corporation		ed to Fo	11 Country of incorporation		
1m	•	• • •	whose laws the report income tax return as	•	10	Principal coun	try(ies) where business is conduct	ed:
2	Check here if, at any time during the classes of the stock of the reporting							
3	Check here if the reporting corpora purposes of section 6038A. See in	•		•	• .	•	DE) treated as a corporation for ▶	
Р	art II 25% Foreign Shar	<b>eholder</b> (see	instructions)					
	Check here if any d			foreign s	hareho	lder listed i	n Part II is a surrogate forei	gn
4a	Name and address of direct 25% f	oreign sharehold	ler					
41-	(A) II C intentif in a country if any	4h(0) Deferen	a ID was been force in a		4h (0) - F	:	widentification assets of (ETIN) if a	
4D)	(1) U.S. identifying number, if any	4b(2) Reference	ce <b>I</b> D number (see inst	ructions)		ee instructions	er identification number (FTIN), if a s)	ny
4c	Principal country(ies) where business is conducted	4d Country of organizatio	citizenship, n, or incorporation				aws the direct 25% foreign e tax return as a resident	
5a	Name and address of direct 25% f	l oreign sharehold	ler					
		_						
5b	(1) U.S. identifying number, if any	5b(2) Reference	e ID number (see instr	uctions)	5b(3) F	IN, if any (see	e instructions)	
5c	Principal country(ies) where business is conducted	5d Country of organizatio	citizenship, n, or incorporation		, ,		aws the direct 25% foreign e tax return as a resident	
6a	Name and address of ultimate indi	rect 25% foreigr	shareholder	!				
6b	(1) U.S. identifying number, if any	6b(2) Reference	e ID number (see instr	uctions)	6b(3) F	IN, if any (see	instructions)	
6c	Principal country(ies) where business is conducted	6d Country of organizatio	citizenship, n, or incorporation				aws the ultimate indirect 25% fore e tax return as a resident	eign
7a	Name and address of ultimate indi	rect 25% foreigr	shareholder					
7b(	(1) U.S. identifying number, if any	<b>7b(2)</b> Reference	e ID number (see instr	uctions)	7b(3) F	IN, if any (see	instructions)	
7c	Principal country(ies) where business is conducted	7d Country of organizatio	citizenship, n, or incorporation				aws the ultimate indirect 25% fore e tax return as a resident	eign
							-	

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, ▶ □    Sales of stock in trade (inventory)   9 953,416,409     Sales of stock in trade (inventory)   12 2,021,862     Cost sharing transaction payments paid   9 957,300,889     Sales of stock in trade (inventory)   14 2,025,331     Purchases of tangble property differ than stock in trade (inventory)   23 1,452,205,410     Purchases of tangble property other than stock in trade (inventory)   23 1,452,205,410     Purchases of tangble property other than stock in trade (inventory)   25 1,439,433     Purchases of tangble property other than stock in trade (inventory)   26 0,436,436     Purchases of tangble property other than stock in trade (inventory)   27 1,439,436     Purchases of tangble property other than stock in trade (inventory)   28 1,447,33     Conmissions paid (for other than intangible property rights)   27 1,439,436     Part V   Purchases of tangble property other than stock	Form 54	472 (Rev. 12-2021)		Page 2
8a Name and address of related parry  8b(1) U.S. identifying number, if any   8b(2) Reference ID number (see instructions)   8c Principal business activity   8c Patationship.—Check bowse that apply:     Related to reporting corporation    Related to 25% foreign shareholder     Principal country(ise) where business is conducted     Report	Par	Related Party (see instructions). All reporting corporations must complete this question	and the	e rest of Part III.
Bet(i) U.S. identifying number, if any    Bet(ii) U.S. identifying number, if any   Bet(iii) Reference ID number (see instructions)		Check applicable box: Is the related party a ☐ foreign person or ☐ U.S. person?		
8e Principal business activity ▶ 8d Principal business activity code ▶ 8e Relationship—Check boxes that apply:	8a N	lame and address of related party		
8e Principal business activity ▶ 8d Principal business activity code ▶ 8e Relationship—Check boxes that apply:				
Related to 25% foreign shareholder	8b(1)	U.S. identifying number, if any 8b(2) Reference ID number (see instructions) 8b(3) FTIN, if any (see instructions	s)	
Related to 25% foreign shareholder				
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, ▶ □    Sales of stock in trade (inventory)   9 953,416,409   9 95				
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.    Festimates are used, check here. ▶ □				
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	8T F		ı ıncome	tax return as a
Sales of stock in trade (inventory)  10 Sales of stock in trade (inventory)  11 Platform contribution transaction payments received  12 Cost sharing transaction payments received  12 (2013,862  13a Rents received (for other than intangible property rights)  13b 7,200,889  14 Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)  15 Consideration received for technical, managerial, engineering, construction, scientific, or like services  16 (50,7797,545  17 Announts borrowed (see instructions) a Beginning balance  17 Sales, leases engineering encounts received (see instructions)  18 Interest received (see instructions) a Beginning balance  19 Sales, leases of stock in trade (inventory)  19 Premiums received for insurance or reinsurance  19 4,224,633  20 Loan guarantee fees received  20 104,850  21 Other amounts received (see instructions)  21 140,456,50  22 170tal. Combine amounts on lines 9 through 21  23 Purchases of stock in trade (inventory)  24 15,434,633  25 Platform contribution transaction payments paid  26 Cost sharing transaction payments paid  27 Rents paid (for other than intangible property rights)  28 Purchases of stock in trade (inventory)  29 Consideration payments paid  20 Cost sharing transaction payments paid  21 Announts received (see instructions)  22 1,339,893  23 Purchases of stock in trade (inventory)  24 15,434,633  25 Platform contribution transaction payments paid  26 Cost sharing transaction payments paid  27 Total. Combine amounts on lines 9 through 50 total trade (inventory)  28 1,445,206,741  29 Cost sharing transaction payments paid  20 Cost sharing transaction payments paid  21 140,456,801  22 1,339,893  23 1,452,206,741  24 15,434,633  25 Platform contribution transaction payments paid  26 2,133,983  27 1,814,810,999  28 1,444,737  30 Commissions paid  29 Consideration paid for technical, managerial, engineerin		Todachi.		
Sales of stock in trade (inventory)  10 Sales of stock in trade (inventory)  11 Platform contribution transaction payments received  12 Cost sharing transaction payments received  12 (2013,862  13a Rents received (for other than intangible property rights)  13b 7,200,889  14 Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)  15 Consideration received for technical, managerial, engineering, construction, scientific, or like services  16 (50,7797,545  17 Announts borrowed (see instructions) a Beginning balance  17 Sales, leases engineering encounts received (see instructions)  18 Interest received (see instructions) a Beginning balance  19 Sales, leases of stock in trade (inventory)  19 Premiums received for insurance or reinsurance  19 4,224,633  20 Loan guarantee fees received  20 104,850  21 Other amounts received (see instructions)  21 140,456,50  22 170tal. Combine amounts on lines 9 through 21  23 Purchases of stock in trade (inventory)  24 15,434,633  25 Platform contribution transaction payments paid  26 Cost sharing transaction payments paid  27 Rents paid (for other than intangible property rights)  28 Purchases of stock in trade (inventory)  29 Consideration payments paid  20 Cost sharing transaction payments paid  21 Announts received (see instructions)  22 1,339,893  23 Purchases of stock in trade (inventory)  24 15,434,633  25 Platform contribution transaction payments paid  26 Cost sharing transaction payments paid  27 Total. Combine amounts on lines 9 through 50 total trade (inventory)  28 1,445,206,741  29 Cost sharing transaction payments paid  20 Cost sharing transaction payments paid  21 140,456,801  22 1,339,893  23 1,452,206,741  24 15,434,633  25 Platform contribution transaction payments paid  26 2,133,983  27 1,814,810,999  28 1,444,737  30 Commissions paid  29 Consideration paid for technical, managerial, engineerin	Pari	W Monetary Transactions Retween Reporting Cornorations and Foreign Related Par	rty (sp	instructions)
Sales of stock in trade (inventory)   9   953,416,409   10   Sales of stock in trade (inventory)   10   6,182,975   11   Platform contribution transaction payments received   11   6,90,309   12   Cost sharing transaction payments received   11   6,90,309   13   Rents received (for other than intangible property rights)   13a   489,073   15   Royalties received (for other than intangible property rights)   13b   7,200,889   15   Royalties received (for other than intangible property rights)   13b   7,200,889   16   Royalties received (for other than intangible property rights)   15   7,200,889   17   Commissions received (for other than intangible property rights)   14   26,806,873   15   Consideration received for technical, managerial, engineering, construction, scientific, or like services   15   87,797,545   16   Commissions received   16   4,553,312   17   Amounts borrowed (see instructions)   8 Beginning balance   957,300,089   b Ending balance or monthly average   16   4,553,312   18   Interest received   16   10,383,217   19   Premiums received for insurance or reinsurance   957,300,089   b Ending balance or monthly average   17   1,047,010,286   18   Interest received   20   104,855   19   Other amounts received (see instructions)   21   140,456,615   21   Total. Combine amounts on lines 9 through 21   22   2,291,338,85   22   Purchases of stock in trade (inventory)   23   1,452,266,741   23   Purchases of stock in trade (inventory)   23   1,452,266,741   24   Purchases of tangible property other than stock in trade   26   2,133,983   25   Platform contribution transaction payments paid   26   2,133,983   26   Royalties paid (for other than intangible property rights)   27a   700,840   27a   Royalties paid (for other than intangible property rights)   27a   700,840   27b   18,488,094   27b   18,488,094   27c   18,488,094   27c   18,488,094   27d   Royalties paid (for other than intangible property rights)   27a   18,488,094   27b   18,480,094   27b   18,488,094   27c   18,480,094   27b   18,480,094	ı aı			•
9 Sales of stock in trade (inventory) 10 Sales of tangible property other than stock in trade 11 6,182,975 11 Pilatrom contribution transaction payments received 11 6,993,99 12 Cost sharing transaction payments received 11 6,993,99 12 Cost sharing transaction payments received 12 2,021,862 13a Rents received (for other than intangible property rights) 13b 7,200,889 14 Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas) 15 Consideration received for technical, managerial, engineering, construction, scientific, or like services 16 4,553,311 17 Amounts bornowed (see instructions) a Beginning balance 18 Interest received 19 4,224,633 20 Loan guarantee fees received 20 104,850 21 Other amounts received (see instructions) 21 Total Combine amounts on lines 9 through 21 2 2,291,338,85 23 Purchases of tangible property other than stock in trade 24 15,493,393 25 Pilatrom contribution transaction payments paid 26 Cost sharing transaction payments paid 27 Rents paid (for other than intangible property rights) 28 Purchases, leases, licenses, etc., of intangible property rights) 29 Consideration payments paid 30 Rents paid (for other than intangible property rights) 31 Amounts bornowed (see instructions) 32 Purchases of tangible property rights) 33 Patents paid (for other than intangible property rights) 34 Rents paid (for other than intangible property rights) 35 Consideration paid for technical, managerial, engineering, construction, scientific, or like services 36 2,199,139 37 Amounts loaned (see instructions) 38 15,409,999 39 Consideration paid for technical, managerial, engineering, construction, scientific, or like services 30 2,109,139 31 Amounts loaned (see instructions) 31 Amounts loaned (see instructions) 32 153,247,372 33 14 Loan guarantee fees paid 35 Other amounts paid see instructions) 36 2,190,231,400 37 Reportable Transactions of a Reporting Corporation That Is a Foreign-Owned U.S. DE (see instructions) 36 153,247,372 37 Total. Combine amounts on l			iiig ioi	i dit iii.
10   Sales of tangible property other than stock in trade   10   6,182,975     11   Platform contribution transaction payments received   11   690,309     12   Cost sharing transaction payments received   12   2,021,862     13a   Rents received (for other than intangible property rights)   13b   7,200,889     15a   Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)   14   26,800,873     15c   Consideration received for technical, managerial, engineering, construction, scientific, or like services   15   87,797,184     16c   Commissions received   15   87,797,184     16c   Commissions received   16   4,553,312     16c   Commissions received   18c   10,383,217     17d   Amounts borrowed (see instructions) a Beginning balance   957,300,089     18c   Interest received   18c   10,383,217     19c   Premiums received for insurance or reinsurance   957,300,089     19c   Premiums received for insurance or reinsurance   19   4,224,633     19c   Premiums received (see instructions)   20   104,850     19c   Total. Combine amounts on lines 9 through 21   22   2,291,338,85     27d   Purchases of fangible property other than stock in trade (inventory)   23   1,452,206,741     28d   Purchases of fangible property other than stock in trade (inventory)   25   488,716     28d   Purchases paid (for other than intangible property rights)   27a   700,840     28d   Purchases, pleases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)   28   15,409,992     29d   Consideration paid for technical, managerial, engineering, construction, scientific, or like services   29   54,414,737     31d   Amounts loaned (see instructions)   3   6,119,231,431     32d   Interest paid (see instructions)   3   6,119,231,431     32d   Total. Combine amounts on lines 23 through 35   75,000,800     32d   75,000,800   75,000,800   75,000,800   75,000,800   75,000,800   75,000,800   75,000,800   75,000,800   75,000,800   75,000,800   75,000,800   7	9	Sales of stock in trade (inventory)	9	953,416,409
Platform contribution transaction payments received   12   2,021,862			10	
12   2,021,862   13a   Rents received (for other than intangible property rights)   13a   489,073   13b   7,200,1892   13b   7,200,1892   13b   7,200,1892   13b   7,200,1892   13b   7,200,1892   14c   26,806,873   15c   20,806,873   20,	11		11	690.309
13a   A99,073     b   Royalties received (for other than intangible property rights)   13b   7,200,899     Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)   14   26,806,873     15   Consideration received for technical, managerial, engineering, construction, scientific, or like services   15   87,797,545     16   Commissions received (see instructions) a Beginning balance   957,300,089   b Ending balance or monthly average   17b   10,479,101,286     18   Interest received (see instructions) a Beginning balance   957,300,089   b Ending balance or monthly average   17b   10,479,101,286     18   10,383,217     19   Premiums received for insurance or reinsurance   19   4,224,633     10   Cher amounts received (see instructions)   21   140,456,615     10   Cher amounts received (see instructions)   21   140,456,615     11   21   22   22,291,338,851     22   Total. Combine amounts on lines 9 through 21   23   1,452,206,741     23   1,452,206,741     24   15,843,633     25   Platform contribution transaction payments paid   25   488,716     26   Cost sharing transaction payments paid   25   488,716     27   Rents paid (for other than intangible property rights)   27e   27e   27e   27e   27e     27   Rents paid (for other than intangible property rights)   27e   27e   27e   27e   27e   27e     28   15,409,992     29   Consideration paid for technical, managerial, engineering, construction, scientific, or like services   29   54,414,737     29   Consideration paid for technical, managerial, engineering, construction, scientific, or like services   29   54,414,737     29   Consideration paid for technical, managerial, engineering, construction, scientific, or like services   29   54,414,737     20   Commissions paid   31   49,0387,817     21   Interest paid   32   49,0387,817     22   14,038,044   32   33   38,379,321     23   14,039   34   34   34,0387,817     24   14,039   34   34   34,0387,817     25   14,039   35   35,247,3506     36   2,190,231,407	12	·	12	
Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)  14 26,806,873 15 Consideration received for technical, managerial, engineering, construction, scientific, or like services  15 87,797,545 16 Commissions received  16 4,553,312 17 Amounts borrowed (see instructions) a Beginning balance  957,300,089 b Ending balance or monthly average   17b 10,477,010,286 18 Interest received  19 4,224,633 10 Loan guarantee fees received  19 4,224,633 10 Loan guarantee fees received  20 104,850 11 H40,456,615 12 Total. Combine amounts on lines 9 through 21 12 Total. Combine amounts on lines 9 through 21 13 H40,456,615 14 Purchases of stock in trade (inventory) 15 Platform contribution transaction payments paid 16 Cost sharing transaction payments paid 17 Purchases of tangible property other than stock in trade 18 10,383,217 19 Purchases of tangible property prights) 19 4,224,633 10 Platform contribution transaction payments paid 20 1,483,633 21 Platform contribution transaction payments paid 21 1,452,206,741 22 2,291,338,851 23 Platform contribution transaction payments paid 24 15,843,633 25 Platform contribution transaction payments paid 26 27 27 700,840 27 Rents paid (for other than intangible property rights) 27 Rents paid (for other than intangible property rights) 28 15,409,992 29 Consideration paid for technical, managerial, engineering, construction, scientific, or like services 29 54,414,737 30 Commissions paid 30 2,109,133 31 Amounts loaned (see instructions) 31 Amounts loaned (see instructions) 32 35,278,508 33 Premiums paid for insurance or reinsurance 34 1,1142,514 35 Other amounts paid (see instructions) 36 153,247,372 37 Total. Combine amounts on lines 23 through 35 37 Total. Combine amounts on lines 23 through 35 38 153,247,372 39 Commissions paid 39 Permiums paid for insurance or reinsurance 413,763,166 b Ending balance or monthly average  30 3,379,321 31 Total. Combine amounts on lines 23 through 35 31 Total. Combine amounts on lines 23 through 35 31	13a		13a	489,073
To Consideration received for technical, managerial, engineering, construction, scientific, or like services  15 87,797,545 Commissions received  Amounts borrowed (see instructions) a Beginning balance  957,300,089 b Ending balance or monthly average  18 Interest received  18 10,383,217 Premiums received for insurance or reinsurance  19 4,224,633 20 Loan guarantee fees received  20 104,850 20 10 Other amounts received (see instructions)  21 140,456,6119 22 Total. Combine amounts on lines 9 through 21  22 1,291,338,857 23 Purchases of stock in trade (inventory)  23 1,452,206,741  24 Purchases of tangible property other than stock in trade  25 488,716 26 Cost sharing transaction payments paid  26 2,133,983 27a Rents paid (for other than intangible property rights)  27b 184,888,094 28 Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)  28 15,409,992 29 Consideration paid for technical, managerial, engineering, construction, scientific, or like services  29 54,414,737 30 Commissions paid  Amounts loaned (see instructions)  30 2,109,139 31 Amounts loaned (see instructions)  31 Amounts loaned (see instructions)  32 3 3,52,78,508 33 Premiums paid for insurance or reinsurance  413,763,166 b Ending balance or monthly average  31b 430,387,817 32 Interest paid  33 8,379,321 34 Commissions paid  413,763,166 b Ending balance or monthly average  Amounts loaned (see instructions)  35 153,247,372 36 Total. Combine amounts on lines 23 through 35  Total. C	b	Royalties received (for other than intangible property rights)	13b	7,200,889
16 Commissions received  Amounts borrowed (see instructions) a Beginning balance  17 Amounts borrowed (see instructions) a Beginning balance  18 Interest received  18 Interest received for insurance or reinsurance  19 4,224,633  20 Loan guarantee fees received  20 104,850  21 Other amounts received (see instructions)  22 Total. Combine amounts on lines 9 through 21  23 1,452,206,741  24 Purchases of stock in trade (inventory)  25 Purchases of tangible property other than stock in trade  26 Purchases of tangible property other than stock in trade  27 Purchases of tangible property other than stock in trade  28 Platform contribution transaction payments paid  29 Purchases of tangible property rights)  20 Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)  28 Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)  29 Consideration paid for technical, managerial, engineering, construction, scientific, or like services  29 54,414,737  30 Commissions paid  30 2,109,133  31 Amounts loaned (see instructions) a Beginning balance  413,763,166 b Ending balance or monthly average   31 1,42,514  32 Interest paid  33 3,379,321  34 Loan guarantee fees paid  413,763,166 b Ending balance or monthly average   31 3,5278,508  32 153,247,372  35 Other amounts paid (see instructions)  36 2,190,231,407  37 Total. Combine amounts on lines 23 through 35  38 Permiums paid for insurance or reinsurance  39 Capportable Transactions of a Reporting Corporation That Is a Foreign-Owned U.S. DE (see instructions)  30 Describe on an attached separate sheet any other transaction as defined by Regulations section 1.482-1(l)(7), such as amounts paid contributions to and distributions from the entity, and check here.   30 Comparison paid the Foreign Related Party (see instructions)	14		14	26,806,873
176   1,047,010,286   186   Interest received   176   1,047,010,286   186   Interest received   186   10,383,217   197   199   199   1,224,633   199   199   1,224,633   190   190   1,224,633   190   190   1,224,633   190   190   1,224,633   190   10,485,615   190   1,224,633   190   10,485,615   190   10,485,615   190   10,485,615   190   10,485,615   190   10,485,615   190   10,485,615   190   10,485,615   190   10,485,615   190   10,485,615   190   10,485,615   190   10,485,615   190   10,485,615   190   10,485,615   190   10,485,615   190	15	Consideration received for technical, managerial, engineering, construction, scientific, or like services	15	87,797,545
Interest received   18   10,383,217   19   Premiums received for insurance or reinsurance   19   4,224,633   20   Loan guarantee fees received   20   104,850   21   104,850   21   104,850   22   2,291,338,85   23   Purchases of stock in trade (inventory)   23   1,452,206,741   24   Purchases of tangible property other than stock in trade   24   15,843,633   25   Platform contribution transaction payments paid   25   488,716   26   27   33,983   27a   Rents paid (for other than intangible property rights)   27a   700,840   28   Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)   28   15,409,992   29   Consideration paid for technical, managerial, engineering, construction, scientific, or like services   29   54,414,737   29   Consideration paid for technical, managerial, engineering, construction, scientific, or like services   29   54,414,737   30   Commissions paid   413,763,166   b Ending balance or monthly average   31   430,387,817   31   Amounts loaned (see instructions)   a Beginning balance   413,763,166   b Ending balance or monthly average   31   430,387,817   32   Interest paid   Contract or reinsurance or reinsurance   33   35,278,508   35,278,508   35   153,247,372   36   Total. Combine amounts on lines 23 through 35   Cother amounts paid (see instructions)   Beginning balance   413,763,166   b Ending balance or monthly average   36   2,190,231,407   37   37   38   27   38   38   39,393,217   39   39   39   39   39   39   39   3	16	Commissions received	16	4,553,312
19	17	Amounts borrowed (see instructions) <b>a</b> Beginning balance 957,300,089 <b>b</b> Ending balance or monthly average ▶	17b	1,047,010,286
20	18	Interest received	18	10,383,217
Total. Combine amounts on lines 9 through 21 140,456,619  Total. Combine amounts on lines 9 through 21 22 2,291,338,85  Purchases of stock in trade (inventory) 23 1,452,206,741  Purchases of tangible property other than stock in trade Purchases of tangible property other than stock in trade Cost sharing transaction payments paid 25 488,716  Cost sharing transaction payments paid 26 2,133,983  Rents paid (for other than intangible property rights) 27a 700,840  Broyalties paid (for other than intangible property rights) 27b 18,488,094  Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas) Consideration paid for technical, managerial, engineering, construction, scientific, or like services 29 54,414,737  Commissions paid 30 2,109,139  Amounts loaned (see instructions) a Beginning balance 413,763,166 b Ending balance or monthly average 2 31b 430,387,817  Interest paid 32 35,278,508  Premiums paid for insurance or reinsurance 33 3,8,379,321  Loan guarantee fees paid 34 1,142,514  Cother amounts paid (see instructions) 35 153,247,372  Total. Combine amounts on lines 23 through 35 36 2,190,231,407  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 cor received in connection with the formation, dissolution, acquisition, and disposition of the entity, including contributions to and distributions from the entity, and check here.  Nonmonetary and Less-Than-Full Consideration Transactions Between the Reporting Corporation and the Foreign Related Party (see instructions)	19	Premiums received for insurance or reinsurance	19	4,224,633
Total. Combine amounts on lines 9 through 21  22 2,291,338,85  23 Purchases of stock in trade (inventory)  24 15,843,633  25 Platform contribution transaction payments paid  26 Cost sharing transaction payments paid  27  Power than intangible property rights)  28  Power than intangible property rights)  29  Power than intangible property rights)  20  Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)  28  Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)  29  Consideration paid for technical, managerial, engineering, construction, scientific, or like services  29  54,414,737  30  Commissions paid  30  2,109,139  31  Amounts loaned (see instructions) a Beginning balance	20	Loan guarantee fees received	20	104,850
Purchases of stock in trade (inventory).  23  1,452,206,741 24  Purchases of tangible property other than stock in trade 24  15,843,633 25  Platform contribution transaction payments paid. 26  Cost sharing transaction payments paid 27a  Rents paid (for other than intangible property rights). 27b  Royalties paid (for other than intangible property rights). 27c  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 27d  Royalties paid (for other than intangible property rights). 28d  Royalties paid (for other than intangible property rights). 28d  Royalties paid (for other than intangible property rights). 28d  Royalties paid (for other than intangible property rights. 28d  Royalties paid (for other than intangible property rights.	21	Other amounts received (see instructions)	21	140,456,619
Purchases of tangible property other than stock in trade  24	22	Total. Combine amounts on lines 9 through 21	22	2,291,338,85
Platform contribution transaction payments paid	23	Purchases of stock in trade (inventory)	23	1,452,206,741
Cost sharing transaction payments paid 26 2,133,983 27a Rents paid (for other than intangible property rights) 27a 700,840 b Royalties paid (for other than intangible property rights) 27b 18,488,094 28 Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas) 29 Consideration paid for technical, managerial, engineering, construction, scientific, or like services 29 54,414,737 30 Commissions paid 30 2,109,139 31 Amounts loaned (see instructions) a Beginning balance 413,763,166 b Ending balance or monthly average ▶ 31b 430,387,817 32 Interest paid 32 35,278,508 33 Premiums paid for insurance or reinsurance 33 8,379,321 4 Loan guarantee fees paid 34 1,142,514 55 Other amounts paid (see instructions) 35 153,247,372 56 Total. Combine amounts on lines 23 through 35 36 2,190,231,407  Part V Reportable Transactions of a Reporting Corporation That Is a Foreign-Owned U.S. DE (see instructions) 3c 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)	24	Purchases of tangible property other than stock in trade	24	15,843,633
Rents paid (for other than intangible property rights). 27a 700,840 b Royalties paid (for other than intangible property rights). 27b 18,488,094 28 Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas) 29 Consideration paid for technical, managerial, engineering, construction, scientific, or like services 29 54,414,737 30 Commissions paid 30 2,109,139 31 Amounts loaned (see instructions) a Beginning balance 413,763,166 b Ending balance or monthly average ▶ 31b 430,387,817 32 Interest paid 32 35,278,508 33 Premiums paid for insurance or reinsurance 33 8,379,321 4 Loan guarantee fees paid 34 1,142,514 55 Other amounts paid (see instructions) 35 153,247,372 36 Total. Combine amounts on lines 23 through 35 36 2,190,231,407  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)	25	Platform contribution transaction payments paid	25	488,716
Box Royalties paid (for other than intangible property rights)  Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)  Consideration paid for technical, managerial, engineering, construction, scientific, or like services  Consideration paid for technical, managerial, engineering, construction, scientific, or like services  Commissions paid  Commissions paid  Amounts loaned (see instructions) a Beginning balance  413,763,166 b Ending balance or monthly average  Interest paid  Amounts paid for insurance or reinsurance  32 35,278,508  33 Premiums paid for insurance or reinsurance  34 1,142,514  35 Other amounts paid (see instructions)  Combine amounts on lines 23 through 35  Total. Combine amounts on lines 23 through 35  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)	26	Cost sharing transaction payments paid	26	2,133,983
Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)  Consideration paid for technical, managerial, engineering, construction, scientific, or like services  Commissions paid  Amounts loaned (see instructions)  Beginning balance  413,763,166 b Ending balance or monthly average  Interest paid  Loan guarantee fees paid  Cother amounts paid (see instructions)  Cother amounts paid (see instructions)  Total. Combine amounts on lines 23 through 35  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.   Describe Reporting Corporation Transactions Between the Reporting Corporation and the Foreign Related Party (see instructions)	27a	Rents paid (for other than intangible property rights)	27a	700,840
Consideration paid for technical, managerial, engineering, construction, scientific, or like services  Commissions paid  Commissions paid  Amounts loaned (see instructions) a Beginning balance 413,763,166 b Ending balance or monthly average  Interest paid  Interest paid  Commissions paid  Interest paid  Interest paid  Comparison paid for insurance or reinsurance  Comparison paid for insurance or monthly average  Comparison paid for insurance  Comparison paid for insurance  Comparison paid for insurance  Comparison paid for insurance  Comparison paid f	b	Royalties paid (for other than intangible property rights)	27b	18,488,094
30	28	Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	28	15,409,992
Amounts loaned (see instructions) a Beginning balance 413,763,166 b Ending balance or monthly average ► 31b 430,387,817  32 Interest paid	29	Consideration paid for technical, managerial, engineering, construction, scientific, or like services	29	54,414,737
Interest paid   Interest pa	30	·	30	2,109,139
Part VI  Part VI  Part VI  Nonmonetary and Less-Than-Full Consideration Section 1.482-Tinable Transactions Between the Reporting Corporation Transactions Between the Reporting Corporation Section 1.482-Tinable Transactions Corporation Transactions Between the Reporting Corporation Corporation and the Foreign Related Party (see instructions)	31	Amounts loaned (see instructions) a Beginning balance413,763,166 b Ending balance or monthly average ▶	31b	430,387,817
34 Loan guarantee fees paid	32	Interest paid	32	35,278,508
Other amounts paid (see instructions)	33	Premiums paid for insurance or reinsurance	33	8,379,321
Total. Combine amounts on lines 23 through 35	34		34	
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)	35		35	
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)		Total. Combine amounts on lines 23 through 35		
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)	Par		,	,
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 on an attached separate sheet any other transaction as defined by Regulation	s sectio	on 1.482-1(i)(7),
Part VI Nonmonetary and Less-Than-Full Consideration Transactions Between the Reporting Corporation and the Foreign Related Party (see instructions)				a disposition
and the Foreign Related Party (see instructions)				·
- , ,	Par		rting C	orporation
Describe these transactions on an attached separate short and shock here.		Describe these transactions on an attached separate sheet and check here.		

Form 5472 (Rev. 12-2021) Page 3 Part VII Additional Information. All reporting corporations must complete Part VII. 37 □ No ☐ 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? . . If "Yes," attach a statement explaining the reason or reasons for such difference. h If the answers to questions 37 and 38a are "Yes," were the documents used to support this treatment of the imported П № 39 During the tax year, was the foreign parent corporation a participant in any cost sharing arrangement (CSA)? . . . . . П No During the tax year, did the reporting corporation pay or accrue any interest or royalty for which the deduction is not 40a ☐ No 1,622,673 b If "Yes," enter the total amount of the disallowed deductions . . . . . . . . . Does the reporting corporation claim a foreign-derived intangible income (FDII) deduction (under section 250) with respect ☐ No If "Yes," enter the amount of gross income derived from sales, leases, exchanges, or other dispositions (but not licenses) of property to the foreign related party that the reporting corporation included in its computation of foreign-derived 65,922,434 If "Yes," enter the amount of gross income derived from a license of property to the foreign related party that the reporting 10,213,779 If "Yes," enter the amount of gross income derived from services provided to the foreign related party that the reporting d 23,875,410 Did the reporting corporation have any loan to or from the related party, to which the safe-haven rate rules of Regulations 42 section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safe-☐ No haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the relevant term)? . . . . . . ☐ Yes Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the tax year or, during the period beginning 36 months before the date of the respective acquisition or distribution ☐ No and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party? Yes If the answer to guestion 43a is "Yes," provide the following. 45,309,650 32,464,174 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.) Provide a brief description of the CSA with respect to which this Part VIII is being completed. 45 l l No ☐ No 46 47 % Enter the total amount of stock-based compensation deductions claimed by the reporting corporation . . . . . . \$ 48a Enter the total amount of deductions for the tax year for stock-based compensation that was granted during the term of the CSA and, at date of grant, is directly identified with, or reasonably allocable to, the intangible development activity under the CSA \$ 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? Enter the amount of intangible development costs allocable to the reporting corporation based on the reporting corporation's Base Erosion Payments and Base Erosion Tax Benefits Under Section 59A (see instructions) Part IX 91,961,210 50 

Amount of total qualified derivative payments as described in section 59A(h) made by the reporting corporation . . .

51

52 53 76,839,651

865,944,589