Form **5471**

(Rev. December 2022)

Department of the Treasury

Information Return of U.S. Persons With Respect to Certain Foreign Corporations

Go to www.irs.gov/Form5471 for instructions and the latest information.

Information furnished for the foreign corporation's annual accounting period (tax year required by section 898) (see instructions) beginning 20 and ending 20

OMB No. 1545-0123

Attachment Sequence No. **121**

Internal Revenue Service	section 898) (see instructions) beginning	, 20	, ar	nd ending	, 20	Ocquerio	5 NO. 121			
Name of person filing this re	eturn		A Ident	ifying number						
Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address			_	gory of filer (See instruction	-					
			1a∐	1b 1c 2 3	4 <u></u> 5a	. <u> </u>				
City or town, state, and ZIP code				the total percentage of the	-	-	-			
			stock	you owned at the end of	its annual ad	ccounting perio	od %			
Filer's tax year beginning	, 20 , and endi	ing		, 20						
	al Form 5471 for the foreign corporation						<u>··-</u>			
	pecified foreign financial assets are reported on this						<u>··</u>			
	m 5471 has been completed using "Alternative Infor					-	<u> </u>			
	ecked, enter the corresponding code for "Alternative	information" (see	nstructi	ons)	· · · ·					
Person(s) on whose bena	alf this information return is filed:		IA) Chaol anni							
(1) Nam	e (2) Addr	ress		(3) Identifying number	(4) Check applicable box(es) Shareholder Officer Director					
					Onarcholac	Onioci	Director			
							+			
						1	1//			
	HKNA									
Important: Fill in all	applicable lines and schedules. All infor	mation must	be in I	English, All amounts	must be	e stated in l	U.S. dollars			
-	herwise indicated.			g			5.0. uou.c			
1a Name and address of				b(1) Emp	oloyer identifi	cation number	, if any			
			1 6							
	DRAF	- F	4 =	b(2) Refe	rence ID nur	mber (see instr	uctions)			
				c Cou	ntry under w	hose laws inco	rporated			
				100						
d Date of incorporation	e Principal place of business f Principal business code num	business activity	g F	Principal business activity	h	Functional cur	rency code			
	A Code Hull			-V64						
2 Provide the following in	nformation for the foreign corporation's accounting p									
a Name, address, and id United States	entifying number of branch office or agent (if any) in	the b If a U	b If a U.S. income tax return was filed, enter:							
Officed States		((i) Taxable income or (loss)			(ii) U.S. income tax paid				
						(after all credits)				
c Name and address of of incorporation	foreign corporation's statutory or resident agent in c		d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation, and the location of such books and records, if different							
		the lo								
Schedule A Stoc	k of the Foreign Corporation									
Concadic A Cicc	K of the foleigh corporation			(b) Number of shares is	sued and ou	tstanding				
(a) Description of each class of stock						———				
(u) Description of each class of stock			(i) Beginning of annual accounting period accounting period							

Form 5471 (Rev. 12-2022)

Schedule B Shareholders of Fore	ign Corporation	
Part I U.S. Shareholders of For	eign Corporation (see instructions)	
(a) Name, address, and identifying number of shareholder	(b) Description of each class of stock held by shareholder. Note: This description and the corresponding description entered in Schedule A, column (a). (c) Number of shares held at beginning of annual accounting period	(e) Pro rata share of subpart F income (enter as a percentage)
INTER	NAL USE ONI	Y
Part II Direct Shareholders of F	oreign Corporation (see instructions)	
(a) Name, address, and identifying number of sha Also, include country of incorporation or formation, if applicable.	eholder. (b) Description of each class of stock held by shareholder. Note: This description should match the corresponding description entered in Schedule A, column (a). (c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period
A	or il 29, 2022	

Page 3

Form 5471 (Rev. 12-2022)

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. generally accepted accounting principles (GAAP). Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for dollar approximate separate transactions method (DASTM) corporations.

				Functional Currency	U.S. Dollars
	1a	Gross receipts or sales	1a		
	b	Returns and allowances	1b		
	С	Subtract line 1b from line 1a	1c		
	2	Cost of goods sold	2		
	3	Gross profit (subtract line 2 from line 1c)	3		
ø.	4	Dividends	4		
Ĕ	5	Interest	5		
Income	6a	Gross rents	6a		
=	b	Gross royalties and license fees	6b		
	7	Net gain or (loss) on sale of capital assets	7		
	8a	Foreign currency transaction gain or loss—unrealized	8a		
	b	Foreign currency transaction gain or loss—realized	8b		
	9	Other income (attach statement)	9		
	10	Total income (add lines 3 through 9)	10		
	11_	Compensation not deducted elsewhere	11		
	12a	Rents	12a		
દ	b	Royalties and license fees	12b		
Deductions	13	Interest	13		
<u>n</u>	14	Depreciation not deducted elsewhere	14		
þ	15	Depletion	15		
	16	Taxes (exclude income tax expense (benefit))	16		
	17	Other deductions (attach statement – exclude income tax expense (benefit))	17		
	18	Total deductions (add lines 11 through 17)	18	_	
•	19	Net income or (loss) before unusual or infrequently occurring items, and			
Net Income		income tax expense (benefit) (subtract line 18 from line 10)	19		
ည်	20	Unusual or infrequently occurring items	20		
ŧ	21a	Income tax expense (benefit)—current	21a		
ž	b	Income tax expense (benefit)—deferred	21b		
	22	Current year net income or (loss) per books (combine lines 19 through 21b)	22		
sive	23a	Foreign currency translation adjustments	23a		
er Tie	b	Other	23b		
Other prehen ncome	С	Income tax expense (benefit) related to other comprehensive income .	23c		
Other Comprehensive Income	24	Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c)	24		

Form 5471 (Rev. 12-2022)

Schedule F Balance Sheet

Important: Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

	Assets		(a) Beginning of annual accounting period	End o	(b) of annual ting period	
1	Cash	1	51		01	
2a	Trade notes and accounts receivable	a l				
b	Less allowance for bad debts	b ()	()	
3		3	,	•	,	
4	Inventories	4				
5		5				
6	· · · · · · · · · · · · · · · · · · ·	6				
7	Investment in subsidiaries (attach statement)	7				
8		В				
9a		a				
b	- · · · · · · · · · · · · · · · · · · ·	b ()	()	
10a		0a				
b	Less accumulated depletion	0b ()	()	
11	Land (net of any amortization)	1				
12	Intangible assets:					
а	Goodwill	2a				
b	Organization costs	2b			V/	
С		2c				
d	Less accumulated amortization for lines 12a, 12b, and 12c	2d ()	()	
13	Other assets (attach statement)	3				
14		4				
	Liabilities and Shareholders' Equity					
15		5				
16	Other current liabilities (attach statement)	6				
17		7				
18		8				
19		9)-)			
20	Capital stock:					
а		0a				
b	<u> </u>	0b				
21	· · · · · · · · · · · · · · · · · · ·	21				
22	<u> </u>	2	,	,		
23	·	23 (24)	()	
24 Sebe	Total liabilities and shareholders' equity	:4				
SCIIC	dule d'Other information				Yes No	
1	During the tax year, did the foreign corporation own at least a 10% interest, direct	lv o	r indirectly in any	foreign	163 140	
•	partnership?	•	• • • •	•		
	If "Yes," see the instructions for required statement.	•				
2	During the tax year, did the foreign corporation own an interest in any trust?					
3	During the tax year, did the foreign corporation own any foreign entities that were					
J	their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign					
	branches (see instructions)?					
	If "Yes," you are generally required to attach Form 8858 for each entity or branch (see					
4a	During the tax year, did the filer pay or accrue any base erosion payment under	sec.	tion 59A(d) to the	foreian		
	corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) v					
	payment made or accrued to the foreign corporation (see instructions)?		•			
	If "Yes," complete lines 4b and 4c.					
b	Enter the total amount of the base erosion payments					
С						
5a	During the tax year, did the foreign corporation pay or accrue any interest or royalty					
	allowed under section 267A?					
	If "Yes," complete line 5b.					
b	Enter the total amount of the disallowed deductions (see instructions)		\$			

	771 (Nev. 12-2022)	<u> </u>	age 5
Sche	dule G Other Information (continued)	1.4	
6a	Is the filer claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation?	Yes	No
b	Enter the amount of gross receipts derived from all sales of general property to the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) \$		
С	Enter the amount of gross receipts derived from all sales of intangible property to the foreign corporation that the filer included in its computation of FDDEI		
d	Enter the amount of gross receipts derived from all services provided to the foreign corporation that the filer included in its computation of FDDEI		
7	During the tax year, was the foreign corporation a participant in any cost sharing arrangement?		
	If the answer to question 7 is "Yes," complete a separate Schedule G-1 for each cost sharing arrangement in which the foreign corporation was a participant during the tax year.		
8	From April 25, 2014, to December 31, 2017, did the foreign corporation purchase stock or securities of a shareholder of the foreign corporation for use in a triangular reorganization (within the meaning of Regulations section 1.358-6(b)(2))?		
9a	Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(d) annual income inclusion for the tax year?		
b	Enter in functional currency the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for		
	the tax year		
10	During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section		
	1.7874-12(a)(9)?		
	If "Yes," see instructions and attach statement.		
11	During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations section 1.6011-4?		
	If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		
12	During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		
13	During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended?		
14	Did you answer "Yes" to any of the questions in the instructions for line 14?		
15	If "Yes," enter the corresponding code(s) from the instructions and attach statement Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)?		
	If "Yes," enter the amount		
16	Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to the current tax year (see instructions)?		
. -	If "Yes," enter the amount		
17a	Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year (see instructions)?		
b	If the answer to question 17a is "Yes," was an election made to close the tax year such that no amount is treated as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)?		
18	Does 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 safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the relevant term)?		
19a	Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the period including the tax year and the preceding 3 tax years, or, during the period beginning 36 months before the date of the respective distribution or acquisition and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party?		
b	If the answer to question 19a is "Yes," provide the following. (1) The amount of such distribution(s) and acquisition(s)		

Form 5471 (Rev. 12-2022) Page **6**

Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name	of U.S. shareholder Identifying number			
1a	Section 964(e)(4) subpart F dividend income from the sale of stock of a lower-tier foreign corporation	1a		
h	(see instructions)	1b		
b		ID		
С	Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c		
d	Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d		
е	Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A)	1e		
f	Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	1f		
g	Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A) .	1g		
h	Other subpart F income (enter result from Worksheet A)	1h		
2	Earnings invested in U.S. property (enter the result from Worksheet B)	2		
3	Reserved for future use	3		
4	Factoring income	4		
	See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.			
5a	Section 245A eligible dividends (see instructions)	5a	_	
b	Extraordinary disposition amounts (see instructions)	5b		7
С	Extraordinary reduction amounts (see instructions)	5c		
d	Section 245A(e) dividends (see instructions).	5d		
е	Dividends not reported on line 5a, 5b, 5c, or 5d	5e		
6	Exchange gain or (loss) on a distribution of previously taxed earnings and profits	6		
	DDALI AG DL		Y	res No
7a	Was any income of the foreign corporation blocked?		.	
b	Did any such income become unblocked during the tax year (see section 964(b))?			
If the a	answer to either question is "Yes," attach an explanation.			
8a	Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign con			
	any time during the tax year (see instructions)?			
b	If the answer to question 8a is "Yes," enter the U.S. shareholder's ED account balance at the beginning			
	\$ and at the end of the tax year \$ Provide an attachment detailing	g any cha	anges	from the
	beginning to the ending balances.			
С	Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of		-	
	\$ and at the end of the tax year \$ Provide an attachment detailin	g any cha	anges	from the
	beginning to the ending balances.			
9	Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions)	\$		