

Form **1118**
 (Rev. December 2013)
 Department of the Treasury
 Internal Revenue Service

Foreign Tax Credit—Corporations

▶ Information about Form 1118 and its separate instructions is at www.irs.gov/form1118.
 ▶ Attach to the corporation's tax return.

OMB No. 1545-0122

For calendar year 20____, or other tax year beginning _____, 20____, and ending _____, 20____

Name of corporation _____

Employer identification number _____

Use a **separate** Form 1118 for each applicable category of income listed below. See **Categories of Income** in the instructions. Also, see **Specific Instructions**.
 Check only one box on each form.

- Passive Category Income Section 901(j) Income: Name of Sanctioned Country ▶ _____
- General Category Income Income Re-sourced by Treaty: Name of Country ▶ _____

Schedule A **Income or (Loss) Before Adjustments** (Report all amounts in U.S. dollars. See **Specific Instructions**.)

1. Foreign Country or U.S. Possession (Enter two-letter code; see instructions. Use a separate line for each.) *	Gross Income or (Loss) From Sources Outside the United States (INCLUDE Foreign Branch Gross Income here and on Schedule F)							8. Total (add columns 2(a) through 7)	
	2. Deemed Dividends (see instructions)		3. Other Dividends		4. Interest	5. Gross Rents, Royalties, and License Fees	6. Gross Income From Performance of Services		7. Other (attach schedule)
	(a) Exclude gross-up	(b) Gross-up (sec. 78)	(a) Exclude gross-up	(b) Gross-up (sec. 78)					
A									
B									
C									
D									
E									
F									
Totals (add lines A through F)									

* For section 863(b) income, NOLs, income from RICs, and high-taxed income, use a single line (see instructions).

9. Definitely Allocable Deductions					10. Apportioned Share of Deductions Not Definitely Allocable (enter amount from applicable line of Schedule H, Part II, column (d))	11. Net Operating Loss Deduction	12. Total Deductions (add columns 9(e) through 11)	13. Total Income or (Loss) Before Adjustments (subtract column 12 from column 8)
Rental, Royalty, and Licensing Expenses		(c) Expenses Related to Gross Income From Performance of Services	(d) Other Definitely Allocable Deductions	(e) Total Definitely Allocable Deductions (add columns 9(a) through 9(d))				
(a) Depreciation, Depletion, and Amortization	(b) Other Expenses							
A								
B								
C								
D								
E								
F								
Totals								

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 10900F

Form **1118** (Rev. 12-2013)

Schedule B Foreign Tax Credit (Report all foreign tax amounts in U.S. dollars.)

Part I—Foreign Taxes Paid, Accrued, and Deemed Paid (see instructions)

Table with 3 main sections: 1. Credit is Claimed for Taxes (check one); 2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used); 3. Tax Deemed Paid (from Schedule C—Part I, column 12, Part II, column 8(b), and Part III, column 8)).

Part II—Separate Foreign Tax Credit (Complete a separate Part II for each applicable category of income.)

Table with 12 rows for separate foreign tax credit calculations, including lines 1a through 12. Includes a large watermark: 'INTERNAL USE ONLY DRAFT AS OF May 17, 2013'.

Part III—Summary of Separate Credits (Enter amounts from Part II, line 12 for each applicable category of income. Do not include taxes paid to sanctioned countries.)

Table with 6 rows for summary of separate credits, including lines 1 through 6.

Schedule C Tax Deemed Paid by Domestic Corporation Filing Return

Use this schedule to figure the tax deemed paid by the corporation with respect to dividends from a first-tier foreign corporation under section 902(a), and deemed inclusions of earnings from a first- or lower-tier foreign corporation under section 960(a). **Report all amounts in U.S. dollars unless otherwise specified.**

Part I—Dividends and Deemed Inclusions From Post-1986 Undistributed Earnings

1a. Name of Foreign Corporation (identify DISCs and former DISCs)	1b. EIN (if any) of the foreign corporation	1c. Reference ID number (see instructions)	2. Tax Year End (Yr-Mo) (see instructions)	3. Country of Incorporation (enter country code from instructions)	4. Post-1986 Undistributed Earnings (in functional currency — attach schedule)	5. Opening Balance in Post-1986 Foreign Income Taxes	6. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated	
							(a) Taxes Paid	(b) Taxes Deemed Paid (from Schedule D, Part I — see instructions)
7. Post-1986 Foreign Income Taxes (add columns 5, 6(a), and 6(b))	8. Dividends and Deemed Inclusions		9. Divide Column 8(a) by Column 4	10. Multiply column 7 by column 9	11. Section 960(c) Limitation	12. Tax Deemed Paid (subtract column 11 from column 10)		
	(a) Functional Currency	(b) U.S. Dollars						

Total (Add amounts in column 12. Enter the result here and include on "Totals" line of Schedule B, Part I, column 3.) ▶

Schedule C Tax Deemed Paid by Domestic Corporation Filing Return (Continued)

Part II—Dividends Paid Out of Pre-1987 Accumulated Profits

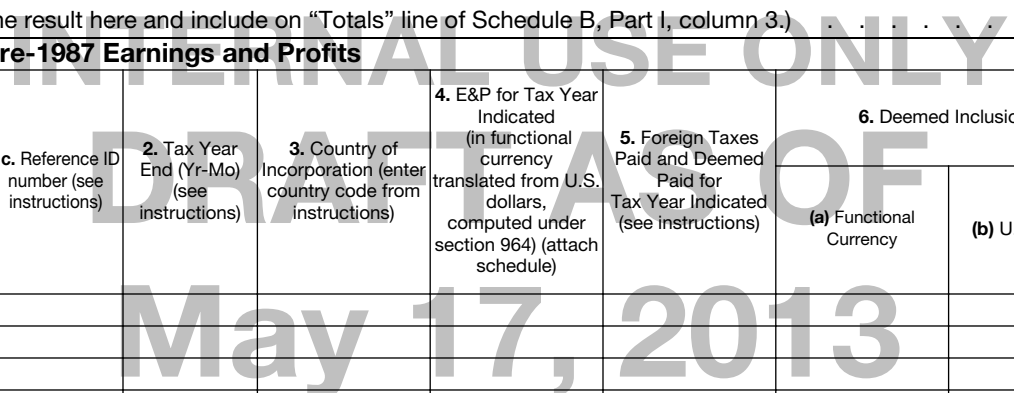
1a. Name of Foreign Corporation (identify DISCs and former DISCs)	1b. EIN (if any) of the foreign corporation	1c. Reference ID number (see instructions)	2. Tax Year End (Yr-Mo) (see instructions)	3. Country of Incorporation (enter country code from instructions)	4. Accumulated Profits for Tax Year Indicated (in functional currency computed under section 902) (attach schedule)	5. Foreign Taxes Paid and Deemed Paid on Earnings and Profits (E&P) for Tax Year Indicated (in functional currency) (see instructions)	6. Dividends Paid		7. Divide Column 6(a) by Column 4	8. Tax Deemed Paid (see instructions)	
							(a) Functional Currency	(b) U.S. Dollars		(a) Functional Currency	(b) U.S. Dollars

Total (Add amounts in column 8b. Enter the result here and include on "Totals" line of Schedule B, Part I, column 3.) ▶

Part III—Deemed Inclusions From Pre-1987 Earnings and Profits

1a. Name of Foreign Corporation (identify DISCs and former DISCs)	1b. EIN (if any) of the foreign corporation	1c. Reference ID number (see instructions)	2. Tax Year End (Yr-Mo) (see instructions)	3. Country of Incorporation (enter country code from instructions)	4. E&P for Tax Year Indicated (in functional currency translated from U.S. dollars, computed under section 964) (attach schedule)	5. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated (see instructions)	6. Deemed Inclusions		7. Divide Column 6(a) by Column 4	8. Tax Deemed Paid (multiply column 5 by column 7)
							(a) Functional Currency	(b) U.S. Dollars		

Total (Add amounts in column 8. Enter the result here and include on "Totals" line of Schedule B, Part I, column 3.) ▶



Schedule D Tax Deemed Paid by First- and Second-Tier Foreign Corporations under Section 902(b)

Use Part I to compute the tax deemed paid by a first-tier foreign corporation with respect to dividends from a second-tier foreign corporation. Use Part II to compute the tax deemed paid by a second-tier foreign corporation with respect to dividends from a third-tier foreign corporation. **Report all amounts in U.S. dollars unless otherwise specified.**

Part I—Tax Deemed Paid by First-Tier Foreign Corporations

Section A—Dividends Paid Out of Post-1986 Undistributed Earnings (Include the column 10 results in Schedule C, Part I, column 6(b).)

1a. Name of Second-Tier Foreign Corporation and Its Related First-Tier Foreign Corporation		1b. EIN (if any) of the second-tier foreign corporation	1c. Reference ID number (see instructions)	2. Tax Year End (Yr-Mo) (see instructions)	3. Country of Incorporation (enter country code from instructions)	4. Post-1986 Undistributed Earnings (in functional currency—attach schedule)	5. Opening Balance in Post-1986 Foreign Income Taxes
6. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated		7. Post-1986 Foreign Income Taxes (add columns 5, 6(a), and 6(b))		8. Dividends Paid (in functional currency)		9. Divide Column 8(a) by Column 4	10. Tax Deemed Paid (multiply column 7 by column 9)
(a) Taxes Paid	(b) Taxes Deemed Paid (see instructions)	(a) of Second-tier Corporation	(b) of First-tier Corporation				

Section B—Dividends Paid Out of Pre-1987 Accumulated Profits (Include the column 8(b) results in Schedule C, Part I, column 6(b).)

1a. Name of Second-Tier Foreign Corporation and Its Related First-Tier Foreign Corporation	1b. EIN (if any) of the second-tier foreign corporation	1c. Reference ID number (see instructions)	2. Tax Year End (Yr-Mo) (see instructions)	3. Country of Incorporation (enter country code from instructions)	4. Accumulated Profits for Tax Year Indicated (in functional currency—attach schedule)	5. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated (in functional currency—see instructions)	6. Dividends Paid (in functional currency)		7. Divide Column 6(a) by Column 4	8. Tax Deemed Paid (see instructions)	
							(a) of Second-tier Corporation	(b) of First-tier Corporation		(a) Functional Currency of Second-tier Corporation	(b) U.S. Dollars

Schedule D Tax Deemed Paid by First- and Second-Tier Foreign Corporations under Section 902(b) (Continued)

Part II—Tax Deemed Paid by Second-Tier Foreign Corporations

Section A—Dividends Paid Out of Post-1986 Undistributed Earnings (Include the column 10 results in Section A, column 6(b), of Part I above.)

1a. Name of Third-Tier Foreign Corporation and Its Related Second-Tier Foreign Corporation		1b. EIN (if any) of the third-tier foreign corporation	1c. Reference ID number (see instructions)	2. Tax Year End (Yr-Mo) (see instructions)	3. Country of Incorporation (enter country code from instructions)	4. Post-1986 Undistributed Earnings (in functional currency—attach schedule)	5. Opening Balance in Post-1986 Foreign Income Taxes
6. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated		7. Post-1986 Foreign Income Taxes (add columns 5, 6(a), and 6(b))		8. Dividends Paid (in functional currency)		9. Divide Column 8(a) by Column 4	10. Tax Deemed Paid (multiply column 7 by column 9)
(a) Taxes Paid	(b) Taxes Deemed Paid (from Schedule E, Part I, column 10)	(a) of Third-tier Corporation	(b) of Second-tier Corporation	(a) of Third-tier Corporation	(b) of Second-tier Corporation		

Section B—Dividends Paid Out of Pre-1987 Accumulated Profits (Include the column 8(b) results in Section A, column 6(b), of Part I above.)

1a. Name of Third-Tier Foreign Corporation and Its Related Second-Tier Foreign Corporation	1b. EIN (if any) of the third-tier foreign corporation	1c. Reference ID number (see instructions)	2. Tax Year End (Yr-Mo) (see instructions)	3. Country of Incorporation (enter country code from instructions)	4. Accumulated Profits for Tax Year Indicated (in functional currency—attach schedule)	6. Dividends Paid (in functional currency)		7. Divide Column 6(a) by Column 4	8. Tax Deemed Paid (see instructions)	
						(a) of Third-tier Corporation	(b) of Second-tier Corporation		(a) In Functional Currency of Third-tier Corporation	(b) U.S. Dollars

Schedule E Tax Deemed Paid by Certain Third-, Fourth-, and Fifth-Tier Foreign Corporations Under Section 902(b)

Use this schedule to report taxes deemed paid with respect to dividends from eligible post-1986 undistributed earnings of fourth-, fifth- and sixth-tier controlled foreign corporations. **Report all amounts in U.S. dollars unless otherwise specified.**

Part I—Tax Deemed Paid by Third-Tier Foreign Corporations (Include the column 10 results in Schedule D, Part II, Section A, column 6(b).)

1a. Name of Fourth-Tier Foreign Corporation and Its Related Third-Tier Foreign Corporation		1b. EIN (if any) of the fourth-tier foreign corporation	1c. Reference ID number (see instructions)	2. Tax Year End (Yr-Mo) (see instructions)	3. Country of Incorporation (enter country code from instructions)	4. Post-1986 Undistributed Earnings (in functional currency—attach schedule)	5. Opening Balance in Post-1986 Foreign Income Taxes
6. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated		7. Post-1986 Foreign Income Taxes (add columns 5, 6(a), and 6(b))	8. Dividends Paid (in functional currency)		9. Divide Column 8(a) by Column 4	10. Tax Deemed Paid (multiply column 7 by column 9)	
(a) Taxes Paid	(b) Taxes Deemed Paid (from Part II, column 10)		(a) of Fourth-tier CFC	(b) of Third-tier CFC			

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Schedule E Tax Deemed Paid by Certain Third-, Fourth-, and Fifth-Tier Foreign Corporations Under Section 902(b) (Continued)

Part II—Tax Deemed Paid by Fourth-Tier Foreign Corporations (Include the column 10 results in column 6(b) of Part I above.)

1a. Name of Fifth-Tier Foreign Corporation and Its Related Fourth-Tier Foreign Corporation		1b. EIN (if any) of the fifth-tier foreign corporation	1c. Reference ID number (see instructions)	2. Tax Year End (Yr-Mo) (see instructions)	3. Country of Incorporation (enter country code from instructions)	4. Post-1986 Undistributed Earnings (in functional currency—attach schedule)	5. Opening Balance in Post-1986 Foreign Income Taxes
6. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated		7. Post-1986 Foreign Income Taxes (add columns 5, 6(a), and 6(b))	8. Dividends Paid (in functional currency)		9. Divide Column 8(a) by Column 4	10. Tax Deemed Paid (multiply column 7 by column 9)	
(a) Taxes Paid	(b) Taxes Deemed Paid (from Part III, column 10)		(a) of Fifth-tier CFC	(b) of Fourth-tier CFC			

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May 17, 2018

Part III—Tax Deemed Paid by Fifth-Tier Foreign Corporations (Include the column 10 results in column 6(b) of Part II above.)

1a. Name of Sixth-Tier Foreign Corporation and Its Related Fifth-Tier Foreign Corporation		1b. EIN (if any) of the sixth-tier foreign corporation	1c. Reference ID number (see instructions)	2. Tax Year End (Yr-Mo) (see instructions)	3. Country of Incorporation (enter country code from instructions)	4. Post-1986 Undistributed Earnings (in functional currency—attach schedule)	5. Opening Balance in Post-1986 Foreign Income Taxes
6. Foreign Taxes Paid for Tax Year Indicated		7. Post-1986 Foreign Income Taxes (add columns 5 and 6)	8. Dividends Paid (in functional currency)		9. Divide Column 8(a) by Column 4	10. Tax Deemed Paid (multiply column 7 by column 9)	
			(a) of Sixth-tier CFC	(b) of Fifth-tier CFC			

Schedule F Gross Income and Definitely Allocable Deductions for Foreign Branches			Schedule G Reductions of Taxes Paid, Accrued, or Deemed Paid	
1. Foreign Country or U.S. Possession (Enter two-letter code from Schedule A, column 1. Use a separate line for each.)			2. Gross Income	
3. Definitely Allocable Deductions				
A			A	Reduction of Taxes Under Section 901(e)—Attach separate schedule
B			B	Reduction of Foreign Oil and Gas Taxes—Enter amount from Schedule I, Part II, line 4
C			C	Reduction of Taxes Due to International Boycott Provisions—Enter appropriate portion of Schedule C (Form 5713), line 2b. Important: Enter only “specifically attributable taxes” here.
D			D	Reduction of Taxes for Section 6038(c) Penalty—Attach separate schedule
E			E	Taxes suspended under section 909
F			F	Other Reductions of Taxes—Attach schedule(s)
Totals (add lines A through F)* ▶			Total (add lines A through F). Enter here and on Schedule B, Part II, line 3 ▶	
			Part II - Other Information	
			During the tax year, did the corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)? <input type="checkbox"/>	

* **Note:** The Schedule F totals are not carried over to any other Form 1118 Schedule. (These totals were already included in Schedule A.) However, the IRS requires the corporation to complete Schedule F under the authority of section 905(b).

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May 17, 2013

Schedule H Apportionment of Deductions Not Definitely Allocable *(complete only once)*

Part I—Research and Development Deductions

	(a) Sales Method				(b) Gross Income Method — Check method used: <input type="checkbox"/> Option 1 <input type="checkbox"/> Option 2				(c) Total R&D Deductions Not Definitely Allocable (enter the sum of all amounts entered in all applicable "R&D Deductions" columns)
	Product line #1 (SIC Code:) *		Product line #2 (SIC Code:) *		Product line #1 (SIC Code:) *		Product line #2 (SIC Code:) *		
	(i) Gross Sales	(ii) R&D Deductions	(iii) Gross Sales	(iv) R&D Deductions	(v) Gross Income	(vi) R&D Deductions	(vii) Gross Income	(viii) R&D Deductions	
1 Totals (see instructions)									
2 Total to be apportioned									
3 Apportionment among statutory groupings:									
a General category income									
b Passive category income									
c Section 901(j) income*									
d Income re-sourced by treaty*									
4 Total foreign (add lines 3a through 3d)									

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May 17, 2013

* Important: See **Computer-Generated Schedule H** in instructions.

Schedule H Apportionment of Deductions Not Definitely Allocable *(continued)*

Part II—Interest Deductions, All Other Deductions, and Total Deductions

	(a) Average Value of Assets—Check method used: <input type="checkbox"/> Fair market value <input type="checkbox"/> Tax book value <input type="checkbox"/> Alternative tax book value		(b) Interest Deductions		(c) All Other Deductions Not Definitely Allocable	(d) Totals (add the corresponding amounts from column (c), Part I; columns (b)(iii) and (b)(iv), Part II; and column (c), Part II). Enter each amount from lines 3a through 3d below in column 10 of the corresponding Schedule A.
	(i) Nonfinancial Corporations	(ii) Financial Corporations	(iii) Nonfinancial Corporations	(iv) Financial Corporations		
1a Totals (see instructions)						
b Amounts specifically allocable under Temp. Regs. 1.861-10T(e)						
c Other specific allocations under Temp. Regs. 1.861-10T						
d Assets excluded from apportionment formula						
2 Total to be apportioned (subtract the sum of lines 1b, 1c, and 1d from line 1a)						
3 Apportionment among statutory groupings:						
a General category income						
b Passive category income						
c Section 901(j) income*						
d Income re-sourced by treaty*						
4 Total foreign (add lines 3a through 3d)						

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May 17, 2013

* Important: See **Computer-Generated Schedule H** in instructions.