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- Go to www.irs.gov/Form1120FSC for instructions and the latest information.

Department of the Treasury Internal Revenue Service
 FSC Information


If "Yes," and the principal shareholder (described in 1 above) is not the common parent of the group, complete lines 2 a through 2 g below for the common parent (see instructions).

| a Name of common parent | b Identification number |  |  |
| :--- | :--- | :--- | :--- |
| c Address (number, street, and room or suite no., city or town, state, ZIP code, or country) | d Total assets (consolidated, if applicable) <br> e Percentage of voting stock of the common parent <br>  | f Tax year ends (month and year) | g Service Center where tax return is filed |

## 3 Administrative pricing rules

a Check the applicable box(es) to show the pricing rule(s) used to determine taxable income on transactions resulting in foreign trading gross receipts.
(1) $\square \quad 1.83 \%$ of foreign trading gross receipts
(2) $\square \quad 23 \%$ of combined taxable income
(3) $\square$ Marginal costing
(4) $\square$ Section 482 method
(5) $\square$ Transactions at arm's length with unrelated supplier(s)
b If the FSC and the related supplier(s) meet the payment rules of Temporary Regulations section 1.925(a)-1T(b)(2)(ii) and elect to use the administrative pricing rules, check here

Tax and Payments (see instructions)


## Schedule A $\quad$ Cost of Goods Sold Related to Foreign Trading Gross Receipts (see instructions)

1 Inventory at beginning of year

2 Purchases
3 Cost of labor .
4 Additional section 263A costs (attach schedule)
5 Other costs (attach schedule)
6 Total. Add lines 1 through 5 .
7 Inventory at end of year
8 Cost of goods sold. Subtract line 7 from line 6. Enter here and on line 7 of Schedule B. Small FSCs, see instructions for Schedule A

| $\|c\|$ | (a) Using administrative pricing rules |  |  |  |
| :---: | :--- | :--- | :--- | :--- |
| 1 | (b) Not using administrative pricing rules |  |  |  |
| 1 |  |  |  |  |
| 2 |  |  |  |  |
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| 4 |  |  |  |  |
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| 6 |  |  |  |  |
| 7 |  |  |  |  |
| 8 |  |  |  |  |
| 8 |  |  |  |  |

9a Check all methods used for valuing closing inventory: (1) $\square$ Cost as described in Regulations section 1.471-3
(2) $\square$ Lower of cost or market as described in Regulations section 1.471-4
(3) $\square$ Other (Specify method used and attach explanation.)
b Check if there was a writedown of subnormal goods as described in Regulations section 1.471-2(c)
c Check if the LIFO inventory method was adopted this tax year for any goods. (If checked, attach Form 970.)

d If the LIFO inventory method was used for this tax year, enter percentage (or amounts) of closing inventory computed under LIFO
e If property is produced or acquired for resale, do the rules of section 263A apply to the FSC?
$\square$
$f$ Was there any change in determining quantities, cost, or valuations between opening and closing inventory?
If "Yes," attach explanation
Additional Information (see instructions). Note: Small FSCs, complete lines 1 through 8f only.

1 See the instructions and enter the FSC's:
a Business activity code no.
b Business activity
$\qquad$
c Product or service
2 Enter the amount of tax-exempt interest received or accrued during the tax year $\quad \$$
3 At any time during the tax year was the FSC engaged in a trade or business in the United States?

4 During the tax year, did the FSC own any foreign entity that was disregarded as an entity separate from its owner under Regulations sections 301.7701-2 and 301.7701-3?

If "Yes," attach a statement listing the name, country under whose laws the entity was organized, and EIN (if any) of each such entity.

5 During the tax year, did the FSC own at least a 10\% interest, directly or indirectly, in any foreign partnership? If "Yes," see the instructions for required attachment.
6 If the FSC has an NOL for the tax year and is electing to forego the carryback period, check here (see instructions)

7 Enter the available NOL carryover from prior tax years. (Do not reduce it by any deduction on Schedule B, Part II, line 19a.).
|\$
8 FSC qualification rules (see instructions):
a Enter the largest number of shareholders the FSC had at any time during the tax year
b Did the FSC have any preferred stock outstanding at any time during the tax year?
c During the tax year, did the FSC maintain an office in a qualifying foreign country or U.S. possession in which a complete set of books and records was maintained?
d During the tax year did the FSC maintain the records required under section 6001 at a location within the U.S.?
e At all times during the tax year, did the FSC have at least one non-U.S. resident on its board of directors?

f Small FSCs only: Check the applicable box if during the tax year the small FSC was a member of a controlled group of corporations that included a $\square$ DISC or a $\square$ FSC.
$g$ Check the applicable box if during the tax year the FSC was a member of a controlled group of corporations that included a $\square$ DISC or a $\square$ FSC.
9 Foreign management rules (does not apply to small FSCs):
a Did all formally convened meetings of the board of directors and of the shareholders occur outside the U.S.?
b (1) Were all cash dividends, legal and accounting fees, salaries of officers, and salaries or fees of members of the board of directors disbursed from bank accounts maintained outside the United States? (If "Yes," these accounts are considered to be the FSC's principal bank accounts.)
(2) At all times during the tax year, did the FSC maintain its principal bank accounts in a qualifying foreign country or U.S. possession (see instructions)?
Name of bank(s)
Account number(s)


10 Foreign economic process rules (does not apply to small FSCs):
a Check the applicable box if the FSC is electing to group transactions from its sales activities (Regulations section 1.924(d)-1(c)(5)):Customer groupingContract grouping
Product or product line groupingProduct or product line subgroupings
b Check the applicable box(es) to indicate how the FSC met the foreign direct costs requirement (see instructions):
$\square$ The FSC (or any person under contract with the FSC) met the 50\% test of section 924(d)(1).
$\square$ The FSC (or any person under contract with the FSC) met the alternative $85 \%$ test of section 924(d)(2). Check to indicate the subparagraphs of section 924(e) for which this alternative test was met:
(e)(1)
(e)(2)
(e)(3)
(e)(4)
(e)(5)
c If box $(e)(5)$ is checked, enter which of the five methods listed in Regulations section 1.924(e)-1(e)(1)(i) through (v) describes how the FSC bears the economic risk of nonpayment
d Check the applicable box if the FSC is electing to group its foreign direct costs on one of the following (Regulations section 1.924(d)-1(e)):

1 Sale, exchange, or other disposition of export property. (Enter 50\% of military property sales. Include the other $50 \%$ on Schedule F, line 1.)
2 Lease or rental of export property for use outside the United States
3 Services related and subsidiary to:
a Sale, exchange, or other disposition of export property. (Enter $50 \%$ of services related to the sale or other disposition of military property. Include the other $50 \%$ on Schedule F, line 1.)
b Lease or rental of export property
4 Engineering or architectural services for construction projects outside the U.S.
5 Managerial services for an unrelated FSC or IC-DISC (see instructions)
6a Total foreign trading gross receipts. Add lines 1 through 5
Small FSCs: Complete lines $6 b$ through 6 h.
b Small FSC limitation (section 924(b)(2)(B))
c Controlled group member's share of line $6 b$
d Enter 1. (Short tax year: Divide the number of days in the short tax year by the number of days in the full tax year. Enter as a decimal less than 1.00000.)
e Multiply line 6b or line 6c (whichever applies) by line 6d
f Total of line 6a, columns (a) and (b)
Note: See the instructions for line $6 f$ if commission income is included on line 6a.
$g$ Enter the smaller of line 6 e or line 6 f . Note: If line $6 f$ exceeds line $6 e$, enter the excess on line 7 of Schedule $F$

h Allocate the amount from line 6 g to columns (a) and (b) (see instructions).
7 Cost of goods sold (Schedule A, line 8). (Small FSCs, enter only the part of cost of goods sold from the receipts on line 6h above. See instructions for Schedule A.)
8 Foreign trade income. Subtract line 7 from line 6a or line 6h (whichever applies)
9a Exemption percentage from Schedule E, line 3d
b Exemption percentage from Schedule E, line 2d
10 Exempt foreign trade income. Multiply line 8, column (a) by line 9a and line 8, column (b) by line 9b
11 Nonexempt foreign trade income. Subtract line 10 from line 8.
12 Deductions attributable to nonexempt foreign trade income. Enter amount from Schedule G, line 18 .
13 Net income attributable to nonexempt foreign trade income. Subtract line 12 from line 11
14 Net income attributable to nonexempt foreign trade income from Schedule $F$, line 6
15 Total net income attributable to nonexempt foreign trade income. Add lines 13 and 14

| $6 h$ |  |  |  |  |
| :---: | :--- | :--- | :--- | :--- |
|  |  |  |  |  |
| 7 |  |  |  |  |
| 8 |  |  |  |  |
| $9 a$ |  |  |  |  |
| $9 b$ |  |  |  |  |
| 10 |  |  |  |  |
| 11 |  |  |  |  |
| 12 |  |  |  |  |
| 13 |  |  |  |  |
| 14 |  |  |  |  |
| 15 |  |  |  |  |
| 15 |  |  |  |  |

## Part II-Taxable Income or (Loss)

16 Taxable income from foreign trade income. Enter total of line 15, columns (a) and (b), minus any nontaxable income included in line 15, column (b). Attach a schedule that shows the computation of the taxable and nontaxable income included on line 15, column (b)
17 Taxable nonforeign trade income from Schedule F, line 19
18 Taxable income or (loss) before net operating loss deduction and dividends-received deduction. Add lines 16 and 17

| 16 |  |  |
| :---: | :---: | :---: |
| 17 |  |  |
| 18 |  |  |
| 19c |  |  |
| 20 |  |  |

Schedule E Exemption Percentages Used in Figuring Exempt Foreign Trade Income (see instructions)
Note: If all shareholders of the FSC are C corporations, enter . 30000 on line 2d and . 65217 on line 3d and skip all other lines.
If all shareholders of the FSC are other than C corporations, enter .32000 on line 2d and .69565 on line 3d and skip all other lines.
1 Percentage (round to at least five decimal places) of voting stock owned by shareholders that are C corporations
2 Exemption percentage for foreign trade income determined by not using the administrative pricing rules:
a Difference between section 923(a)(2) and section 291(a)(4)(A) percentage
b Section 923(a)(2) percentage

c Multiply line 1 by line 2a
d Exemption percentage. Subtract line 2c from line 2b. Enter here and on Schedule B, line 9b, and on Schedule G, line 16b
3 Exemption percentage for foreign trade income determined using administrative pricing rules:
a Difference between section 923(a)(3) fraction and section 291(a)(4)(B) fraction (16/23-15/23 = $1 / 23$ ) shown as a decimal
b Section 923(a)(3) fraction (16/23) shown as a decimal
c Multiply line 1 by line 3a
d Exemption percentage. Subtract line 3 c from line 3b. Enter here and on Schedule B, line 9a, and on Schedule G, line 16a

| $\mathbf{1}$ |  |
| :---: | :---: |
| $\mathbf{2 a}$ | .02000 |
| $\mathbf{2 b}$ | .32000 |
| $\mathbf{2 c}$ |  |
| $\mathbf{2 d}$ |  |
|  |  |
| 3a | .04348 |
| 3b | .69565 |
| 3c |  |
| 3d |  |

## Schedule F Net Income From Nonexempt Foreign Trade Income and Taxable Nonforeign Trade Income (see instructions) <br> Part I-Net Income From Nonexempt Foreign Trade Income

1 Enter $50 \%$ of total receipts from the sale, exchange, or other disposition of military property and related services
2 International boycott income
3 Illegal bribes and other payments
4 Total. Add lines 1, 2, and 3
5 Cost of goods sold and other costs related to above income (attach schedule)
6 Net income from nonexempt foreign trade income. Subtract line 5 from line 4. Enter here and on Schedule B, line 14, columns (a) and (b)

| (a) Using administrative <br> pricing rules |  |  | (b) Not using administrative <br> pricing rules |  |
| :--- | :--- | :--- | :--- | :--- |
| 1 |  |  |  |  |
| 2 |  |  |  |  |
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| 5 |  |  |  |  |
| 6 |  |  |  |  |

## Part II-Taxable Nonforeign Trade Income

7 Small FSCs: If line 6f, Schedule B, is greater than line 6e, Schedule B, enter the excess here .
8 Interest

9 Dividends (attach schedule-see instructions)
10 Carrying charges
11 Royalties
12 Other investment income
13 Receipts excluded under section 924(f) on the basis of use, subsidized receipts, and receipts from related parties
14 Income from excluded property under sections 927(a)(2) and (3)
15 Income from transactions that did not meet the Foreign economic process rules (see instructions). (See Foreign Trading Gross Receipts in the instructions.)
16 Other income
17 Total. Add lines 7 through 16
18 Enter deductions allocated or apportioned to line 17 income. (Attach schedule. Small FSCs also include the cost of goods sold deduction attributable to the amount entered on line 7 above)
19 Taxable nonforeign trade income. Subtract line 18 from line 17. Enter here and on Schedule B, line 17

| 7 |  |  |
| :---: | :--- | :--- |
| 8 |  |  |
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| 18 |  |  |
| 19 |  |  |

## Schedule G Deductions Allocated or Apportioned to Foreign Trade Income Other Than Foreign Trade Income Reported on Schedule F (See instructions for limitations on deductions before completing lines 1 through 14.)

1 Foreign direct costs described in section 924(e):
a Advertising and sales promotion
b Certain processing and arranging costs
c Certain transportation costs
d Certain determination and transmittal costs
e Assumption of credit risk.
f Total foreign direct costs. Add lines 1a through 1e.
2 Advertising
3 Interest
4 Depreciation from Form 4562 (less any depreciation claimed elsewhere on this return) (attach Form 4562)
5 Salaries and wages
6 Rents
7 Sales commissions
8 Warehousing
9 Freight.
10 Compensation of officers
11 Bad debts
12 Pension, profit-sharing, etc., plans
13 Employee benefit programs
14 Other deductions (attach list)
15 Total deductions. Add lines 1 f through 14
16a Exemption percentage from Schedule E, line 3d
b Exemption percentage from Schedule E, line 2d
17 Deductions attributable to exempt foreign trade income. Multiply line 15, column (a) by line 16a and enter the result in column (a). Multiply line 15, column (b) by line 16b and enter the result in column (b)

18 Deductions allocated or apportioned to nonexempt foreign trade income other than foreign trade income reported on Schedule F. Subtract line 17 from line 15. Enter here and on Schedule B, line 12, columns (a) and (b)

| (a) Using administrative <br> pricing rules |  |  | (b) <br> Not using administrative <br> pricing rules |  |
| :---: | :--- | :--- | :--- | :--- |
| 1a |  |  |  |  |
| 1b |  |  |  |  |
| 1c |  |  |  |  |
| 1d |  |  |  |  |
| 1e |  |  |  |  |
| 1f |  |  |  |  |
| 2 |  |  |  |  |
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| 12 |  |  |  |  |
| 13 |  |  |  |  |
| 14 |  |  |  |  |
| 15 |  |  |  |  |
| $16 a$ |  |  |  |  |
| $16 b$ |  |  |  |  |
|  |  |  |  |  |
| 17 |  |  |  |  |
|  |  |  |  |  |
| 18 |  |  |  |  |

Schedule J Tax Computation (see instructions)
Check if the FSC is a member of a controlled group (see section 927(d)(4)) (attach Schedule O (Form 1120)) $\square$
2 Income tax
3 Base erosion minimum tax (attach Form 8991)
4 Add lines 2 and 3
5 Foreign tax credit (attach Form 1118)
6 Total tax. Subtract line 5 from line 4. Enter here and on line 1, page 1


