# - Attach to Form 965. <br> - Go to www.irs.gov/Form965 for instructions and the latest information. 

internal Revenue Service

## SECTION 1-Amounts Reported on Forms 1116 and 1118 and Disallowed Foreign Taxes



SECTION 2-Applicable Percentage for Disallowance of Foreign Tax Credit Not From Pass-Throughs

| 2018 Tax Year Applicable Percentage |  |  | 2018 Tax Year |
| :---: | :---: | :---: | :---: |
| 29 | Portion of the aggregate 2018 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 12 | 29 |  |
| 30 | Total section 965(a) inclusion amount. Enter the sum of Form 965, Part II, section 1, lines 9 and 12 | 30 |  |
| 31 | Divide line 29 by line 30 | 31 |  |
| 32 | Applicable percentage with respect to the portion of the aggregate 2018 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Multiply line 31 by 0.771 | 32 |  |
| 33 | Portion of the aggregate 2018 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 9 | 33 |  |
| 34 | Total section 965(a) inclusion amount. <br> Enter the sum of Form 965, Part II, section 1, lines 9 and 12 | 34 |  |
| 35 | Divide line 33 by line 34 | 35 |  |
| 36 | Applicable percentage with respect to the portion of the aggregate 2018 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Multiply line 35 by 0.557 | 36 |  |
| 37 | 2018 Applicable Percentage. <br> Add lines 32 and 36 | 37 |  |
|  | 2017 Tax Year Applicable Percentage |  | 2017 Tax Year |
| 38 | Portion of the aggregate 2017 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 23 | 38 |  |
| 39 | Total section 965(a) inclusion amount. <br> Enter the sum of Form 965, Part II, section 1, lines 20 and 23 | 39 |  |
| 40 | Divide line 38 by line 39 | 40 |  |
| 41 | Applicable percentage with respect to the portion of the aggregate 2017 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Multiply line 40 by 0.771 | 41 |  |
| 42 | Portion of the aggregate 2017 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 20 | 42 |  |
| 43 | Total section 965(a) inclusion amount. <br> Enter the sum of Form 965, Part II, section 1, lines 20 and 23. | 43 |  |
| 44 | Divide line 42 by line 43 | 44 |  |
| 45 | Applicable percentage with respect to the portion of the aggregate 2017 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Multiply line 44 by 0.557 | 45 |  |
| 46 | 2017 Applicable Percentage. <br> Add lines 41 and 45 | 46 |  |

