

**Note:** *The draft you are looking for begins on the next page.*



## **Caution: *DRAFT—NOT FOR FILING***

This is an early release draft of an IRS tax form, instructions, or publication, which the IRS is providing for your information. **Do not file draft forms** and do **not** rely on draft forms, instructions, and publications for filing. We generally do not release draft forms until we believe we have incorporated all changes, but sometimes unexpected issues arise, or legislation is passed. Also, forms generally are subject to OMB approval before they can be officially released. Drafts of instructions and publications usually have some changes before their final release.

Early release drafts are at [IRS.gov/DraftForms](https://www.irs.gov/DraftForms) and may remain there even after the final release is posted at [IRS.gov/LatestForms](https://www.irs.gov/LatestForms). All information about all forms, instructions, and pubs is at [IRS.gov/Forms](https://www.irs.gov/Forms).

Almost every form and publication also has a page on IRS.gov with a friendly shortcut. For example, the Form 1040 page is at [IRS.gov/Form1040](https://www.irs.gov/Form1040); the Pub. 501 page is at [IRS.gov/Pub501](https://www.irs.gov/Pub501); the Form W-4 page is at [IRS.gov/W4](https://www.irs.gov/W4); and the Schedule A (Form 1040) page is at [IRS.gov/ScheduleA](https://www.irs.gov/ScheduleA). If typing in a link above instead of clicking on it, be sure to type the link into the address bar of your browser, not a Search box.

If you wish, you can submit comments about draft or final forms, instructions, or publications at [IRS.gov/FormsComments](https://www.irs.gov/FormsComments). We cannot respond to all comments due to the high volume we receive. Please note that we may not be able to consider many suggestions until the subsequent revision of the product.

Form **5471**

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

OMB No. 1545-0123

(Rev. December 2019)

► Go to [www.irs.gov/Form5471](http://www.irs.gov/Form5471) for instructions and the latest information.

Department of the Treasury  
Internal Revenue Service

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

Attachment  
Sequence No. **121**

Name of person filing this return	<b>A Identifying number</b>
Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address)	<b>B Category of filer</b> (See instructions. Check applicable box(es): 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/>
City or town, state, and ZIP code	<b>C</b> Enter the total percentage of the foreign corporation's voting stock you owned at the end of its annual accounting period %

Filer's tax year beginning , 20 , and ending , 20

**D** Check box if this is a final Form 5471 for the foreign corporation

**E** Check if any excepted specified foreign financial assets are reported on this form (see instructions)

**F** Person(s) on whose behalf this information return is filed:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director

**Important:** Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

<b>1a</b> Name and address of foreign corporation	<b>b(1)</b> Employer identification number, if any			
	<b>b(2)</b> Reference ID number (see instructions)			
	<b>c</b> Country under whose laws incorporated			
<b>d</b> Date of incorporation	<b>e</b> Principal place of business	<b>f</b> Principal business activity code number	<b>g</b> Principal business activity	<b>h</b> Functional currency

**2** Provide the following information for the foreign corporation's accounting period stated above.

<b>a</b> Name, address, and identifying number of branch office or agent (if any) in the United States	<b>b</b> If a U.S. income tax return was filed, enter:	
	(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)
<b>c</b> Name and address of foreign corporation's statutory or resident agent in country of incorporation	<b>d</b> 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	

## Schedule A Stock of the Foreign Corporation

(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period



**Schedule C Income Statement** (see instructions)

**Important:** Report all information in functional currency in accordance with U.S. 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 DASTM corporations.

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

**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.

<b>Assets</b>		(a) Beginning of annual accounting period	(b) End of annual accounting period
<b>1</b>	Cash . . . . .	<b>1</b>	
<b>2a</b>	Trade notes and accounts receivable . . . . .	<b>2a</b>	
<b>b</b>	Less allowance for bad debts . . . . .	<b>2b</b> (	)(
<b>3</b>	Derivatives . . . . .	<b>3</b>	
<b>4</b>	Inventories . . . . .	<b>4</b>	
<b>5</b>	Other current assets (attach statement) . . . . .	<b>5</b>	
<b>6</b>	Loans to shareholders and other related persons . . . . .	<b>6</b>	
<b>7</b>	Investment in subsidiaries (attach statement) . . . . .	<b>7</b>	
<b>8</b>	Other investments (attach statement) . . . . .	<b>8</b>	
<b>9a</b>	Buildings and other depreciable assets . . . . .	<b>9a</b>	
<b>b</b>	Less accumulated depreciation . . . . .	<b>9b</b> (	)(
<b>10a</b>	Depletable assets . . . . .	<b>10a</b>	
<b>b</b>	Less accumulated depletion . . . . .	<b>10b</b> (	)(
<b>11</b>	Land (net of any amortization) . . . . .	<b>11</b>	
<b>12</b>	Intangible assets:		
<b>a</b>	Goodwill . . . . .	<b>12a</b>	
<b>b</b>	Organization costs . . . . .	<b>12b</b>	
<b>c</b>	Patents, trademarks, and other intangible assets . . . . .	<b>12c</b>	
<b>d</b>	Less accumulated amortization for lines 12a, 12b, and 12c . . . . .	<b>12d</b> (	)(
<b>13</b>	Other assets (attach statement) . . . . .	<b>13</b>	
<b>14</b>	<b>Total assets</b> . . . . .	<b>14</b>	
<b>Liabilities and Shareholders' Equity</b>			
<b>15</b>	Accounts payable . . . . .	<b>15</b>	
<b>16</b>	Other current liabilities (attach statement) . . . . .	<b>16</b>	
<b>17</b>	Derivatives . . . . .	<b>17</b>	
<b>18</b>	Loans from shareholders and other related persons . . . . .	<b>18</b>	
<b>19</b>	Other liabilities (attach statement) . . . . .	<b>19</b>	
<b>20</b>	Capital stock:		
<b>a</b>	Preferred stock . . . . .	<b>20a</b>	
<b>b</b>	Common stock . . . . .	<b>20b</b>	
<b>21</b>	Paid-in or capital surplus (attach reconciliation) . . . . .	<b>21</b>	
<b>22</b>	Retained earnings . . . . .	<b>22</b>	
<b>23</b>	Less cost of treasury stock . . . . .	<b>23</b> (	)(
<b>24</b>	<b>Total liabilities and shareholders' equity</b> . . . . .	<b>24</b>	

**Schedule G Other Information**

		Yes	No
<b>1</b>	During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign partnership? . . . . . If "Yes," see the instructions for required statement.		
<b>2</b>	During the tax year, did the foreign corporation own an interest in any trust? . . . . .		
<b>3</b>	During the tax year, did the foreign corporation own any foreign entities that were disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)? . . . . . If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		
<b>4a</b>	During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)? . . . . . If "Yes," complete lines 4b and 4c.		
<b>b</b>	Enter the total amount of the base erosion payments . . . . . ▶ \$ _____		
<b>c</b>	Enter the total amount of the base erosion tax benefit . . . . . ▶ \$ _____		
<b>5a</b>	During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? . . . . . If "Yes," complete line 5b.		
<b>b</b>	Enter the total amount of the disallowed deductions (see instructions) . . . . . ▶ \$ _____		

**Schedule G Other Information** (continued)

	Yes	No
<b>6a</b> Is the filer of this Form 5471 claiming a foreign-derived intangible income deduction (under section 250) with respect to any amounts listed on Schedule M? . . . . . If "Yes," complete lines 6b, 6c, and 6d.		
<b>b</b> Enter the amount of gross income derived from sales, leases, exchanges, or other dispositions (but not licenses) from transactions with the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) (see instructions) . . . . . ▶ \$ _____		
<b>c</b> Enter the amount of gross income derived from a license of property to the foreign corporation that the filer included in its computation of FDDEI (see instructions) . . . . . ▶ \$ _____		
<b>d</b> Enter the amount of gross income derived from services provided to the foreign corporation that the filer included in its computation of FDDEI (see instructions) . . . . . ▶ \$ _____		
<b>7</b> During the tax year, was the foreign corporation a participant in any cost sharing arrangement? . . . . .		
<b>8</b> During the course of the tax year, did the foreign corporation become a participant in any cost sharing arrangement? . . . . .		
<b>9</b> If the answer to question 7 is "Yes," was the foreign corporation a participant in a cost sharing arrangement that was in effect before January 5, 2009? . . . . .		
<b>10</b> If the answer to question 7 is "Yes," did a U.S. taxpayer make any platform contributions as defined under Regulations section 1.482-7(c) to that cost sharing arrangement during the taxable year? . . . . .		
<b>11</b> If the answer to question 10 is "Yes," enter the present value of the platform contributions in U.S. dollars . . . . . ▶ \$ _____		
<b>12</b> If the answer to question 10 is "Yes," check the box for the method under Regulations section 1.482-7(g) used to determine the price of the platform contribution transaction(s): <input type="checkbox"/> Comparable uncontrolled transaction method <input type="checkbox"/> Income method <input type="checkbox"/> Acquisition price method <input type="checkbox"/> Market capitalization method <input type="checkbox"/> Residual profit split method <input type="checkbox"/> Unspecified methods		
<b>13</b> 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))? . . . . .		
<b>14a</b> 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 taxable year? . . . . . If "Yes," go to line 14b.		
<b>b</b> Enter the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for the taxable year . . . . . ▶ \$ _____		
<b>15</b> 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.		
<b>16</b> 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).		
<b>17</b> During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)? . . . . .		
<b>18</b> 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? . . . . .		
<b>19</b> Did you answer "Yes" to any of the questions in the instructions for line 19? . . . . . If "Yes," enter the corresponding code(s) from the instructions and attach statement (see instructions) ▶ _____		
<b>20</b> Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)? . . . . . If "Yes," enter the amount . . . . . ▶ \$ _____		
<b>21</b> 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 . . . . . ▶ \$ _____		

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

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

Name of U.S. shareholder ▶	Identifying number ▶		
<b>1a</b> Section 964(e)(4) Subpart F dividend income from the sale of stock of a lower-tier foreign corporation (see instructions)	<b>1a</b>		
<b>b</b> Section 245A(e)(2) Subpart F income from hybrid dividends of tiered corporations (see instructions)	<b>1b</b>		
<b>c</b> Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A)	<b>1c</b>		
<b>d</b> Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	<b>1d</b>		
<b>e</b> Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A)	<b>1e</b>		
<b>f</b> Other subpart F income (see instructions)	<b>1f</b>		
<b>2</b> Earnings invested in U.S. property (enter the result from Worksheet B in the instructions)	<b>2</b>		
<b>3</b> Section 245A eligible dividends (see instructions)	<b>3</b>		
<b>4</b> Factoring income See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.	<b>4</b>		
<b>5</b> Dividends received (translated at spot rate on payment date under section 989(b)(1))	<b>5</b>		
<b>6</b> Exchange gain or (loss) on a distribution of previously taxed earnings and profits	<b>6</b>		

	Yes	No
• Was any income of the foreign corporation blocked?		
• Did any such income become unblocked during the tax year (see section 964(b))?		

If the answer to either question is "Yes," attach an explanation.