

# Instructions for Form 5471

(Rev. February 2020)



Department of the Treasury  
Internal Revenue Service

(Use with the December 2019 revision of Form 5471 and separate Schedules E, I-1, J, and P, the December 2018 revision of separate Schedules H and M, and the December 2012 revision of separate Schedule O.)

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

Section references are to the Internal Revenue Code unless otherwise noted.

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### Future Developments

For the latest information about developments related to Form 5471, its schedules, and its instructions, such as legislation enacted after they were published, go to [IRS.gov/Form5471](https://www.irs.gov/Form5471).

### What's New

**Changes to Form 5471.** On page 5 of Form 5471, new questions 20 and 21 have been added to Schedule G to reflect P.L. 115-97, section 13301, which added section 163(j) to the Code.

On page 6 of Form 5471, old line 1c has been deleted from Schedule I, and new lines 1c through 1f have been inserted in its place. These new lines request various types of subpart F income of the CFC. Also, line 3 has been reworded. The old line 3 language has been deleted to reflect P.L. 115-97, section 14212(b)(5), which struck section 970(b) from the Code. The new line 3 language requests section 245A eligible dividends. This new line 3 language was added to reflect P. L. 115-97, section 14101, which added section 245A.

**Changes to separate Schedule E (Form 5471).** On page 1, the column heading for Schedule E, Part I, column (g), has been reworded for purposes of clarity.

On pages 2 and 3, seven new columns have been added to Schedule E-1 (columns (e)(v) through (e)(viii) and columns (e)(xiii) through (e)(xv)) and most of the preexisting columns of Schedule E-1 have been rearranged to reflect Notice 2019-01, 2019-2 I.R.B. 275, available at [IRS.gov/irb/2019-02\\_IRB#NOT-2019-01](https://www.irs.gov/irb/2019-02_IRB#NOT-2019-01).

**Note.** Regulations section 1.960-3(c)(2) includes only ten of the sixteen PTEP groups listed in Notice 2019-01. Taxpayers should still complete each column of the Schedule E-1.

**Changes to separate Schedule H (Form 5471).** No changes have been made to Schedule H (Form 5471). Use the December 2018 revision.

**Changes to separate Schedule I-1 (Form 5471).** Line 9 was revised and line 10 was added to conform Schedule I-1 to the final regulations under section 951A. Line 9 (interest expense) was renumbered as line 9a, and lines 9b through 9d were added to report qualified interest expense, tested loss QBAI amount, and tested interest expense. Lines 10a through 10c were added to report interest income, qualified interest income, and tested interest income. Schedule I-1 is now completed once. (It is no longer completed separately for each applicable category of income.) Therefore, Schedule I-1 is completed once (for general category income, passive

category income, or both). A Schedule I-1 that includes passive category income must include the code for passive category income (PAS) in the entry space for separate category (at the top of Schedule I-1). A taxpayer with only general category income (and no passive category income) should enter the code "GEN" in the entry space for separate category.

**Changes to separate Schedule J (Form 5471).** In Part I, column (e), seven new columns have been added (columns (e)(v) through (e)(viii) and columns (e)(xiii) through (e)(xv)) and most of the preexisting columns have been rearranged to reflect [Notice 2019-01](#).

**Note.** Regulations section 1.960-3(c)(2) includes only ten of the sixteen PTEP groups listed in Notice 2019-01. Taxpayers should still complete each column of the Schedule J.

**Changes to separate Schedule M (Form 5471).** No changes have been made to Schedule M (Form 5471). Use the December 2018 revision.

**Changes to separate Schedule O (Form 5471).** No changes have been made to Schedule O (Form 5471). Use the December 2012 revision.

**Changes to separate Schedule P (Form 5471).** Part II is new. It is identical to Part I except that previously taxed E&P must now be reported in functional currency (Part I) and U.S. dollars (Part II).

Seven new columns have been added to Part I and Part II (columns (e) through (h) and columns (n) through (o)) and most of the preexisting columns have been rearranged to reflect [Notice 2019-01](#).

**Note.** Regulations section 1.960-3(c)(2) includes only ten of the sixteen PTEP groups listed in Notice 2019-01. Taxpayers should still complete each column of the Schedule P.

**Changes to Instructions for Form 5471 and separate schedules.** The instructions have been updated for each of the aforementioned changes to Form 5471 and separate schedules. In addition:

- Changes have been made throughout these instructions to reflect Rev. Proc. 2019-40, 2019-43 I.R.B. 982, available at [IRS.gov/irb/2019-43\\_IRB#REV-PROC-2019-40](https://www.irs.gov/irb/2019-43_IRB#REV-PROC-2019-40) which generally provides relief to U.S. persons that directly, indirectly, or constructively own stock in foreign corporations that are CFCs as a result of the repeal of section 958(b)(4).
- Changes have been made throughout these instructions based on final regulations under section 960 (T. D. 9882, 84 FR 69022, December 17, 2019).
- In the Instructions for Schedule I, several lines have been added to Worksheet A to assist shareholders in determining their pro rata share of the components of subpart F income specified on new lines 1c through 1f of Form 5471, Schedule I.
- In the instructions for Schedule I, Worksheet C (U.S. Shareholder's Pro Rata Share of Previously Excluded Export Trade Income of a CFC Withdrawn From Investment in Export Trade Assets) has been deleted to reflect P.L. 115-97, section 14212(b)(5), which struck section 970(b) of the Code.

## Reminders

**2017 Tax Reform.** On December 22, 2017, Congress enacted the "Tax Cuts and Jobs Act," P. L. 115-97, which made significant changes to U.S. international tax rules. For a description of such changes, including corresponding changes to Form 5471 and separate schedules, please see the [December 2018 Instructions for Form 5471](#). Please note that some of the changes to Form 5471 and separate schedules noted in the December 2018 instructions for Form 5471 have been modified by the *What's New* items listed previously in these December 2019 instructions.

## General Instructions

### Purpose of Form

Form 5471 is used by certain U.S. persons who are officers, directors, or shareholders in certain foreign corporations. The form and schedules are used to satisfy the reporting requirements of sections 6038 and 6046, and the related regulations, as well as to report amounts related to section 965.

### Who Must File

Generally, all U.S. persons described in *Categories of Filers* below must complete the schedules, statements, and/or other information requested in the chart, *Filing Requirements for Categories of Filers*, later. Read the information for each category carefully to determine which schedules, statements, and/or information apply.

If the filer is described in more than one filing category, do not duplicate information. However, complete all items that apply. For example, if you are the sole owner of a CFC (i.e., you are described in Categories 4 and 5), complete all six pages of Form 5471 and separate Schedules E, H, I-1, J, M, and P.

**Note.** Complete a **separate** Form 5471 and all applicable schedules for **each** applicable foreign corporation.

### When and Where To File

Attach Form 5471 to your income tax return (or, if applicable, partnership or exempt organization return) and file both by the due date (including extensions) for that return.

## Categories of Filers

### Category 1 Filer

This category includes a U.S. shareholder of a foreign corporation that is a section 965 specified foreign corporation (defined below) at any time during any tax year of the foreign corporation, and who owned that stock on the last day in that year on which it was an SFC, taking into account the regulations under section 965. However, see [Certain Category 1 and Category 5 Filers](#), later, which may apply.

**U.S. shareholder.** For purposes of Category 1, a U.S. shareholder is a U.S. person who owns (directly, indirectly, or constructively, within the meaning of sections 958(a) and (b)) 10% or more of the total combined voting power of all classes of voting stock of an SFC or, in the case of a tax year of a foreign corporation beginning after December 31, 2017, 10% or more of the total combined voting power or value of shares of all classes of stock of an SFC.

**U.S. person.** See [Category 5 Filer](#), later, for definition.

**Section 965 specified foreign corporation (SFC).** For purposes of Category 1, an SFC (as defined in section 965) is:

1. A CFC (see [Category 5 Filer](#), later, for a definition), or
2. Any foreign corporation with respect to which one or more domestic corporations is a U.S. shareholder.

However, if a passive foreign investment company (as defined in section 1297) with respect to the shareholder is not a CFC, then such corporation is not an SFC.

See section 965 and the regulations thereunder for exceptions.

**Note.** A U.S. shareholder who is a Category 1 filer (defined above) must

continue to file all information required of a Category 1 filer as long as:

- The section 965 specified foreign corporation has accumulated E&P related to section 965 that is reportable on Schedule J (Form 5471), or
- The U.S. shareholder has previously taxed E&P related to section 965 that is reportable on Schedule P (Form 965).

### Category 2 Filer

This category includes a U.S. citizen or resident who is an officer or director of a foreign corporation in which a U.S. person (defined below) has acquired (in one or more transactions):

1. Stock which meets the 10% stock ownership requirement (described below) with respect to the foreign corporation, or
2. An additional 10% or more (in value or voting power) of the outstanding stock of the foreign corporation.

A U.S. person has **acquired** stock in a foreign corporation when that person has an unqualified right to receive the stock, even though the stock is not actually issued. See Regulations section 1.6046-1(f)(1) for more details.

**10% stock ownership requirement.** For purposes of Category 2 and Category 3, the stock ownership threshold is met if a U.S. person owns:

1. 10% or more of the total value of the foreign corporation's stock, or
2. 10% or more of the total combined voting power of all classes of stock with voting rights.

**U.S. person.** For purposes of Category 2 and Category 3, a U.S. person is:

1. A citizen or resident of the United States,
2. A domestic partnership,
3. A domestic corporation, and
4. An estate or trust that is not a foreign estate or trust as defined in section 7701(a)(31).

See Regulations section 1.6046-1(f)(3) for exceptions.

### Category 3 Filer

This category includes:

- A U.S. person (see [Category 2 Filer](#), above, for definition) who acquires stock in a foreign corporation which, when added to any stock owned on the date of acquisition, meets the 10% stock ownership requirement (described above) with respect to the foreign corporation;
- A U.S. person who acquires stock which, without regard to stock already owned on the date of acquisition, meets the 10% stock ownership requirement with respect to the foreign corporation;

- A person who is treated as a U.S. shareholder under section 953(c) with respect to the foreign corporation;
- A person who becomes a U.S. person while meeting the 10% stock ownership requirement with respect to the foreign corporation; or
- A U.S. person who disposes of sufficient stock in the foreign corporation to reduce his or her interest to less than the 10% stock ownership requirement.

For more information, see section 6046 and Regulations section 1.6046-1.

### Category 4 Filer

This category includes a U.S. person who had control (defined below) of a foreign corporation during the annual accounting period of the foreign corporation.

**U.S. person.** For purposes of Category 4, a U.S. person is:

1. A citizen or resident of the United States;
2. A nonresident alien for whom an election is in effect under section 6013(g) to be treated as a resident of the United States;
3. An individual for whom an election is in effect under section 6013(h), relating to nonresident aliens who become residents of the United States during the tax year and are married at the close of the tax year to a citizen or resident of the United States;
4. A domestic partnership;
5. A domestic corporation; and
6. An estate or trust that is not a foreign estate or trust as defined in section 7701(a)(31).

See Regulations section 1.6038-2(d) for exceptions.

**Control.** A U.S. person has control of a foreign corporation if, at any time during that person's tax year, it owns stock possessing:

1. More than 50% of the total combined voting power of all classes of stock of the foreign corporation entitled to vote, or
2. More than 50% of the total value of shares of all classes of stock of the foreign corporation.

A person in control of a corporation that, in turn, owns more than 50% of the combined voting power, or the value, of all classes of stock of another corporation is also treated as being in control of such other corporation.

**Example.** Corporation A owns 51% of the voting stock in Corporation B. Corporation B owns 51% of the voting stock in Corporation C. Corporation C owns 51% of the voting stock in

Corporation D. Therefore, Corporation D is controlled by Corporation A.

For more details on "control," see Regulations sections 1.6038-2(b) and (c).

### Category 5 Filer

This category includes a U.S. shareholder who owns stock in a foreign corporation that is a CFC at any time during any tax year of the foreign corporation, and who owned that stock on the last day in that year on which it was a CFC. However, see [Certain Category 1 and Category 5 Filers](#), later, which may apply.

**U.S. shareholder.** For purposes of Category 5, a U.S. shareholder is a U.S. person who:

1. Owns (directly, indirectly, or constructively, within the meaning of sections 958(a) and (b)) 10% or more of the total combined voting power of all classes of voting stock of a CFC or, in the case of a tax year of a foreign corporation beginning after December 31, 2017, 10% or more of the total combined voting power or value of shares of all classes of stock of a CFC; or
2. Owns (either directly or indirectly, within the meaning of section 958(a)) any stock of a CFC (as defined in sections 953(c)(1)(B) and 957(b)) that also is a captive insurance company.

**U.S. person.** For purposes of Category 5, a U.S. person is:

1. A citizen or resident of the United States,
2. A domestic partnership,
3. A domestic corporation, and
4. An estate or trust that is not a foreign estate or trust as defined in section 7701(a)(31).

See section 957(c) for exceptions.

**CFC.** A CFC is a foreign corporation that has U.S. shareholders that own (directly, indirectly, or constructively, within the meaning of sections 958(a) and (b)) on any day of the tax year of the foreign corporation, more than 50% of:

1. The total combined voting power of all classes of its voting stock, or
2. The total value of the stock of the corporation.

### Certain Category 1 and Category 5 Filers

Rev. Proc. 2019-40 provides relief for certain types of Category 5 filers. These instructions clarify that this relief is extended to similarly-situated Category 1 filers.

**Unrelated section 958(a) U.S. shareholder.** For purposes of Category 1 and Category 5, an unrelated section 958(a)

U.S. shareholder is a U.S. shareholder with respect to a foreign-controlled corporation who:

1. Owns, within the meaning of section 958(a), stock of a foreign-controlled corporation; and
2. Is not related (using principles of section 954(d)(3)) to the foreign-controlled corporation.

### Related constructive U.S. shareholder.

For purposes of Category 1 and Category 5, a related constructive U.S. shareholder is a U.S. shareholder with respect to a foreign-controlled corporation who:

1. Does not own, within the meaning of section 958(a), stock of the foreign-controlled corporation; and
2. Is related (using principles of section 954(d)(3)) to the foreign-controlled corporation.

**Foreign-controlled corporation.** For purposes of Category 1 and Category 5, a foreign-controlled corporation is a foreign corporation that is a CFC or SFC that would not be a CFC or SFC, if the determination were made without applying subparagraphs (A), (B), and (C) of section 318(a)(3) so as to consider a U.S. person as owning stock which is owned by a foreign person.

### Exceptions From Filing

#### Multiple filers of same information.

One person may file Form 5471 and the applicable schedules for other persons who have the same filing requirements. If you and one or more other persons are required to furnish information for the same foreign corporation for the same period, a joint information return that contains the required information may be filed with your tax return or with the tax return of any one of the other persons. For example, a U.S. person described in Category 5 may file a joint Form 5471 with a Category 4 or another Category 5 filer. However, for Category 3 filers, the required information may only be filed by another person having an equal or greater interest (measured in terms of value or voting power of the stock of the foreign corporation).

The person that files Form 5471 must complete Form 5471 in the manner described in the instructions for Item F. All persons identified in Item F must attach a statement to their income tax return that includes the information described in the instructions for Item F.

**Domestic corporations.** Shareholders are not required to file the information checked in the chart, later, for a foreign insurance company that has elected (under section 953(d)) to be treated as a domestic corporation and has filed a U.S. income tax return for its tax year under

that provision. See Rev. Proc. 2003-47, 2003-28 I.R.B. 55, available at [IRS.gov/irb/2003-28\\_IRB#RP-2003-47](https://www.irs.gov/irb/2003-28_IRB#RP-2003-47) for procedural rules regarding the election under section 953(d).

**Constructive owners.**

- A U.S. person described in Category 1, 3, 4, or 5 (“shareholder”) does not have to file Form 5471 if **all** of the following conditions are met.

1. The shareholder does not own a direct interest in the foreign corporation;
2. The shareholder is required to furnish the information requested solely because of constructive ownership (as determined under Regulations section 1.958-2, 1.6038-2(c), or 1.6046-1(i)) from another U.S. person; and
3. The U.S. person through which the shareholder constructively owns an interest in the foreign corporation files Form 5471 to report all of the required information.

No statement is required to be attached to tax returns for persons claiming the constructive ownership exception.

- A Category 2 filer does not have to file Form 5471 if:

1. Immediately after a reportable stock acquisition, three or fewer U.S. persons own 95% or more in value of the outstanding stock of the foreign corporation and the U.S. person making the acquisition files a return for the acquisition as a Category 3 filer, **or**

2. The U.S. person(s) for which the Category 2 filer is required to file Form 5471 does not directly own an interest in the foreign corporation but is required to furnish the information solely because of constructive stock ownership from a U.S. person and the person from whom the stock ownership is attributed furnishes all of the required information.

- A Category 1, 4 or 5 filer does not have to file Form 5471 if the shareholder:

1. Does not own a direct or indirect interest in the foreign corporation, and
2. Is required to file Form 5471 solely because of constructive ownership from a nonresident alien.

- A Category 1 or 5 filer does not have to file Form 5471 if no U.S. shareholder (including such U.S. person) owns, within the meaning of section 958(a), stock in the foreign corporation on the last day in the year of the foreign corporation in which it was an SFC or CFC, and the foreign corporation is an SFC or CFC solely because one or more U.S. persons is considered to own the stock of the foreign corporation owned by a foreign person under section 318(a)(3). Furthermore, a Category 1 or 5 filer does not have to file Form 5471 if all of the following conditions are met.

1. The filer is a U.S. shareholder that owns stock, within the meaning of section 958(b), in the foreign corporation;

2. The filer is not related, using principles of section 954(d)(3), to the foreign corporation; and

3. The foreign corporation is a foreign-controlled CFC . See Rev. Proc. 2019-40 for more details.

**Additional Filing Requirements**

**Category 3 filers.** Category 3 filers must attach a statement that includes:

1. The amount and type of any indebtedness the foreign corporation has

with the related persons described in Regulations section 1.6046-1(b)(11); and

2. The name, address, identifying number, and number of shares subscribed to by each subscriber to the foreign corporation's stock.

**Foreign sales corporations (FSCs).**

- Category 2 and Category 3 filers who are shareholders, officers, and directors of a FSC (as defined in section 922, as in effect before its repeal) must file Form 5471 and a separate Schedule O to report changes in the ownership of the FSC.

- Category 4 and 5 filers are not subject to the subpart F rules for:

1. Exempt foreign trade income;

**Filing Requirements for Categories of Filers**

**Table of Required Information**

Required Information*	Category of Filer						
	1 <sub>1</sub>	2	3	4	5 <sub>1</sub>	Unrelated section 958(a) U.S. Shareholder	Related Constructive U.S. Shareholder
The identifying information on page 1 of Form 5471 above Schedule A, see <b>Specific Instructions</b>	✓	✓	✓	✓	✓	✓	✓
Schedule A			✓	✓			
Schedule B, Part I			✓	✓			
Schedule B, Part II	✓		✓	✓	✓		✓
Schedules C and F			✓	✓			
Separate Schedule E	✓			✓	✓	✓ <sub>2</sub>	✓ <sub>3</sub>
Schedule E-1 (included with separate Schedule E)	✓			✓	✓	✓ <sub>2</sub>	
Schedule G			✓	✓	✓		✓
Separate Schedule H				✓	✓		
Schedule I				✓	✓	✓	
Separate Schedule I-1				✓	✓	✓	✓
Separate Schedule J	✓			✓	✓		
Separate Schedule M				✓			
Separate Schedule O, Part I		✓					
Separate Schedule O, Part II			✓				
Separate Schedule P	✓			✓	✓	✓	

\*See also [Additional Filing Requirements](#) on this page.

1. Certain Category 1 and Category 5 filers may meet the requirements to file under the last two columns of this chart. See [Certain Category 1 and Category 5 Filers](#).

2. Schedules E and E-1 are required for an unrelated section 958(a) U.S. Shareholder only if the filer claims deemed paid foreign income taxes of the foreign-controlled corporation under section 960 for the filer's taxable year. See Rev. Proc. 2019-40 for more details.

3. Related constructive U.S. shareholders only need to complete Schedule E (they can leave Schedule E-1 blank). See Rev. Proc. 2019-40 for more details.

2. Deductions that are apportioned or allocated to exempt foreign trade income;

3. Nonexempt foreign trade income (other than section 923(a)(2) nonexempt income, within the meaning of section 927(d)(6), as in effect before its repeal); and

4. Any deductions that are apportioned or allocated to the nonexempt foreign trade income described above.

• Category 4 and 5 filers are subject to the subpart F rules for:

1. All other types of FSC income (including section 923(a)(2) nonexempt income within the meaning of section 927(d)(6), as in effect before its repeal);

2. Investment income and carrying charges (as defined in sections 927(c) and 927(d)(1), as in effect before their repeal); and

3. All other FSC income that is not foreign trade income or investment income or carrying charges.

• Category 4 and 5 filers are not required to file a Form 5471 (in order to satisfy the requirements of section 6038) if the FSC has filed a Form 1120-FSC. See Temporary Regulations section 1.921-1T(b)(3). However, these filers may be required to file Form 5471 if they are subject to the subpart F rules with respect to certain types of FSC income (see above).

**Section 338 election.** If a section 338 election is made with respect to a qualified stock purchase of a foreign target corporation for which a Form 5471 must be filed:

• A purchaser (or its U.S. shareholder) must attach a copy of Form 8883, Asset Allocation Statement Under Section 338, to the first Form 5471 for the new foreign target corporation (see the Instructions for Form 8883 for details);

• A seller (or its U.S. shareholder) must attach a copy of Form 8883 to the last Form 5471 for the old foreign target corporation.

**Reportable transaction disclosure statement.** If a U.S. shareholder of a CFC is considered to have participated in a reportable transaction under the rules of Regulations section 1.6011-4(c)(3)(i)(G), the shareholder is required to disclose information for each reportable transaction. Form 8886, Reportable Transaction Disclosure Statement, must be filed for each tax year indicated in Regulations section 1.6011-4(c)(3)(i)(G). The following are reportable transactions.

1. Any listed transaction, which is a transaction that is the same as or substantially similar to one of the types of transactions that the IRS has determined to be a tax avoidance transaction and identified by notice, regulation, or other

published guidance as a listed transaction.

2. Any transaction offered under conditions of confidentiality for which the corporation (or a related party) paid an advisor a fee of at least \$250,000.

3. Certain transactions for which the corporation (or a related party) has contractual protection against disallowance of the tax benefits.

4. Certain transactions resulting in a loss of at least \$10 million in any single year or \$20 million in any combination of years.

5. Any transaction identified by the IRS by notice, regulation, or other published guidance as a “transaction of interest.” See Notice 2009-55, 2009-31 I.R.B. 170, available at [IRS.gov/irb/2009-31\\_IRB#NOT-2009-55](https://www.irs.gov/irb/2009-31_IRB#NOT-2009-55).

For more information, see Regulations section 1.6011-4. Also see the Instructions for Form 8886.

**Penalties.** The U.S. shareholder may have to pay a penalty if it is required to disclose a reportable transaction under section 6011 and fails to properly complete and file Form 8886. Penalties also may apply under section 6707A if the U.S. shareholder fails to file Form 8886 with its income tax return, fails to provide a copy of Form 8886 to the Office of Tax Shelter Analysis (OTSA), or files a form that fails to include all the information required (or includes incorrect information). Other penalties, such as an accuracy-related penalty under section 6662A, also may apply. See the Instructions for Form 8886 for details on these and other penalties.

**Reportable transactions by material advisors.** Material advisors to any reportable transaction must disclose certain information about the reportable transaction by filing Form 8918, Material Advisor Disclosure Statement, with the IRS. For details, see the Instructions for Form 8918.

**Reporting other foreign financial assets.** If you have other foreign financial assets, you may be required to file Form 8938, Statement of Specified Foreign Financial Assets. However, you are not required to report any items otherwise reported on Form 5471 on that form. See the Instructions for Form 8938 for more information.

## Penalties

**Failure to file information required by section 6038(a) (Form 5471 and Schedule M).**

• A \$10,000 penalty is imposed for each annual accounting period of each foreign corporation for failure to furnish the information required by section 6038(a)

within the time prescribed. If the information is not filed within 90 days after the IRS has mailed a notice of the failure to the U.S. person, an additional \$10,000 penalty (per foreign corporation) is charged for each 30-day period, or fraction thereof, during which the failure continues after the 90-day period has expired. The additional penalty is limited to a maximum of \$50,000 for each failure.

• Any person who fails to file or report all of the information required within the time prescribed will be subject to a reduction of 10% of the foreign taxes available for credit under sections 901, 902 (with respect to foreign corporate tax years beginning before January 1, 2018), and 960. If the failure continues 90 days or more after the date the IRS mails notice of the failure to the U.S. person, an additional 5% reduction is made for each 3-month period, or fraction thereof, during which the failure continues after the 90-day period has expired. See section 6038(c)(2) for limits on the amount of this penalty.

**Failure to file information required by section 6046 and the related regulations (Form 5471 and Schedule O).**

Any person who fails to file or report all of the information requested by section 6046 is subject to a \$10,000 penalty for each such failure for each reportable transaction. If the failure continues for more than 90 days after the date the IRS mails notice of the failure, an additional \$10,000 penalty will apply for each 30-day period or fraction thereof during which the failure continues after the 90-day period has expired. The additional penalty is limited to a maximum of \$50,000.

**Criminal penalties.** Criminal penalties under sections 7203, 7206, and 7207 may apply for failure to file the information required by sections 6038 and 6046.

**Note.** Any person required to file Form 5471 and Schedule J, M, or O who agrees to have another person file the form and schedules for him or her may be subject to the above penalties if the other person does not file a correct and proper form and schedule.

**Section 6662(j).** Penalties may be imposed for undisclosed foreign financial asset understatements. No penalty will be imposed with respect to any portion of an underpayment if the taxpayer can demonstrate that the failure to comply was due to reasonable cause with respect to such portion of the underpayment and the taxpayer acted in good faith with respect to such portion of the underpayment. See sections 6662(j) and 6664(c) for additional information.

**Inapplicability of certain penalties.** Certain penalties under sections 6038 and 6662 may be waived for certain persons

under Rev. Proc. 2019-40. See Section 7 of Rev. Proc. 2019-40 for more details.

## Other Reporting Requirements

**Reporting exchange rates on Form 5471.** When translating amounts from functional currency to U.S. dollars, you must use the method specified in these instructions. For example, when translating amounts to be reported on Schedule E, you generally must use the average exchange rate as defined in section 986(a). But, regardless of the specific method required, all exchange rates must be reported using a "divide-by convention" rounded to at least four places. That is, the exchange rate must be reported in terms of the amount by which the functional currency amount must be divided in order to reflect an equivalent amount of U.S. dollars. As such, the exchange rate must be reported as the units of foreign currency that equal one U.S. dollar, rounded to at least four places. **Do not** report the exchange rate as the number of U.S. dollars that equal one unit of foreign currency.

**Note.** You must round the result to more than four places if failure to do so would materially distort the exchange rate or the equivalent amount of U.S. dollars.

**Example.** During its annual accounting period, the foreign corporation paid income taxes of 30,255,400 Yen to Japan. The Schedule E instructions specify that the foreign corporation must translate these amounts into U.S. dollars at the average exchange rate for the tax year to which the tax relates in accordance with the rules of section 986(a). The average exchange rate is 118.5050 Japanese Yen to one U.S. dollar (0.00843846) U.S. dollars to one Japanese Yen. The foreign corporation divides 30,255,400 Yen by 118.5050 to determine the U.S. dollar amount to enter in column (i) of Schedule E, Part I. Line 1 of Schedule E, Part I is completed in relevant part as follows.

- Enter the name of the foreign corporation in column (a).
- Enter the foreign corporation's EIN or reference ID number in column (b).
- Enter "Japan" in column (c).
- Enter "30,255,400 Yen" in column (g).
- Enter "118.5050" in column (h).
- Enter "255,309" in column (i).

## Computer-Generated Form 5471 and Schedules

Generally, all computer-generated forms must receive prior approval from the IRS and are subject to an annual review. However, see the *Exception* below. Requests for approval may be submitted

electronically to [substituteforms@irs.gov](mailto:substituteforms@irs.gov), or requests may be mailed to:

Internal Revenue Service  
Attention: Substitute Forms Program  
SE:W:CAR:MP:P:TP  
1111 Constitution Ave. NW,  
Room 6554  
Washington, DC 20224

**Exception.** If a computer-generated Form 5471 and its schedules conform to and do not deviate from the official form and schedules, they may be filed without prior approval from the IRS.

**Important.** Be sure to attach the approval letter to Form 5471. However, if the computer-generated form is identical to the IRS prescribed form, it does not need to go through the approval process, and an attachment is not necessary.

Every year, the IRS issues a revenue procedure to provide guidance for filers of computer-generated forms. In addition, every year the IRS issues Pub. 1167, General Rules and Specifications For Substitute Forms and Schedules, which reprints the most recent applicable revenue procedure. Pub. 1167 is available at [IRS.gov/forms-pubs/about-publication-1167](https://www.irs.gov/forms-pubs/about-publication-1167).

## Dormant Foreign Corporations

Rev. Proc. 92-70, 1992-2 C.B. 435, provides a summary filing procedure for filing Form 5471 for a dormant foreign corporation (defined in section 3 of Rev. Proc. 92-70). This summary filing procedure will satisfy the reporting requirements of sections 6038 and 6046.

If you elect the summary procedure, complete only page 1 of Form 5471 for each dormant foreign corporation as follows.

- The top margin of the summary return must be labeled "Filed Pursuant to Rev. Proc. 92-70 for Dormant Foreign Corporation."
- Include filer information such as name and address, Items A through C, and tax year.
- Include corporate information such as the dormant corporation's annual accounting period (below the title of the form) and Items 1a, 1b, 1c, and 1d. For more information, see Rev. Proc. 92-70.

File this summary return in the manner described in *When and Where To File*, earlier.

## Treaty-Based Return Positions

You generally are required to file Form 8833, Treaty-Based Return Position Disclosure Under Section 6114 or 7701(b), to disclose a return position that any treaty of the United States (such as an

income tax treaty, an estate and gift tax treaty, or a friendship, commerce, and navigation treaty):

- Overrides or modifies any provision of the Internal Revenue Code; and
- Causes, or potentially causes, a reduction of any tax incurred at any time.

See Form 8833 for exceptions.

Failure to make a required disclosure may result in a \$1,000 penalty (\$10,000 for a C corporation). See section 6712.

## Section 362(e)(2)(C) Elections

The transferor and transferee in certain section 351 transactions may make a joint election under section 362(e)(2)(C) to limit the transferor's basis in the stock received instead of the transferee's basis in the transferred property. The election is made by a statement as provided in Notice 2005-70, 2005-41 I.R.B. 694, available at [IRS.gov/irb/2005-41\\_IRB#NOT-2005-70](https://www.irs.gov/irb/2005-41_IRB#NOT-2005-70) and regulations under section 362(e)(2).



*Do not attach the statement described above to Form 5471.*

## Section 108(i) Elections

If the controlling domestic shareholder(s) of a CFC made an election in 2009 or 2010 to defer income from cancellation of debt in connection with the CFC's reacquisition of an applicable debt instrument, a statement must be filed (in the manner specified in the *Caution* below) beginning with the tax year following the tax year for which the controlling domestic shareholder of the CFC made the election, and ending the first tax year all income deferred has been included in income. In addition, a copy of the election statement it filed to make the election to defer income must be filed annually (also in the manner specified in the *Caution* below). For details, see section 108(i) and Rev. Proc. 2009-37, 2009-36 I.R.B. 309, available at [IRS.gov/irb/2009-36\\_IRB#RP-2009-37](https://www.irs.gov/irb/2009-36_IRB#RP-2009-37).



*Do not attach the statements described above to Form 5471. Instead, if the foreign corporation is required to file a U.S. income tax return (for example, Form 1120-F), attach the statements to that return.*

## Corrections to Form 5471

If you file a Form 5471 that you later determine is incomplete or incorrect, file a corrected Form 5471 with an amended tax return, using the amended return instructions for the return with which you originally filed Form 5471. Write "Corrected" at the top of the form and attach a statement identifying the changes.

## Specific Instructions

**Important.** If the information required in a given section exceeds the space provided within that section, **do not** write “See attached” in the section and then attach all of the information on additional sheets. Instead, complete all entry spaces in the section and attach the remaining information on additional sheets. The additional sheets must conform with the IRS version of that section.

## Identifying Information

### Annual Accounting Period

Enter, in the space provided below the title of Form 5471, the annual accounting period of the foreign corporation for which you are furnishing information. Except for information contained on Schedule O, report information for the tax year of the foreign corporation that ends with or within your tax year. When filing Schedule O, report acquisitions, dispositions, and organizations or reorganizations that occurred during your tax year.

**Section 898 specified foreign corporation (SFC).** The annual accounting period of an SFC (as defined in section 898) generally is required to be the tax year of the corporation's majority U.S. shareholder. If there is more than one majority shareholder, the required tax year will be the tax year that results in the least aggregate deferral of income to all U.S. shareholders of the foreign corporation.

For these purposes, section 898(b) defines an SFC as any foreign corporation:

1. That is treated as a CFC under subpart F, and
2. In which more than 50% of the total voting power or value of all classes of stock of the corporation is treated as owned by a U.S. shareholder.

For more information, see section 898 and Rev. Proc. 2002-37, 2002-22 I.R.B. 1030, available at [IRS.gov/pub/irs-irbs/irb02-22.pdf](https://www.irs.gov/pub/irs-irbs/irb02-22.pdf) and Rev. Proc. 2002-39, 2002-22 I.R.B. 1046, available at [IRS.gov/pub/irs-irbs/irb02-22.pdf](https://www.irs.gov/pub/irs-irbs/irb02-22.pdf) as modified by Notice 2002-72, 2002-46 I.R.B. 843, available at [IRS.gov/pub/irs-irbs/irb02-46.pdf](https://www.irs.gov/pub/irs-irbs/irb02-46.pdf).

### Name of Person Filing this Return

The name of the person filing Form 5471 is generally the name of the U.S. person described in the applicable category or categories of filers (see [Categories of Filers](#), earlier). However, in the case of a consolidated return, enter the name of the U.S. parent in the field for “Name of person filing this return.” Be sure to list

each U.S. shareholder of the foreign corporation in Schedule B, Part I.

**Name change.** If the name of either the person filing the return or the corporation whose activities are being reported changed within the past 3 years, show the prior name(s) in parentheses after the current name.

### Address

Include the suite, room, or other unit number after the street address. If the post office does not deliver mail to the street address and the U.S. person has a P.O. box, show the box number instead.

**Foreign address.** Enter the information in the following order: city, province or state, and country. Follow the country's practice for entering the postal code, if any. Do not abbreviate the country name.

### Item A—Identifying Number

The identifying number of an individual is his or her social security number (SSN). The identifying number of all others is their employer identification number (EIN). If a U.S. corporation that owns stock in a foreign corporation is a member of a consolidated group, list the common parent as the person filing the return and enter its EIN in Item A.

### Item B—Category of Filer

Complete Item B to indicate the category or categories that describe the person filing this return. If more than one category applies, check all boxes that apply.

### Item C—Percentage of Voting Stock Owned

Enter the total percentage of the foreign corporation's voting stock you owned directly, indirectly, or constructively at the end of the corporation's annual accounting period.

### Item D—Final Year

Check the Item D checkbox only if this is the final year of the foreign corporation's existence as a corporation for federal tax purposes. For instance, if a reorganization has occurred, a complete liquidation has occurred, or an election to treat the foreign corporation as a disregarded entity has been made. If this Item D is checked, complete Schedule O.

### Item E—Excepted Specified Foreign Financial Assets

Check the Item E checkbox if any excepted specified foreign financial assets are reported on Form 5471. If this is the case, you do not have to also report these assets on Form 8938, Statement of Specified Foreign Financial Assets. It is only necessary to complete Form 8938, Part IV, line 3. For more information, see the Instructions for Form 8938, generally, and in particular, *Duplicative Reporting*

and the specific instructions for *Part IV, Excepted Specified Foreign Financial Assets*.

## Item F—Person(s) on Whose Behalf This Information Return Is Filed

One person may file Form 5471 and the applicable schedules for other persons who have the same filing requirements. See [Multiple filers of same information](#), earlier. The person that files the required information on behalf of other persons must complete a joint Form 5471 according to the applicable column(s) of the *Filing Requirements for Categories of Filers* chart on page 4. This includes completing Item F on page 1 of the form. When completing item F with respect to members of a consolidated group, identify only the direct owners in item F (constructive owners are not required to be listed).

A separate Schedule I must be filed for each person described in Category 4 or 5. Also, unrelated section 958(a) U.S. shareholders are required to file Schedule I for foreign-controlled corporations. See [Certain Category 1 and Category 5 Filers](#) under *Categories of Filers*. For each Category 4 or Category 5 filer that is required to file a Schedule I, send a copy of their separate Schedule I to them to assist them in completing their tax return.

**Filing requirements for persons identified in Item F.** Except for members of the filer's consolidated return group, all persons identified in Item F must attach a statement to their tax returns that includes the following information.

- The name, address, and EIN (or reference ID number) of the foreign corporation(s).
- A statement that their filing requirements with respect to the foreign corporation(s) have been or will be satisfied.
- The name, address, and identifying number of the taxpayer on the return with which the information was or will be filed.
- The IRS Service Center where the return was or will be filed. If the return was or will be filed electronically, enter “e-file.”

**Exception.** If the person who is filing Form 5471 on behalf of others is married to a person identified in item F and they are filing Form 1040 jointly, the statement described above does not have to be attached to the jointly filed Form 1040.



*All persons identified in Item F must complete a separate Schedule P (Form 5471) if the person is a U.S. shareholder described in Category 1, 4, or 5. In such a case, the Schedule P must be attached to the statement described above.*

## Item 1b(2)—Reference ID Number

A reference ID number (defined below) is required on line 1b(2) only in cases where no EIN was entered on line 1b(1) for the foreign corporation. However, filers are permitted to enter both an EIN on line 1b(1) and a reference ID number on line 1b(2). If applicable, enter the reference ID number you have assigned to the foreign corporation identified on line 1a.

A "reference ID number" is a number established by or on behalf of the U.S. person identified at the top of page 1 of the form that is assigned to a foreign corporation with respect to which Form 5471 reporting is required. These numbers are used to uniquely identify the foreign corporation in order to keep track of the corporation from tax year to tax year.

The reference ID number must meet the requirements set forth below.

**Note.** Because reference ID numbers are established by or on behalf of the U.S. person filing Form 5471, there is no need to apply to the IRS to request a reference ID number or for permission to use these numbers.

**Note.** The reference ID number assigned to a foreign corporation on Form 5471 generally has relevance only on Form 5471, its schedules, and any other form that is attached to or associated with Form 5471, and generally should not be used with respect to that foreign corporation on any other IRS forms. However, the foreign corporation's reference ID number also should be entered on Form 8858 if the foreign corporation is listed as a tax owner of a foreign disregarded entity (FDE) or foreign branch (FB) on Form 8858. See the instructions for Form 8858, line 3c(2), for more information.

**Requirements.** The reference ID number that is entered in Item 1b(2) must be alphanumeric (defined later) and no special characters or spaces are permitted. The length of a given reference ID number is limited to 50 characters.

The same reference ID number must be used consistently from tax year to tax year with respect to a given foreign corporation. If for any reason a reference ID number falls out of use (for example, the foreign corporation no longer exists due to disposition or liquidation), the reference ID number used for that foreign corporation cannot be used again for another foreign corporation for purposes of Form 5471 reporting.

For these purposes, the term "alphanumeric" means the entry can be

alphabetical, numeric, or any combination of the two.

There are some situations that warrant correlation of a new reference ID number with a previous reference ID number when assigning a new reference ID number to a foreign corporation. For example:

- In the case of a merger or acquisition, a Form 5471 filer must use a reference ID number that correlates the previous reference ID number with the new reference ID number assigned to the foreign corporation; or
- In the case of an entity classification election that is made on behalf of a foreign corporation on Form 8832, Regulations section 301.6109-1(b)(2)(v) requires the foreign corporation to have an EIN for this election. For the first year that Form 5471 is filed after an entity classification election is made on behalf of the foreign corporation on Form 8832, the new EIN must be entered on line 1b(1) of Form 5471 and the old reference ID number must be entered on line 1b(2). In subsequent years, the Form 5471 filer may continue to enter both the EIN on line 1b(1) and the reference ID number on line 1b(2), but must enter at least the EIN on line 1b(1).

You must correlate the reference ID numbers as follows: New reference ID number [space] Old reference ID number. If there is more than one old reference ID number, you must enter a space between each such number. As indicated above, the length of a given reference ID number is limited to 50 characters and each number must be alphanumeric and no special characters are permitted.

**Note.** This correlation requirement applies only to the first year the new reference ID number is used.

## Items 1f and 1g—Principal Business Activity

Enter the principal business activity code number and the description of the activity from the list at the end of these instructions.

## Item 1h—Functional Currency

Enter the foreign corporation's functional currency. Regulations sections 1.6038-2(h) and 1.6046-1(g) require that certain amounts be reported in U.S. dollars and/or in the foreign corporation's functional currency. The specific instructions for the affected schedules state these requirements.

Special rules apply for foreign corporations that use the U.S. dollar approximate separate transactions method of accounting (DASTM) under Regulations section 1.985-3. See the instructions for [Schedule C](#) and [Schedule H](#).

## Schedule B

### Part I

Category 3 and 4 filers must complete Schedule B, Part I, for U.S. persons that owned (at any time during the annual accounting period), directly or indirectly through foreign entities, 10% or more in value or voting power of any class of the foreign corporation's outstanding stock.

**Column (e).** Enter each shareholder's allocable percentage of the foreign corporation's subpart F income.

### Part II

Category 1, 3, 4, and 5 filers must complete Part II. However, Category 1 and 5 filers who are unrelated section 958(a) U.S. shareholders are not required to file Schedule B, Part II for foreign-controlled corporations. See [Certain Category 1 and Category 5 Filers](#) under *Categories of Filers*.

Report the direct shareholders of the foreign corporation. In the case of a CFC owned by a foreign disregarded entity (FDE), please include the information of the FDE and the regarded entity owner. Indicate the regarded entity owner's name in parentheses after the FDE's name.

Category 4 filers should list all direct owners of the CFC. Category 1, 3, and 5 filers should list all direct owners of the CFC through which such filer indirectly owns the CFC as described in section 958(a)(2). If the filer is a direct owner, include the filer's direct ownership.

## Schedule C

Report all information in the foreign corporation's functional currency in accordance with U.S. Generally Accepted Accounting Principles (GAAP) and translate using U.S. GAAP translation principles.

If the foreign corporation uses the U.S. dollar approximate separate transactions method of accounting (DASTM) under Regulations section 1.985-3, the functional currency column should reflect local hyperinflationary currency amounts computed in accordance with U.S. GAAP. The U.S. dollar column should reflect such amounts translated into dollars under U.S. GAAP translation rules. Differences between this U.S. dollar GAAP column and the U.S. dollar income or loss figured for tax purposes under Regulations section 1.985-3(c) should be accounted for on Schedule H. See [Schedule H, Special rules for DASTM](#), later.

**Line 8.** Enter foreign currency transaction gain or loss reported on the income statement. For amounts included in Other Comprehensive Income (OCI), see the instructions for [Lines 23 and 24](#). Enter



unrealized gain or loss on line 8a and realized gain or loss on line 8b.

**Line 16.** Enter transactional taxes excluding items reportable in income tax expense (benefit). Report income taxes on line 21.

**Line 20.** The term “unusual or infrequently occurring items” is defined by U.S. GAAP (see FASB Accounting Standards Codification (ASC) Topic 225 (Income Statement), Subtopic 225-20 (Extraordinary and Unusual Items) or subsequent guidance). If “prior period adjustments” are not reported separately on the income statement, do not report such amounts on this line item (see ASC 250 (Accounting Changes and Error Corrections) or subsequent guidance).

**Line 21.** Enter income tax expense (benefit) reported in accordance with U.S. GAAP (ASC 740 (Income Taxes)). Income tax expense (benefit) includes current and deferred income tax expense (benefit). It also may reflect uncertain tax positions (ASC 740-10) and would not include taxes paid in respect of uncertain tax positions recorded in prior years. Enter the current income tax expense (benefit) on line 21a and deferred income tax expense (benefit) on line 21b.

**Note.** If there is an income tax expense amount on line 21a or 21b, subtract that amount from the line 19 net income or (loss) amount in arriving at line 22 current year net income or (loss) per the books. If there is an income tax benefit amount on line 21a or 21b, add that amount to the line 19 net income or (loss) amount in arriving at line 22 current year net income or (loss) per the books.

**Lines 23 and 24.** Enter amounts defined in ASC 220 (Comprehensive Income).

**Line 23a.** Enter foreign currency translation adjustments before the income tax expense (benefit) is allocated.

**Line 23b.** Enter other comprehensive income such as foreign currency gains or losses on certain hedging transactions, pensions and other post-retirement benefits, and certain investments available-for-sale.

**Line 23c.** Enter the income tax expense (benefit) allocated to OCI items in the intraperiod allocation.

**Important.** Differences between the functional currency amount of income tax expense (benefit) reported on line 21 and the amount of taxes that reduce or increase U.S. earnings and profits (E&P) should be accounted for on line 2g of Schedule H.

## Schedule F

Report all information in the foreign corporation's functional currency in accordance with U.S. GAAP and translate using U.S. GAAP translation rules. If the foreign corporation uses DASTM, the tax balance sheet on Schedule F should be prepared and translated into U.S. dollars according to Regulations section 1.985-3(d), rather than U.S. GAAP.

**Lines 3 and 17.** Enter the total asset amount of derivatives on line 3 and total amount of liability on line 17 reported in accordance with ASC 815 (Derivatives and Hedging). Do not net positions.

Include all derivatives, both short-term and long-term.

## Schedule G

**Note.** Category 5 filers who are unrelated section 958(a) U.S. shareholders are not required to file Schedule G for foreign-controlled corporations. See [Certain Category 1 and Category 5 Filers](#) under *Categories of Filers*.

### Question 1

If the foreign corporation owned at least a 10% interest, directly or indirectly, in any foreign partnership, attach a statement listing the following information for each foreign partnership.

1. Name and EIN (if any) of the foreign partnership.
2. Identify which, if any, of the following forms the foreign partnership filed for its tax year ending with or within the corporation's tax year: Form 1042, 1065, or 8804.
3. Name of the partnership representative (if any).
4. Beginning and ending dates of the foreign partnership's tax year.

### Question 3

Check the “Yes” box if the foreign corporation is the tax owner of a foreign disregarded entity (FDE) or a foreign branch (FB). The “tax owner” of an FDE is the person that is treated as owning the assets and liabilities of the FDE for purposes of U.S. income tax law.

If the foreign corporation is the tax owner of an FDE or FB and you are a Category 4 or 5 filer of Form 5471, you are required to attach Form 8858 to Form 5471.

If the foreign corporation is the tax owner of an FDE or FB and you are not a Category 4 or 5 filer of Form 5471, you must attach the statement described below in lieu of Form 8858.

**Statement in lieu of Form 8858.** This statement must list the name of the FDE, country under whose laws the FDE was organized, and EIN (if any) of the FDE.

## Questions 4b and 4c

Complete lines 4b and 4c if:

1. The foreign corporation is a related party to the U.S. filer within the meaning of section 59A(g), and
2. The U.S. filer made or accrued a base erosion payment to, or has a base erosion tax benefit with respect to, the foreign corporation.

The term “base erosion payment” generally means any amount paid or accrued by the U.S. filer to a foreign corporation that is a related party to the U.S. filer within the meaning of section 59A(g) and with respect to which a U.S. deduction is allowed under chapter 1 of the Code. See section 59A(d)(1). Base erosion payments also include amounts received or accrued by the foreign corporation in connection with the acquisition of depreciable or amortizable property (section 59A(d)(2)), reinsurance payments (section 59A(d)(3)), and certain payments relating to expatriated entities (section 59A(d)(4)).

The term “base erosion tax benefit” generally means any U.S. deduction which is allowed under Chapter 1 for the tax year with respect to any base erosion payment. See section 59A(c)(2)(A) and (B) for further details.

## Questions 5a and 5b

Section 267A disallows a deduction for certain interest and royalty payments or accruals. In general, section 267A applies when the following occur.

- The interest or royalty is paid or accrued to a related party.
- Under its tax laws, the related party either:
  1. Does not include the full amount in income, or
  2. Is allowed a deduction with respect to the amount.
- The amount is paid or accrued pursuant to a hybrid transaction or by, or to, a hybrid entity.

When section 267A applies, the deduction generally is disallowed to the extent the related party does not include the amount in income or is allowed a deduction with respect to the amount. However, the deduction is not disallowed to the extent the amount is included in the gross income of a U.S. shareholder under section 951(a).

For definitions of terms, see section 267A.

## Question 6

Check the “Yes” box on line 6a if the filer of this Form 5471 is claiming a deduction under section 250 with respect to foreign-derived intangible income (FDII), and enter the amounts requested on lines

6b, 6c, and 6d. Enter U.S. dollar amounts on lines 6b, 6c, and 6d, translated from functional currency at the average exchange rate for the foreign corporation's tax year (see section 989(b)). See Form 8993 and its instructions for information on the section 250 deduction. If no deduction is being claimed, check the "No" box and go to line 7.

### **Question 11**

Enter the foreign corporation's reasonably anticipated benefits (RAB) share of the total present value of all platform contributions made by the U.S. taxpayer during the tax year with respect to the foreign corporation, even if only a portion (or none) of the value of those platform contributions was included in the U.S. taxpayer's taxable income as platform contribution transaction (PCT) payments during the tax year. If possible, include a reasonable present value estimate for any PCTs that are priced using a method that does not involve the calculation of a present value. Otherwise, attach a brief statement of the reason(s) it is not possible to include a present value estimate for one or more PCTs (for example, no revenue projections for a PCT that is priced based on a sales-based royalty from a comparable uncontrolled transaction).

### **Question 12**

If the U.S. taxpayer engaged in multiple PCTs during the tax year with the foreign corporation and used different methods to price the PCTs, then check the appropriate boxes to indicate which methods were selected as the best method for one or more of the PCTs reported in the tax year. See Regulations section 1.482-7(g) for more information on the methods applicable to PCTs.

### **Question 14a**

Under section 367(d), a U.S. transferor must report an annual income inclusion attributed to the intangible property transferred to a foreign corporation over the useful life of the property. Check "Yes" if the foreign corporation received any intangible property in a prior year or the current tax year in an exchange under section 351 or section 361 from a U.S. transferor that is required to report a section 367(d) annual income inclusion for the tax year. If "Yes," complete line 14b.

### **Question 14b**

Enter the amount of the E&P reduction made by the foreign corporation for the current tax year that equals the amount required to be included in the income of the U.S. transferor. See section 367(d). This amount also should be entered on

Schedule H, Current Earnings and Profits, as a net subtraction on line 2i.

### **Question 15**

A foreign corporation may qualify as an expatriated foreign subsidiary under Regulations section 1.7874-12(a)(9) if such foreign corporation is a CFC with respect to which an expatriated entity as defined in Regulations section 1.7874-12(a)(8) is a U.S. shareholder. Certain transactions involving an expatriated foreign subsidiary and/or its U.S. shareholders may be subject to special rules. If the answer to question 15 is "Yes," attach a statement providing the name and EIN of the domestic corporation or partnership as defined in Regulations section 1.7874-12(a)(6) and the relationship of the foreign corporation to the domestic corporation or partnership.

### **Question 19**

Check the "Yes" box on line 19 if you answer "Yes" to any of the 22 questions in the Schedule G, Line 19 table below. If "Yes," enter the Corresponding Code(s) from the table in the entry space provided on line 19 of the form. Enter the applicable corresponding code in capital letters. Enter a space between each code. Also attach the statement described in the table below.

**Form 5471**

**Schedule G, Line 19**

	<b>Question</b>	<b>See Worksheet A in the Schedule I Instructions</b>	<b>If "Yes," Corresponding Code to enter on Schedule G, line 19</b>	<b>Code Description</b>	<b>If "Yes," content of statement to be attached to Form 5471</b>
1	During the tax year, was the sum of the CFC's foreign base company income (determined without regard to deductions) and gross insurance income less than the lesser of 5% of gross income or \$1 million?	In other words, is line 7 less than line 8 and less than \$1M?	<b>DM</b>	De minimis	Amount excluded by reason of the de minimis rule (but only to the extent not already included in amounts below)
2	During the tax year, did the CFC receive any item of income that was subject to an effective rate of income tax imposed by a foreign country greater than 90% of the maximum rate of tax specified in section 11?	In other words, is line 13g, 14d, 15d, 16d, 18d, or 19d of Worksheet A greater than zero?	<b>HT</b>	High Tax	Sum of the amounts from lines 13g, 14d, 15d, 16d, 18d, and 19d
3	During the tax year, was the CFC's foreign personal holding company income, foreign base company sales income, or foreign base company services income reduced so as to take into account any deductions (including taxes)?	In other words, is line 13b, 13d, 13e, 14b, 15b, or 16b of Worksheet A greater than zero?	<b>DED</b>	Deductions taken into account	Sum of the amounts from lines 13b, 13d, 13e, 14b, 15b, and 16b
4	During the tax year, did the CFC have any gains or losses that (i) arise out of commodity hedging transactions, (ii) are active business gains or losses from the sale of commodities (and substantially all of the corporation's commodities are property described in section 1221(a)(1), (2), or (8)), or (iii) are foreign currency gains or losses (as defined in section 988(b)) attributable to any section 988 transactions?	In other words, are any amounts described in section 954(c)(1)(C)(i), (ii), or (iii) excluded from line 1c of Worksheet A?	<b>AHC</b>	Active/hedging commodities	Sum of the excluded amounts described in section 954(c)(1)(C)(i), (ii), and (iii)
5	During the tax year, did the CFC have excess foreign currency gains over foreign currency losses as defined in section 988(b) attributable to any section 988 transaction directly related to the business needs of the foreign corporation?	In other words, are any amounts excluded from line 1d of Worksheet A by reason of being attributable to a transaction(s) directly related to the business needs of the foreign corporation?	<b>BN</b>	Business needs	Amount excluded
6	During the tax year, did the CFC receive, from a person other than a related person within the meaning of section 954(d)(3), rents or royalties that were derived in the active conduct of a trade or business?	In other words, are any amounts described in section 954(c)(2)(A) excluded from line 1a of Worksheet A?	<b>ARR</b>	Active rents/royalties	Amount excluded
7	During the tax year, did the CFC derive, in the conduct of a banking business, interest that is export financing interest?	In other words, are any amounts described in section 954(c)(2)(B) excluded from line 1a of Worksheet A?	<b>EF</b>	Certain export financing	Amount excluded
8	During the tax year, was the CFC a regular dealer in property described in section 954(c)(1)(B), forward contracts, option contracts, or similar financial instruments (including notional principal contracts and all instruments referenced to commodities)? If so, did the foreign corporation derive any item of income, gain, deduction, or loss (other than any item described in section 954(c)(1)(A), (E), or (G)) from any transaction entered into in the ordinary course of its trade or business as a regular dealer?	In other words, are any amounts described in section 954(c)(2)(C)(i) excluded from line 1a of Worksheet A?	<b>RD</b>	Regular dealers	Amount excluded
9	During the tax year, was the CFC a securities dealer within the meaning of section 475? If so, did the foreign corporation derive any interest or dividend or equivalent amount described in section 954(c)(1)(E) or (G) from any transaction entered into in the ordinary course of its trade or business as a securities dealer?	In other words, are any amounts described in section 954(c)(2)(C)(ii) excluded from line 1a of Worksheet A?	<b>SD</b>	Securities dealers	Amount excluded

Form 5471, Schedule G, Line 19, continued

	Question	See Worksheet A in the Schedule I Instructions	If "Yes," Corresponding Code to enter on Schedule G, line 19	Code Description	If "Yes," content of statement to be attached to Form 5471
10	<p>During the tax year, did the CFC receive dividends* or interest** from a related person that (i) is a corporation created or organized under the laws of the same country under the laws of which the CFC is created or organized, and (ii) has a substantial part of its assets used in its trade or business located in the same foreign country?</p> <p>*Dividends (other than dividends with respect to any stock, which is attributable to earnings and profits of the distributing corporation, accumulated during any period during which the person receiving such dividend did not hold such stock directly or indirectly through a chain of one or more subsidiaries each of which meets the requirements (i) and (ii)).</p> <p>**Interest (other than interest that reduces the payor's subpart F income or creates or increases a deficit that may reduce the subpart F income of the payor or another CFC).</p>	In other words, are any amounts described in section 954(c)(3)(A)(i) excluded from line 1a of Worksheet A?	<b>SCDI</b>	Same country dividends/ interest	Amount excluded
11	<p>During the tax year, did the CFC receive, from a corporation that is a related person, rents or royalties* for the use of, or privilege of using, property within the country under the laws of which the CFC is created or organized?</p> <p>*Rents or royalties (other than rents or royalties that reduce the payor's subpart F income or create or increase a deficit that may reduce the subpart F income of the payor or another CFC).</p>	In other words, are any amounts described in section 954(c)(3)(A)(ii) excluded from line 1a of Worksheet A?	<b>SCRR</b>	Same country rents/royalties	Amount excluded
12	During the tax year, did the CFC receive or accrue from a related CFC dividends, interest (including factoring income treated as income equivalent to interest for purposes of section 954(c)(1)(E)), rents, or royalties attributable or properly allocable to income of the related person which is neither subpart F income nor income treated as effectively connected with the conduct of a trade or business in the United States?	In other words, are any amounts excluded from line 1a of Worksheet A by reason of the look through rule described in section 954(c)(6)?	<b>LT</b>	Look through	Amount excluded
13	During the tax year, did the CFC derive income (either directly or through a branch or similar establishment, for example, disregarded entity) in connection with the purchase or sale from, to, or on behalf of a related person, of agricultural commodities not grown in the United States in commercially marketable quantities?	In other words, are any amounts excluded from line 3 of Worksheet A by reason of the special rule in Regulations section 1.954-3(a)(1)(ii)?	<b>AC</b>	Agricultural commodities	Amount excluded
14	During the tax year, did the CFC derive income (either directly or through a branch or similar establishment, for example, disregarded entity) in connection with the purchase or sale from, to, or on behalf of a related person, of personal property manufactured in the same country under the laws of which the CFC is created or organized?	In other words, are any amounts that are derived in connection with property that does not satisfy section 954(d)(1)(A) excluded from line 3 of Worksheet A (that is, income excluded by reason of Regulations section 1.954-3(a)(2))?	<b>SCM</b>	Same country manufacturing	Amount excluded
15	During the tax year, did the CFC derive income (either directly or through a branch or similar establishment, for example, disregarded entity) in connection with the purchase or sale from, to, or on behalf of a related person, of personal property purchased or sold for use or consumption in the same country under the laws of which the CFC is created or organized?	In other words, are any amounts that are derived in connection with property that does not satisfy section 954(d)(1)(B) excluded from line 3 of Worksheet A (that is, income excluded by reason of Regulations section 1.954-3(a)(3))?	<b>SCSU</b>	Same country sales/use	Amount excluded
16	During the tax year, did the CFC derive income (either directly or through a branch or similar establishment, for example, disregarded entity) in connection with the purchase or sale from, to, or on behalf of a related person, of personal property manufactured by the CFC within the meaning of Regulations section 1.954-3(a)(4) (ii) or (iii)?	In other words, are any amounts excluded from line 3 of Worksheet A by reason of Regulations section 1.954-3(a)(4)(ii) or (iii)?	<b>PM</b>	Physical manufacturing	Amount excluded

**Form 5471, Schedule G, Line 19, continued**

	<b>Question</b>	<b>See Worksheet A in the Schedule I Instructions</b>	<b>If "Yes," Corresponding Code to enter on Schedule G, line 19</b>	<b>Code Description</b>	<b>If "Yes," content of statement to be attached to Form 5471</b>
17	During the tax year, did the CFC derive income (either directly or through a branch or similar establishment, for example, disregarded entity) in connection with the purchase or sale from, to, or on behalf of a related person, of personal property manufactured by the CFC within the meaning of Regulations section 1.954-3(a)(4)(iv)?	In other words, are any amounts excluded from line 3 of Worksheet A by reason of Regulations section 1.954-3(a)(4)(iv)?	<b>SC</b>	Substantial contribution	Amount excluded
18	(a) During the tax year, did the CFC derive income in connection with the purchase from or sale to a related or unrelated person of personal property manufactured or sold for use outside the country under the laws of which the CFC is created or organized (for example, property manufactured or sold by a disregarded entity of the CFC)? (b) During the tax year, did the CFC derive income (either directly or through a branch or similar establishment, for example, disregarded entity) in connection with the purchase or sale from, to, or on behalf of a related party (for example, purchase or sales commission income)?	In other words, are any amounts excluded from line 3 of Worksheet A by reason of disregarding a branch or similar establishment (including a disregarded entity) of the CFC corporation as separate from the CFC?	<b>BR</b>	Branch	Amount excluded
19	During the tax year, was the CFC an eligible CFC (as defined in section 954(h)(2)) that derived qualified banking or financing income (as defined in section 954(h)(3))?	In other words, are any amounts excluded from lines 1a-1i of Worksheet A by reason of the special rule described in section 954(h)?	<b>AF</b>	Active financing	Amount excluded
20	During the tax year, was the CFC a qualifying insurance company (as defined in section 953(e)(3)) that derived qualified insurance income (as defined in section 954(i)(2))?	In other words, are any amounts excluded from lines 1a-1i of Worksheet A by reason of the special rule described in section 954(i)?	<b>AI</b>	Active insurance	Amount excluded
21	During the tax year, did the subpart F income of the CFC exceed the earnings and profits of such corporation?	In other words, is line 36 of Worksheet A greater than line 37c?	<b>EP</b>	Earnings & profits limitation	Excess of line 36 over line 37c
22	Is the U.S. person filing this return relying on any exception(s), exclusion(s), or other provision(s) not listed above to reduce or exclude any amounts reported or reportable as subpart F income (of or with respect to the CFC)?		<b>XX</b>	Other	Amount excluded, reduction amount, or other amount not reported or reportable

## Question 20

For the foreign corporation's annual accounting period with respect to which reporting is being made on this Form 5471, if the foreign corporation is required to file a U.S. income tax return (for example, Form 1120-F), check the "Yes," box if the foreign corporation has interest expense disallowed under section 163(j). If "Yes," enter the amount from the current year Form 8990, line 31.

## Question 21

For the foreign corporation's annual accounting period with respect to which reporting is being made on this Form 5471, if the foreign corporation is required to file a U.S. income tax return (for example, Form 1120-F), check the "Yes," box if the foreign corporation has previously disallowed interest expense under section 163(j) carried forward to the current tax year. If "Yes," enter the amount from the prior year Form 8990, line 31.

## Schedule I

Use Schedule I to report in U.S. dollars the U.S. shareholder's pro rata share of income from the foreign corporation reportable under subpart F and other income realized from a corporate distribution.

Certain filers may be able to use alternative information (as defined in section 3.01 of Rev. Proc. 2019-40) to determine certain amounts in this schedule. See Rev. Proc. 2019-40 for more details.

**Note.** A separate Schedule I must be filed by or for each Category 4 or 5 U.S. shareholder of the foreign corporation with respect to which reporting is furnished on this Form 5471. However, Category 5 filers who are related constructive U.S. shareholders are not required to file Schedule I for foreign-controlled corporations. See [Certain Category 1 and Category 5 Filers](#) under *Categories of Filers*.

### Line 1

**Subpart F income.** U.S. shareholders of CFCs with subpart F income must report that income on their tax returns. For more information, see sections 245A, 951, 952, and 964(e).

### Line 1a

Enter the foreign-source portion of any subpart F inclusions attributable to the sale or exchange by a CFC of stock in another foreign corporation described in section 964(e)(4).

### Line 1b

Enter the amount of hybrid dividends received from any other CFC that is treated as subpart F income under section

245A(e)(2). A hybrid dividend generally is any dividend from a CFC for which the CFC received a deduction (or other tax benefit) for foreign tax purposes.

### Lines 1c through 1f

Enter on lines 1c through 1f the amounts from Worksheet A, lines 63, 65, 67, and 69, respectively.

Use Worksheet A, later, in these instructions, to compute the U.S. shareholder's pro rata share of subpart F income of the CFC, which is reportable on lines 1c through 1f. Do not include any income includible on Form 5471, Schedule I, lines 1a and 1b, or any income includible under section 951A (Schedule I-1 is used to provide information relating to section 951A). Subpart F income reportable on lines 1c through 1f includes the following.

- Adjusted net foreign base company income (lines 1 through 17).
- Adjusted net insurance income (line 18).
- Adjusted net related person insurance income (line 19).
- International boycott income (line 20).
- Illegal bribes, kickbacks, and other payments (line 21).
- Income described in section 952(a)(5) (line 22).

**Important.** If the subpart F income of any CFC for any tax year was reduced because of the current E&P limitation, any excess of the E&P of the CFC for any subsequent tax year over the subpart F income of the CFC for the tax year must be recharacterized as subpart F income. As a result, if the foreign corporation has E&P for the taxable period covered by this return that is subject to recapture as a result of a prior-year E&P limitation, add such recapture amount to the result from Worksheet A, Line 69, and include the combined amount on Line 1f (Other subpart F income). See the instructions for [Line 37. Current E&P limitation](#), later, for a discussion of the current-year E&P limitation.

### Line 2

Report on line 2 earnings invested in U.S. property (Worksheet B).

### Line 3

If the foreign corporation with respect to which information is being reported on this Form 5471 is a specified 10%-owned foreign corporation (as defined in section 245A(b)), for each domestic corporate shareholder of that specified 10%-owned foreign corporation, enter on line 3 the foreign-source portion (as defined in section 245A(c)) of all dividends paid by that specified 10%-owned foreign corporation to the domestic corporate shareholder. Include gain from the sale of stock of the foreign corporation that is

treated as a dividend under sections 1248(a) and (j).

The domestic corporate shareholder will take this line 3 amount into account when determining the amount to enter on Form 1120, Schedule C, line 13, column (a), or the comparable line of other corporate income tax returns. In doing so, the domestic corporate shareholder will take into account the rules of section 246(c)(5) and other applicable rules (such as those specified in sections 246(a)(1), 246(c)(1), 1059, and Temporary Regulations section 1.245A-5T).

If the foreign corporation with respect to which information is being reported on this Form 5471 disposed of an asset or assets in one or more extraordinary dispositions within the meaning of Temporary Regulations section 1.245A-5T(c)(3)(ii) in a prior taxable period of the foreign corporation, attach a statement to this Form 5471 describing each such transaction, including the resulting amount of extraordinary disposition earnings and profits within the meaning of Temporary Regulations section 1.245A-5T(c)(3)(C). Also include a statement of the balance of the extraordinary disposition account of the U.S. shareholder of the foreign corporation with respect to which information is being reported on this Form 5471 as of the end of the reporting period.

If the U.S. shareholder of the foreign corporation with respect to which information is being reported on this Form 5471 had one or more reductions in ownership of the foreign corporation that resulted in one or more extraordinary reductions within the meaning of Temporary Regulations section 1.245A-5T(e)(2)(i) in a prior or current tax period of the foreign corporation, attach a statement to this Form 5471 providing each extraordinary reduction amount within the meaning of Temporary Regulations section 1.245A-5T(e)(1). If the U.S. shareholder of the foreign corporation with respect to which information is being reported on this Form 5471 intends to elect to close the tax year of the CFC pursuant to Temporary Regulations section 1.245A-5T(e)(3)(i) with respect to one or more extraordinary reductions, attach a statement to this Form 5471 following the procedures set forth in that Regulation.

If the foreign corporation with respect to which information is being reported on this Form 5471 distributed one or more ineligible amounts within the meaning of Temporary Regulations section 1.245A-5T(b) to the U.S. shareholder of the foreign corporation for which information is being reported on this Form 5471 in a prior or current tax period of the foreign corporation, attach a statement to this Form 5471 separately providing the

amount of each ineligible amount distributed attributable to extraordinary disposition E&P and each ineligible amount distributed attributable to extraordinary reduction E&P within the meaning of Temporary Regulations sections 1.245A-5T(c) and (e), respectively.

If the foreign corporation with respect to which information is being reported on this Form 5471 received one or more tiered extraordinary disposition amounts or tiered extraordinary reduction amounts within the meaning of Temporary Regulations sections 1.245A-5T(d)(2) or 1.245A-5T(f)(2) in a prior or current tax period of the foreign corporation, attach a statement to this Form 5471 separately providing the amount of each tiered extraordinary disposition amount and tiered extraordinary reduction amount received by the foreign corporation, as well as the name and employer identification number of the distributor, if any.

#### **Line 4**

Enter the factoring income (as defined in section 864(d)(1)) if no subpart F income

is reported on line 1a, Worksheet A, because of the operation of the de minimis rule (see lines 1a and 10 of Worksheet A and the related instructions at [Line 1a](#) and [Line 10. De minimis rule](#)).

#### **Reporting amounts on lines 1 through 4 on your income tax return**

U.S. shareholders should compute their pro rata share of the income on Form 5471, Schedule I, lines 1a through 1f, 2, and 4. For a corporate shareholder, enter the result on Form 1120, Schedule C, line 16c, or on the comparable line of other corporate tax returns. For a noncorporate U.S. shareholder, enter the result on Schedule 1 (Form 1040 or 1040-SR), line 8 (Other income), or on the comparable line of other noncorporate tax returns.

#### **Line 5**

Enter the dividends you received from the foreign corporation that were not previously taxed under subpart F in the current year or in any prior year.

#### **Line 6**

If previously taxed E&P (PTEP) described in section 959(a) or (b) was distributed, enter the amount of foreign currency gain or (loss) on the distribution, computed under section 986(c). See Notice 88-71, 1988-2 C.B. 374, for rules for computing section 986(c) gain or (loss).

For a corporate U.S. shareholder, include the gain or (loss) as "Other income" on Form 1120, line 10, or on the comparable line of other corporate tax returns. For a noncorporate U.S. shareholder, include the result as "Other income" on Schedule 1 (Form 1040 or 1040-SR), line 8, or on the comparable line of other noncorporate tax returns.

Certain current year deficits of a member of the same chain of corporations may be considered in determining subpart F income. See section 952(c)(1)(C).

**Summary of U.S. Shareholder's Pro Rata Share of Subpart F Income of a CFC** (See Worksheet A instructions, later.) Enter the amounts on lines 1a through 62, 64, 66, and 68 in functional currency.

<b>1 Gross foreign personal holding company income:</b>			
a	Dividends, interest, royalties, rents, and annuities (section 954(c)(1)(A) (excluding amounts described in sections 954(c)(2), (3), and (6)) . . . . .	<b>1a</b>	
b	Excess of gains over losses from certain property transactions (section 954(c)(1)(B)) . . . . .	<b>1b</b>	
c	Excess of gains over losses from commodity transactions (section 954(c)(1)(C)) . . . . .	<b>1c</b>	
d	Excess of foreign currency gains over foreign currency losses (section 954(c)(1)(D)) . . . . .	<b>1d</b>	
e	Income equivalent to interest (section 954(c)(1)(E)) . . . . .	<b>1e</b>	
f	Net income from a notional principal contract (section 954(c)(1)(F)) . . . . .	<b>1f</b>	
g	Payments in lieu of dividends (section 954(c)(1)(G)) . . . . .	<b>1g</b>	
h	Certain amounts received for services under personal service contracts (see section 954(c)(1)(H)) . . . . .	<b>1h</b>	
i	Certain amounts from sales of partnership interests to which the look-through rule of section 954(c)(4) applies . . . . .	<b>1i</b>	
<b>2</b>	<b>Gross foreign personal holding company income.</b> Add lines 1a through 1i. . . . .		<b>2</b>
<b>3</b>	<b>Gross foreign base company sales income</b> (see section 954(d)) . . . . .		<b>3</b>
<b>4</b>	<b>Gross foreign base company services income</b> (see section 954(e)) . . . . .		<b>4</b>
<b>5</b>	<b>Gross foreign base company income.</b> Add lines 2 through 4 . . . . .		<b>5</b>
<b>6</b>	<b>Gross insurance income</b> (see sections 953 and 954(b)(3)(C) and the instructions for lines 18 and 19) . . . . .		<b>6</b>
<b>7</b>	<b>Gross foreign base company income and gross insurance income.</b> Add lines 5 and 6 . . . . .		<b>7</b>
<b>8</b>	<b>Enter 5% of total gross income</b> (as computed for income tax purposes) . . . . .		<b>8</b>
<b>9</b>	<b>Enter 70% of total gross income</b> (as computed for income tax purposes) . . . . .		<b>9</b>
<b>10</b>	If line 7 is less than line 8 and less than \$1 million, enter -0- on this line and skip lines 11 through 19 . . . . .		<b>10</b>
<b>11</b>	If line 7 is more than line 9, enter total gross income (as computed for income tax purposes) . . . . .		<b>11</b>
<b>12</b>	<b>Total adjusted gross foreign base company income and insurance income</b> (enter the greater of line 7 or line 11) . . . . .		<b>12</b>
<b>13 Adjusted net foreign personal holding company income:</b>			
a	Enter amount from line 2 . . . . .	<b>13a</b>	
b	Expenses directly related to amount on line 2 . . . . .	<b>13b</b>	
c	Subtract line 13b from line 13a . . . . .	<b>13c</b>	
d	Related person interest expense (see section 954(b)(5)) . . . . .	<b>13d</b>	
e	Other expenses allocated and apportioned to the amount on line 2 under section 954(b)(5) . . . . .	<b>13e</b>	
f	Net foreign personal holding company income. Subtract the sum of lines 13d and 13e from line 13c . . . . .	<b>13f</b>	
g	Net foreign personal holding company income excluded under high-tax exception . . . . .	<b>13g</b>	
h	Subtract line 13g from line 13f . . . . .		<b>13h</b>
<b>14 Adjusted net foreign base company sales income:</b>			
a	Enter amount from line 3 . . . . .	<b>14a</b>	
b	Expenses allocated and apportioned to the amount on line 3 under section 954(b)(5) . . . . .	<b>14b</b>	
c	Net foreign base company sales income. Subtract line 14b from line 14a . . . . .	<b>14c</b>	
d	Net foreign base company sales income excluded under high-tax exception . . . . .	<b>14d</b>	
e	Subtract line 14d from line 14c . . . . .		<b>14e</b>
<b>15 Adjusted net foreign base company services income:</b>			
a	Enter amount from line 4 . . . . .	<b>15a</b>	
b	Expenses allocated and apportioned to line 4 under section 954(b)(5) . . . . .	<b>15b</b>	
c	Net foreign base company services income. Subtract line 15b from line 15a . . . . .	<b>15c</b>	
d	Net foreign base company services income excluded under high-tax exception . . . . .	<b>15d</b>	
e	Subtract line 15d from line 15c . . . . .		<b>15e</b>
<b>16 Adjusted net full inclusion foreign base company income:</b>			
a	Enter the excess, if any, of line 11 over line 7 . . . . .	<b>16a</b>	
b	Expenses allocated and apportioned under section 954(b)(5) . . . . .	<b>16b</b>	
c	Net full inclusion foreign base company income. Subtract line 16b from line 16a . . . . .	<b>16c</b>	
d	Net full inclusion foreign base company income excluded under high-tax exception . . . . .	<b>16d</b>	
e	Subtract line 16d from line 16c . . . . .		<b>16e</b>



Worksheet A

Worksheet A (continued) (See instructions.)

<b>17</b>	<b>Adjusted net foreign base company income.</b> Add lines 13h, 14e, 15e, and 16e . . . . .		<b>17</b>
<b>18</b>	<b>Adjusted net insurance income</b> (other than related person insurance income):		
<b>a</b>	Enter amount from line 6 (other than related person insurance income)	<b>18a</b>	
<b>b</b>	Expenses allocated and apportioned to the amount on line 18a under section 953 . . . . .	<b>18b</b>	
<b>c</b>	Net insurance income. Subtract line 18b from line 18a . . . . .	<b>18c</b>	
<b>d</b>	Net insurance income excluded under high-tax exception . . . . .	<b>18d</b>	
<b>e</b>	Subtract line 18d from line 18c . . . . .		<b>18e</b>
<b>19</b>	<b>Adjusted net related person insurance income:</b>		
<b>a</b>	Enter amount from line 6 that is related person insurance income . . . . .	<b>19a</b>	
<b>b</b>	Expenses allocated and apportioned to the amount on line 19a under section 953 . . . . .	<b>19b</b>	
<b>c</b>	Net related person insurance income. Subtract line 19b from line 19a . . . . .	<b>19c</b>	
<b>d</b>	Net related person insurance income excluded under high-tax exception . . . . .	<b>19d</b>	
<b>e</b>	Subtract line 19d from line 19c . . . . .		<b>19e</b>
<b>20</b>	International boycott income (section 952(a)(3)) . . . . .		<b>20</b>
<b>21</b>	Illegal bribes, kickbacks, and other payments (section 952(a)(4)) . . . . .		<b>21</b>
<b>22</b>	Income described in section 952(a)(5) (see instructions) . . . . .		<b>22</b>
<b>23</b>	Subpart F income before application of sections 952(b) and (c) and section 959(b). Add lines 17, 18e, 19e, and 20 through 22 . . . . .		<b>23</b>
<b>24</b>	Enter the portion of line 13h that is U.S. source income effectively connected with a U.S. trade or business (section 952(b)) . . . . .	<b>24</b>	
<b>25</b>	Exclusions under section 959(b) that apply to line 13h amount . . . . .	<b>25</b>	
<b>26</b>	<b>Section 954(c) subpart F Foreign Personal Holding Company Income.</b> Subtract the sum of lines 24 and 25 from line 13h . . . . .		<b>26</b>
<b>27</b>	Enter the portion of line 14e that is U.S. source income effectively connected with a U.S. trade or business (section 952(b)) . . . . .	<b>27</b>	
<b>28</b>	Exclusions under section 959(b) that apply to line 14e amount . . . . .	<b>28</b>	
<b>29</b>	<b>Section 954(d) subpart F Foreign Base Company Sales Income.</b> Subtract the sum of lines 27 and 28 from line 14e. . . . .		<b>29</b>
<b>30</b>	Enter the portion of line 15e that is U.S. source income effectively connected with a U.S. trade or business (section 952(b)) . . . . .	<b>30</b>	
<b>31</b>	Exclusions under section 959(b) that apply to line 15e amount . . . . .	<b>31</b>	
<b>32</b>	<b>Section 954(e) subpart F Foreign Base Company Services Income.</b> Subtract the sum of lines 30 and 31 from line 15e . . . . .		<b>32</b>
<b>33</b>	Enter the sum of the portion of lines 16e, 18e, 19e, 20, 21, and 22 that is U.S. source income effectively connected with a U.S. trade or business (section 952(b)) . . . . .	<b>33</b>	
<b>34</b>	Exclusions under section 959(b) that apply to line 16e, 18e, 19e, 20, 21, and 22 amounts . . . . .	<b>34</b>	
<b>35</b>	<b>Other subpart F income.</b> Subtract the sum of lines 33 and 34 from the sum of lines 16e, 18e, 19e, 20, 21, and 22 . . . . .		<b>35</b>
<b>36</b>	<b>Total subpart F income.</b> Add lines 26, 29, 32, and 35 . . . . .		<b>36</b>
<b>37</b>	<b>Current E&amp;P limitation computation:</b>		
<b>a</b>	Current E&P . . . . .	<b>37a</b>	
<b>b</b>	Tested loss (enter as a positive number – see instructions) . . . . .	<b>37b</b>	
<b>c</b>	Total of line 37a and line 37b . . . . .	<b>37c</b>	
<b>38</b>	Enter the smaller of line 36 or line 37c . . . . .		<b>38</b>

Worksheet A

**Worksheet A (continued)** (See instructions.)

<b>39</b>	If the amount on line 37c is less than the amount on line 36, allocate the subpart F income remaining (after having been limited) to lines 40, 41, 42, and 43 below in the manner prescribed by Regulations section 1.952-1(e). If the amount on line 37c is greater than or equal to the amount on line 36, enter the amount from line 26 onto line 40, enter the amount from line 29 onto line 41, enter the amount from line 32 onto line 42, and enter the amount from line 35 onto line 43.		
<b>40</b>	Section 954(c) subpart F Foreign Personal Holding Company Income subtotal . . . . .	<b>40</b>	
<b>41</b>	Section 954(c) subpart F Foreign Base Company Sales Income subtotal . . . . .	<b>41</b>	
<b>42</b>	Section 954(c) subpart F Foreign Base Company Services Income subtotal . . . . .	<b>42</b>	
<b>43</b>	Other subpart F income subtotal . . . . .	<b>43</b>	
<b>44</b>	Shareholder's pro rata share of line 40 . . . . .	<b>44</b>	
<b>45</b>	Shareholder's pro rata share of export trade income that applies to line 44 amount (see section 970(a)) . . . . .	<b>45</b>	
<b>46</b>	Section 954(c) subpart F Foreign Personal Holding Company Income subtotal. Subtract line 45 from line 44 . . . . .	<b>46</b>	
<b>47</b>	Shareholder's pro rata share of line 41 . . . . .	<b>47</b>	
<b>48</b>	Shareholder's pro rata share of export trade income that applies to line 47 amount (see section 970(a)) . . . . .	<b>48</b>	
<b>49</b>	Section 954(c) subpart F Foreign Base Company Sales Income subtotal. Subtract line 48 from line 47 . . . . .	<b>49</b>	
<b>50</b>	Shareholder's pro rata share of line 42 . . . . .	<b>50</b>	
<b>51</b>	Shareholder's pro rata share of export trade income that applies to line 50 amount (see section 970(a)) . . . . .	<b>51</b>	
<b>52</b>	Section 954(c) subpart F Foreign Base Company Services Income subtotal. Subtract line 51 from line 50 . . . . .	<b>52</b>	
<b>53</b>	Shareholder's pro rata share of line 43 . . . . .	<b>53</b>	
<b>54</b>	Shareholder's pro rata share of export trade income that applies to line 53 amount (see section 970(a)) . . . . .	<b>54</b>	
<b>55</b>	Other subpart F income subtotal. Subtract line 54 from line 53 . . . . .	<b>55</b>	
<b>56</b>	Add lines 46, 49, 52, and 55 . . . . .	<b>56</b>	
<b>57</b>	Divide the number of days in the tax year that the corporation was a CFC by the number of days in the tax year and multiply the result by line 56 . . . . .	<b>57</b>	
<b>58</b>	Dividends paid to any other person with respect to your stock during the tax year . . . . .	<b>58</b>	
<b>59</b>	Divide the number of days in the tax year you did not own such stock by the number of days in the tax year and multiply the result by line 56 . . . . .	<b>59</b>	
<b>60</b>	Enter the smaller of line 58 or line 59 . . . . .	<b>60</b>	
<b>61</b>	<b>Shareholder's pro rata share of subpart F income.</b> Subtract line 60 from line 57 . . . . .	<b>61</b>	
<b>62</b>	Amount of line 61 that applies to section 954(c) subpart F Foreign Personal Holding Company Income . . . . .	<b>62</b>	
<b>63</b>	Translate the amount on line 62 from functional currency to U.S. dollars at the average exchange rate. See section 989(b). Enter the result here and on Form 5471, Schedule I, line 1c . . . . .	<b>63</b>	
<b>64</b>	Amount of line 61 that applies to section 954(c) subpart F Foreign Base Company Sales Income . . . . .	<b>64</b>	
<b>65</b>	Translate the amount on line 64 from functional currency to U.S. dollars at the average exchange rate. See section 989(b). Enter the result here and on Form 5471, Schedule I, line 1d . . . . .	<b>65</b>	
<b>66</b>	Amount of line 61 that applies to section 954(c) subpart F Foreign Base Company Services Income . . . . .	<b>66</b>	
<b>67</b>	Translate the amount on line 66 from functional currency to U.S. dollars at the average exchange rate. See section 989(b). Enter the result here and on Form 5471, Schedule I, line 1e . . . . .	<b>67</b>	
<b>68</b>	Amount of line 61 that applies to other subpart F income . . . . .	<b>68</b>	
<b>69</b>	Translate the amount on line 68 from functional currency to U.S. dollars at the average exchange rate. See section 989(b). Enter the result here and on Form 5471, Schedule I, line 1f . . . . .	<b>69</b>	

## Worksheet A Instructions

### Foreign base company income.

Foreign base company income generally does not include the following.

- Foreign base company shipping income as defined in former section 954(f).
- Foreign personal holding company income derived in the active conduct of a banking, finance, or similar business (section 954(h)).
- Exempt insurance income under section 953(e) and certain investment income of a qualifying insurance company or a qualifying insurance branch (section 953(a)(2) and 954(i)).
- Certain income derived in the ordinary course of business of a securities dealer (section 954(c)(2)(C)(i)).

**Line 1a. Do not** include the following:

- Interest from conducting a banking business that is “export financing interest” (section 904(d)(2)(G));
- Rents and royalties from actively conducting a trade or business received from a person other than a “related person” (as defined in section 954(d)(3)); and
- Dividends, interest, rent, or royalty income from related corporate payors described in sections 954(c)(3) or (6). However, see section 964(e) for an exception to section 954(c)(3) and section 964(e)(4) for an exception to section 954(c)(6).

Interest income includes factoring income arising when a person acquires a trade or service receivable (directly or indirectly) from a related person. The income is treated as interest on a loan to the obligor under section 864(d)(1) and generally is not eligible for the de minimis, export financing, and related party exceptions to the inclusion of subpart F income. Also, a trade or service receivable acquired or treated as acquired by a CFC from a related U.S. person is considered an investment in U.S. property for purposes of section 956 (Worksheet B) if the obligor is a U.S. person.

**Line 1b.** Enter the excess of gains over losses from the sale or exchange of:

- Property that produces the type of income reportable on line 1a;
- An interest in a trust, partnership, or REMIC. However, see the instructions for [Line 1i](#) for an exception that provides for look-through treatment for certain sales of partnership interests; or
- Property that does not produce any income.

**Do not** include the following.

- Income, gain, deduction, or loss from any transaction (including a hedging transaction) and transactions involving physical settlement of a regular dealer in property, forward contracts, option

contracts, and similar financial instruments (section 954(c)(2)(C)).

- Gains and losses from the sale or exchange of any property that, in the hands of the CFC, is property described in section 1221(a)(1).

**Line 1c.** Enter the excess of gains over losses from transactions (including futures, forward, and similar transactions) in any commodities. See section 954(c)(1)(C) for exceptions. See section 954(c)(5) for a definition and special rules relating to commodity transactions.

**Line 1d.** Enter the excess of foreign currency gains over foreign currency losses from section 988 transactions. An exception applies to transactions directly related to the business needs of a CFC.

**Line 1e.** Enter any income equivalent to interest, including income from commitment fees (or similar amounts) for loans actually made.

**Line 1f.** Include net income from notional principal contracts (except a contract entered into to hedge inventory property).

**Line 1g.** Include payments in lieu of dividends that are made as required under section 1058.

**Line 1h.** Enter amounts received:

- Under a contract under which the corporation is to furnish personal services if (a) some person other than the corporation has a right to designate (by name or by description) the individual who is to perform the services, or (b) the individual who is to perform the services is designated (by name or by description) in the contract; and
- From the sale or other disposition of such a contract.

**Note.** The above rules apply with respect to amounts received for services under a particular contract only if at some time during the tax year 25% or more in value of the outstanding stock of the corporation is owned, directly or indirectly, by or for the individual who has performed, is to perform, or may be designated (by name or by description) as the one to perform, such services.

**Line 1i.** For tax years beginning after December 31, 2004, in the case of any sale by a CFC of an interest in a partnership with respect to which the CFC is a 25% owner (defined below), such CFC is treated for purposes of computing its foreign personal holding company income as selling the proportionate share of the assets of the partnership attributable to such interest. Thus, the sale of a partnership interest by a CFC that meets the ownership threshold constitutes subpart F income only to the extent that a proportionate sale of the underlying partnership assets attributable to the

partnership interest would constitute subpart F income. Do not report these amounts on line 1b. Instead, report them on line 1i.

**25% owner.** For purposes of these rules, a 25% shareholder is a CFC that owns directly 25% or more of the capital or profits interest in a partnership. For purposes of the preceding sentence, if a CFC is a shareholder or partner of a corporation or partnership, the CFC is treated as owning directly its proportionate share of any such capital or profits interest held directly or indirectly by such corporation or partnership. If a CFC is treated as owning a capital or profits interest in a partnership under constructive ownership rules similar to the rules of section 958(b), the CFC shall be treated as owning such interest directly or indirectly for purposes of this definition.

**Line 10. De minimis rule.** If the sum of foreign base company income (determined without regard to section 954(b)(5)) and gross insurance income (as defined in section 954(b)(3)(C)) for the tax year is **less than** the smaller of 5% of gross income for income tax purposes, or \$1 million, then no portion of the gross income for the tax year is treated as foreign base company income or insurance income. In this case, enter zero on line 10 and skip lines 11 through 19. Otherwise, go to line 11.

**Line 11. Full inclusion rule.** If the sum of foreign base company income (determined without regard to section 954(b)(5)) and gross insurance income for the tax year exceeds 70% of gross income for income tax purposes, the entire gross income for the tax year must (subject to the high tax exception described below, the section 952(b) exclusion, and the deductions to be taken into account under section 954(b)(5)) be treated as foreign base company income or insurance income, whichever is appropriate. In this case, enter total gross income (for income tax purposes) on line 11. Otherwise, enter zero.

**Lines 13g, 14d, 15d, 16d, 18d, and 19d. Exception for certain income subject to high foreign taxes.** Foreign base company income and insurance income does not include any item of income received by a CFC if the taxpayer establishes that such income was subject to an effective rate of income tax imposed by a foreign country that is greater than 90% of the maximum rate of tax specified in section 11. For more information, see section 954(b)(4) and Regulations section 1.954-1(d)(1).

**Line 18. Adjusted net insurance income.** In determining a shareholder's pro rata share of the subpart F income of a CFC, insurance income is any income:

- That is attributable to the issuing (or reinsuring) of any insurance or annuity contract:

1. For property in, liability from an activity in, or for the lives or health of residents of a country other than the country under the laws of which the CFC is created or organized; or

2. For risks not described in 1 above, resulting from any arrangement in which another corporation receives a substantially equal amount of premiums or other consideration for issuing (or reinsuring) a contract described in 1 above.

- That would, subject to the modifications provided in sections 953(b)(1) and 953(b)(2), be taxed under subchapter L (insurance company tax) if such income were income of a domestic insurance company.

**Line 19. Adjusted net related person insurance income.** In determining a shareholder's pro rata share of the subpart F income of a CFC, related person insurance income is any insurance income (within the meaning of section 953(a)) attributable to a policy of insurance or reinsurance for which the person insured (directly or indirectly) is a U.S. shareholder (as defined in section 953(c)(1)(A)) in a CFC, or a related person (as defined in section 953(c)(6)) to such a shareholder. In such case, the pro rata share referred to above is to be determined under the rules of section 953(c)(5).

**Exceptions.** The above definition does not apply to any foreign corporation if:

- At all times during the foreign corporation's tax year, less than 20% of the total combined voting power of all classes of stock of the corporation entitled to vote, and less than 20% of the total value of the corporation, is owned (directly or indirectly under the principles of section 883(c)(4)) by persons who are (directly or indirectly) insured under any policy of insurance or reinsurance issued by the corporation or who are related persons to any such person;
- The related person insurance income (determined on a gross basis) of the corporation for the tax year is less than 20% of its insurance income for the tax year determined without regard to the provisions of section 953(a)(1) that limit insurance income to income from countries other than the country in which the corporation was created or organized; or

- The corporation:

1. Elects to treat its related person insurance income for the tax year as

income effectively connected with the conduct of a trade or business in the United States;

2. Elects to waive all treaty benefits (other than from section 884) for related person insurance income; and

3. Meets any requirement the IRS may prescribe to ensure that any tax on such income is paid.

This election will not be effective if the corporation was a disqualified corporation (as defined in section 953(c)(3)(E)) for the tax year for which the election was made or for any prior tax year beginning after 1986. See section 953(c)(3)(D) for special rules for this election.

**Mutual life insurance companies.** The related person insurance income rules also apply to mutual life insurance companies under regulations prescribed by the Secretary. For these purposes, policyholders must be treated as shareholders.

**Line 20. International boycott income.** If a CFC or a member of a controlled group (within the meaning of section 993(a)(3)) that includes the CFC has operations in, or related to, a country (or with the government, a company, or a national of a country) that requires participation in or cooperation with an international boycott as a condition of doing business within such country or with the government, company, or national of that country, a portion of the CFC's income is included in subpart F income. The amount included is determined by multiplying the CFC's income (other than income included under section 951 and U.S. source effectively connected business income described in section 952(b)) by the international boycott factor. This factor is a fraction determined on Schedule A (Form 5713).

**Special rule.** If the shareholder of a CFC can clearly demonstrate that the income earned for the tax year is from specific operations, then, instead of applying the international boycott factor, the addition to subpart F income is the amount specifically from the operations in which there was participation in or cooperation with an international boycott. See Schedule B (Form 5713).

**Line 21. Illegal bribes, kickbacks, and other payments.** Enter the total of any illegal bribes, kickbacks, or other payments (within the meaning of section 162(c)) paid by or on behalf of the corporation, directly or indirectly, to an official, employee, or agent of a government.

**Line 22. Income described in section 952(a)(5).** The income of a CFC derived from any foreign country during any period during which section 901(j) applies to such foreign country will be deemed to be income to the U.S. shareholders of such CFC. As of the date these instructions were revised, section 901(j) applied to: Iran, North Korea, Sudan, and Syria.

**Note.** Prior to December 22, 2015, section 901(j) applied to Cuba. Revenue Ruling 2016-8 provides that as of December 22, 2015, section 901(j) no longer applies to Cuba.

**Lines 24, 27, 30, and 33. Exclusion of U.S. income.** Subpart F income does not include any U.S. source income (which, for these purposes, includes all carrying charges and all interest, dividends, royalties, and other investment income received or accrued by a FSC) that is effectively connected with a CFC's conduct of a trade or business in the United States unless that item is exempt from taxation (or is subject to a reduced rate of tax) pursuant to a treaty obligation of the United States or the Code.

**Line 37. Current E&P limitation.** A CFC's subpart F income is limited to the sum of the following.

- Its current year E&P, computed under the special rule of section 952(c)(1). Enter this amount on line 37a.
- Any tested loss under section 951A(c)(2)(B)(ii). If the total of all lines 6 of all separate Schedules I-1 (Form 5471) for the CFC is a negative number, enter the amount as a positive number on line 37b. If the total of all lines 6 is a positive number or zero, enter -0- on line 37b.

The amount included in the gross income of a U.S. shareholder of a CFC under section 951(a)(1)(A)(i) for any tax year and attributable to a qualified activity must be reduced by the shareholder's pro rata share of any qualified deficit (see section 952(c)(1)(B)).

**Lines 39 through 43.** If Worksheet A, line 37c is less than the amount on Worksheet A, line 36, allocate the subpart F income remaining (after having been limited) (that is, the line 38 amount) to the four categories of subpart F income listed on Worksheet A, lines 40 through 43 using the rules of Regulations section 1.952-1(e).

**Worksheet B**

**U.S. Shareholder's Pro Rata Share of Earnings of a CFC Invested in U.S. Property**

Enter the amounts on lines 1 through 16 in functional currency.

<b>1</b>	Amount of U.S. property (as defined in sections 956(c) and (d)) held (directly or indirectly) by the CFC as of the close of:		
<b>a</b>	The first quarter of the tax year . . . . .	<b>1a</b>	
<b>b</b>	The second quarter of the tax year . . . . .	<b>1b</b>	
<b>c</b>	The third quarter of the tax year . . . . .	<b>1c</b>	
<b>d</b>	The fourth quarter of the tax year . . . . .	<b>1d</b>	
<b>2</b>	Number of quarter-ends the foreign corporation was a CFC during the tax year . . . . .		<b>2</b>
<b>3</b>	Average amount of U.S. property held (directly or indirectly) by the CFC as of the close of each quarter of the tax year. (Add lines 1a through 1d. Divide this amount by the number on line 2.)		<b>3</b>
<b>4</b>	U.S. shareholder's pro rata share of the amount on line 3 . . . . .		<b>4</b>
<b>5</b>	Earnings and profits described in section 959(c)(1)(A) with respect to the U.S. shareholder after reductions (if any) for current year distributions that affect the U.S. shareholder's section 959(c)(1) E&P account . . . . .		<b>5</b>
<b>6</b>	<b>Section 956(a)(1) amount.</b> Subtract line 5 from line 4 . . . . .		<b>6</b>
<b>7</b>	Applicable earnings:		
<b>a</b>	Current year earnings and profits . . . . .	<b>7a</b>	
<b>b</b>	Line 7a plus accumulated earnings and profits. . . . .	<b>7b</b>	
<b>8</b>	Enter the greater of line 7a or line 7b . . . . .		<b>8</b>
<b>9</b>	Distributions made by the CFC during the tax year . . . . .		<b>9</b>
<b>10</b>	Subtract line 9 from line 8 . . . . .		<b>10</b>
<b>11</b>	Earnings and profits described in section 959(c)(1) . . . . .		<b>11</b>
<b>12</b>	<b>Applicable earnings.</b> Subtract line 11 from line 10 . . . . .		<b>12</b>
<b>13</b>	<b>Section 956(a)(2) amount.</b> U.S. shareholder's pro rata share of the amount on line 12 . . . . .		<b>13</b>
<b>14</b>	<b>Section 956(a) amount.</b> Enter the smaller of line 6 or line 13. . . . .		<b>14</b>
<b>15</b>	Amount of E&P described in section 959(a)(2) with respect to the U.S. shareholder . . . . .		<b>15</b>
<b>16</b>	<b>Section 956 Inclusion.</b> Subtract line 15 from line 14 . . . . .		<b>16</b>
<b>17</b>	Translate the amount on line 16 from functional currency to U.S. dollars at the year-end spot rate (as provided in section 989(b)). Enter the result here and on line 2 of Schedule I . . . . .		<b>17</b>

**Worksheet B Instructions**

Use Worksheet B to determine a U.S. shareholder's pro rata share of earnings of a CFC invested in U.S. property that is subject to tax. Only earnings of a CFC not distributed or otherwise previously taxed are subject to these rules. Thus, the amount of previously **untaxed** earnings limits the section 956 inclusion. A CFC's investment in U.S. property in excess of this limit will not be included in the taxable income of the CFC's U.S. shareholders. The balances in the previously taxed accounts of prior section 956 inclusions (see section 959(c)(1)(A)) and current or prior subpart F inclusions (see section 959(c)(2)) reduce what would otherwise be the current section 956 inclusion.

**Note.** The previously taxed accounts should be adjusted to reflect any reclassification of subpart F inclusions that reduced prior section 956 or 956A inclusions (see section 959(a)(2) and Schedule J).

Distributions also are taken into account before the section 956 inclusion is determined. Distributions generally are treated as coming first from (and thus reducing the balances of) the previously

taxed accounts. Thus, the U.S. shareholders must:

1. Compute the current subpart F inclusion (potentially increasing that previously taxed account),
2. Take into account current distributions (potentially reducing the previously taxed and untaxed accounts), and
3. Compute the current section 956 inclusion (potentially increasing or reclassifying the previously taxed accounts).

**U.S. property** is measured on a quarterly average basis. For purposes of Worksheet B, the amount taken into account with respect to U.S. property generally is its adjusted basis for E&P purposes, reduced by any liability to which the property is subject. See sections 956(c) and (d) and the regulations under section 956 to determine whether the CFC is treated as holding U.S. property. The amount of U.S. property held (directly or indirectly) by the CFC does not include any item that was acquired by the foreign corporation before it became a CFC, except for the property acquired before the foreign corporation became a CFC that exceeds the applicable earnings (as

defined in section 956(b)) accumulated during periods before it became a CFC.

If the foreign corporation **ceases to be a CFC** during the tax year:

- The determination of the U.S. shareholder's pro rata share will be made based upon the stock owned (within the meaning of section 958(a)) by the U.S. shareholder on the last day during the tax year in which the foreign corporation was a CFC;
- The CFC's U.S. property for the tax year will be determined only by taking into account quarters ending on or before such last day (and investments in U.S. property as of the close of subsequent quarters should be recorded as zero on line 1); and
- In determining applicable earnings, current E&P will include only E&P that are allocable (on a pro rata basis) to the part of the year during which the foreign corporation was a CFC.

**Instructions for Separate Schedules**

**Schedule E**

Use Schedule E to report taxes paid or accrued by a foreign corporation for which

a foreign tax credit is allowed and taxes for which a credit may not be taken.

Several of the foreign tax credit provisions of the Act are applicable in tax years of foreign corporations beginning after December 31, 2017, and to tax years of U.S. shareholders in which or with which such tax years of the foreign corporations end (“post-2017 foreign corporate tax year”). As such, if the foreign corporation’s year begins before 2018 (“pre-2018 foreign corporate tax year”), some pre-enactment rules continue to apply in the domestic corporation’s tax year beginning in 2019 if such domestic corporation owns the foreign corporation through certain pass-through entities. For example, if a domestic corporation with a tax year ending September 30, 2020 owns a domestic partnership with a tax year ending October 31, 2019 and the domestic partnership owns a foreign corporation with a U.S. tax year beginning on December 1, 2017, and ending on November 30, 2018, for its 2019 tax year such domestic corporation is subject to certain pre-enactment provisions with respect to such foreign corporation. However, if such domestic corporation also owns a foreign corporation with a U.S. tax year beginning on January 1, 2019, and ending on December 31, 2019, for its 2019 tax year such domestic corporation is subject to certain post-enactment provisions with respect to such foreign corporation. Therefore, the Form 5471 continues to require reporting under pre-enactment provisions, as well as requiring new reporting for post-enactment provisions.

**Name of person filing Form 5471.** The name of the person filing Form 5471 is generally the name of the U.S. person described in the applicable category or categories of filers (see [Categories of Filers](#), earlier). However, in the case of a consolidated return, enter the name of the U.S. parent in the field for “Name of person filing Form 5471.”

**Reference ID number.** If applicable, use the reference ID number shown on Form 5471, page 1, Item 1b(2).

**Lines a and b.** Complete a separate Schedule E for each applicable separate category of income. Enter the appropriate code on line a (above Part I). To determine the appropriate code, see *Categories of Income* in the Instructions for Form 1118, Foreign Tax Credit—Corporations. A foreign corporation may need to report taxes with respect to all categories of income listed in the Instructions for Form 1118, with the exception of foreign branch category income. A foreign corporation may accrue or pay taxes properly attributable to an income group within the general category, passive category, or section 901(j)

category. See Regulations section 1.960-1(d)(2)(ii). A foreign corporation may accrue or pay taxes properly attributable to a PTEP group within any of the separate categories of income, with the exception of foreign branch category income. See Regulations section 1.960-3(c)(1).

If code 901j is entered on line a, enter on line b the country code for the sanctioned country using the two-letter codes (from the list at [IRS.gov/countrycodes](#)).

### Part I—Taxes for Which a Foreign Tax Credit Is Allowed

List income, war profits, and excess profits taxes (income taxes) paid or accrued to each foreign country or U.S. possession for the foreign corporation’s foreign tax year(s) that end with or within its U.S. tax year. With respect to dividends paid in tax years of foreign corporations beginning before January 1, 2018, the taxes reported on this schedule include taxes deemed paid with respect to a dividend from a lower-tier foreign corporation. See section 902 before its repeal by the Act.

**Amounts not reported in Part I.** Do not report taxes that are not creditable, including taxes for which a credit is disallowed under section 901(j), (k), (l), or (m). Such taxes are reported in Part III. Also, do not report taxes suspended and unsuspended under the anti-splitter rules and taxes associated with hovering deficits on Schedule E. Such taxes are reported on Schedule E-1 (Form 5471).

**Adjustments to foreign income taxes.** Adjustments to foreign income taxes paid or accrued in a prior year should not be reflected on Schedule E in the year of adjustment. Instead, they should be reported in the year to which such taxes relate. This may require an amended return. See section 905(c), as amended by the Act. Adjustments include additional payments, refunds, and downward adjustments for accrued foreign taxes that are not paid within 2 years after the close of the tax year to which such taxes relate.

### Comparison to income tax expense reported on Schedule C (Form 5471).

The foreign income taxes reported on Schedule E may differ from the amount reported as income tax expense on line 21a of Schedule C. This is due in part to differences in the accounting for foreign tax redeterminations, disallowed taxes, and foreign income taxes reported in Other Comprehensive Income for U.S. GAAP purposes.

### Comparison to income tax expense reported on Schedule H (Form 5471).

The foreign income taxes reported on Schedule E may differ from the taxes deducted on line 2g of Schedule H. For

example, disallowed taxes reported in Part III of Schedule E are taken into account in E&P but are not creditable foreign income taxes.

### Column (a)

Amounts reported on Schedule E may include taxes paid or accrued by the foreign corporation or a pass-through entity (for example, partnership or disregarded entity) owned by the foreign corporation. If the tax is paid or accrued by the pass-through entity, enter the name of such entity instead of the name of the foreign corporation. If the tax paid or accrued by the foreign corporation is attributable to a branch or qualified business unit (QBU) of the foreign corporation, enter the name of the branch or QBU.

With respect to deemed paid taxes related to dividends received from lower-tier foreign corporations in tax years of foreign corporations beginning before January 1, 2018, column (a) should include the name of the lower-tier foreign corporation that paid the dividend instead of the recipient foreign corporation.

With respect to deemed paid taxes related to PTEP distributions received from lower-tier foreign corporations in tax years of foreign corporations beginning before January 1, 2018, column (a) should include the name of the lower-tier foreign corporation that made the PTEP distribution instead of the recipient foreign corporation.

### Column (b)

Enter the employer identification number (EIN) or reference ID number of the payor entity listed in column (a). A reference ID number is required only in cases in which no EIN was entered for the foreign corporation or pass-through entity owned by the foreign corporation. Filers are permitted to enter both an EIN and a reference ID number.

### Column (c)

Enter the two-letter codes (from the list at [IRS.gov/countrycodes](#)) of all foreign countries and U.S. possessions to which taxes were paid or accrued. If taxes were paid or accrued to more than one country with respect to the same income, include each tax paid or accrued to a different country on separate lines.

### Column (d)

The foreign tax year under foreign tax law may not be the same tax year as the U.S. tax year of the foreign corporation. If the tax is attributable to a pass-through entity owned by a foreign corporation, the foreign tax year of the foreign corporation within which such pass-through entity’s year ends should be reported on this line.

## Column (f)

Enter the income reported to the foreign tax authority under foreign tax law. This should be the foreign taxable income base for determining the tax reported in column (g).

## Column (g)

Enter the tax paid or accrued in the local currency in which tax is payable and not the functional currency of the payor or foreign corporation. See sections 986(a) and 905(c).

## Columns (h) and (i)

Enter the exchange rate in column (h) and the translated dollar amount in column (i).

Translate the taxes entered in column (g) into dollars at the average exchange rate for the tax year to which the tax relates unless one of the exceptions below applies. See section 986(a).

**Exceptions.** If one of the following exceptions applies, use the exchange rate in effect on the date the foreign corporation paid the tax.

1. The tax is paid before the beginning of the year to which the tax relates.
2. Accrued taxes are not paid before the date two years after the close of the tax year to which such taxes relate.
3. There is an election in effect under section 986(a)(1)(D) to translate foreign taxes using the exchange rate in effect on the date of payment.
4. The foreign corporation reports on the cash basis. See section 986(a).
5. The foreign tax is denominated in an inflationary currency. See section 986(a)(1)(C).

Report the exchange rate using the "divide-by convention" specified under [Reporting exchange rates on Form 5471](#), earlier.

## Column (j)

Enter the tax in functional currency. E&P takes into account foreign income taxes paid or accrued by the foreign corporation. The foreign corporation's E&P is determined in the foreign corporation's functional currency. See section 986(b).

## Line 8

Report the total of the amounts listed in column (i) on this line 8. This total also should be reported on Schedule E-1, line 4.

## Line 9

Report the total of the amounts listed in column (j) on this line 9. This total and the amount reported on line 3 of Schedule E, Part III, are the appropriate reduction to current year E&P. See Schedule H, line 2g.

**Example.** CFC1, a foreign corporation, with reference ID number 1000123, pays or accrues tax of 10u = \$10 to Country X on 50u of Country X taxable income with respect to CFC1's foreign tax year ending December 31, 2019. CFC1 has a December 31 tax year end for both foreign and U.S. tax purposes. Also, CFC1 receives in the tax year ending December 31, 2019, a refund of 3u from Country X on 15u of income with respect to CFC1's tax year ending December 31, 2016, translated to equal \$5, and on which the original liability was \$7. Therefore, the revised tax liability is \$2. All taxes relate to general category income. Also assume for both years that the local currency in which the tax was paid was the same as the foreign corporation's functional currency. The country code for Country X is XX.

The following entries should be made on the 2019 Form 5471, Schedule E, Part I, for CFC1.

- Line 1, column (a): CFC1
- Line 1, column (b): 1000123
- Line 1, column (c): XX
- Line 1, column (d): 2019/12/31
- Line 1, column (e): 2019/12/31
- Line 1, column (f): 50u
- Line 1, column (g): 10u
- Line 1, column (h): 1.0000
- Line 1, column (i): \$10
- Line 1, column (j): 10u

An amended 2016 tax return should be filed by or for the U.S. person(s) with respect to which Form 5471 was required and that return should include an amended Form 5471. The amended Form 5471 should include an attachment with a schedule that looks like the current version of Schedule E, Part I, with the following entries.

- Line 1, column (a): CFC1
- Line 1, column (b): 1000123
- Line 1, column (c): XX
- Line 1, column (d): 2016/12/31
- Line 1, column (e): 2016/12/31
- Line 1, column (f): 15u
- Line 1, column (g): 1.20u
- Line 1, column (h): 1.6667
- Line 1, column (i): \$2
- Line 1, column (j): 1.20u

## Part III—Taxes for Which Foreign Tax Credit Is Disallowed

Use Part III to report taxes for which foreign tax credits are not allowed. While not allowed as a credit, such taxes are taken into account in determining the foreign corporation's E&P.

Do not enter taxes that do not meet the criteria under Regulations section 1.901-2.

Do not enter foreign income taxes that have been suspended under the anti-splitter rules under section 909 or the

hovering deficit rules under Regulations section 1.367(b)-7. Such taxes are reported on Schedule E-1.

## Columns (a) and (b)

See [Part I Taxes for Which a Foreign Tax Credit Is Allowed](#) for instructions regarding these columns.

## Column (c)

Enter foreign income taxes that are disallowed under section 901(j), generally foreign income taxes paid or accrued to certain sanctioned countries.

## Column (d)

Enter foreign income taxes that are disallowed under section 901(k), which generally applies to certain taxes paid on dividends if the minimum holding period is not met with respect to the underlying stock, or if the corporation is obligated to make related payments with respect to positions in similar or related property. Also enter foreign income taxes disallowed under section 901(l), which generally applies to certain taxes paid on gain and income other than dividends if the minimum holding period is not met with respect to the underlying property, or if the corporation is obligated to make related payments with respect to positions in similar or related property.

## Column (e)

In the case of a covered asset acquisition (as defined in section 901(m)(2)), enter the disqualified portion of any tax determined with respect to the income or gain attributable to the relevant foreign assets (section 901(m)).

**Note.** This rule generally applies to covered asset acquisitions after December 31, 2010. See Temporary and Proposed Regulations sections 1.901(m)-1 through 1.901(m)-8 for additional information. Note that the rules contained in these regulations have later effective dates.

## Column (f)

Enter the amount of taxes paid or accrued by the foreign corporation to the United States. No credit is allowed for these taxes because only foreign income taxes paid or accrued to a foreign country or possession of the United States are allowed as a credit. See section 901(b).

## Column (g)

Enter taxes for which a foreign tax credit is disallowed other than those detailed in columns (c) through (f). Such taxes may include, but are not limited to, certain taxes on the purchase or sale of oil and gas (section 901(f)), certain taxes used to provide subsidies (section 901(i)), and taxes for which no credit is allowed because of the boycott provisions of

section 908. Taxes reported in column (g) also include any taxes related to the residual income group. See Regulations section 1.960-1(d)(2)(ii)(D).

**Example.** CFC1, a foreign corporation, wholly owns the only class of stock of CFC2, a foreign corporation. CFC2 does not have PTEP. CFC2 distributes section 959(c)(3) E&P to CFC1 which is treated as a dividend for U.S. tax purposes. For foreign tax purposes, the distribution is also characterized as a dividend. As CFC1 and CFC2 are located in different countries, a withholding tax is levied by CFC2's country of residence on the distribution. Under the principles of Regulations section 1.904-6, the distribution is assigned to the statutory or residual grouping to which the corresponding U.S. item is assigned. In this case the corresponding U.S. item is section 959(c)(3) E&P, which is in the residual income group. See Regulations section 1.960-1(d)(2)(ii)(D). Therefore, the withholding taxes are properly attributable to the residual income group. Under Regulations section 1.960-1(e), such taxes are not deemed paid for any taxable year and therefore are reported in column (g).

### Column (h)

For each line in this column, enter the total amount for each payor in columns (c) through (g).

### Line 3

Total each amount in column (h) and enter on line 3. All amounts should be in functional currency.

### Line 4

Translate the line 3 amount from functional currency to U.S. dollars using, in general, the average exchange rate as defined by section 989(b)(3).

## Schedule E-1

Use Schedule E-1 to report the cumulative balance of foreign income taxes paid or accrued by a CFC by separate category of income. Also use this schedule to report the foreign income taxes paid or accrued by specified foreign corporations that are only treated as CFCs for limited purposes under section 965(e)(2).

Enter amounts in U.S. dollars unless otherwise noted.

### Columns (a), (b), and (c)

Report the opening balance, current year additions and subtractions, and the closing balance of the foreign corporation's foreign income taxes paid or accrued with respect to E&P described in section 959(c)(3). In general, this is E&P of the foreign corporation that has not been included in gross income of a U.S.

person under sections 951(a)(1) and 951A.

In column (a), report foreign income taxes paid or accrued with respect to current E&P and earned after the repeal of section 902, that is, post-2017 E&P not previously taxed (post-2017 section 959(c)(3) balance). Only include information with respect to the current tax year of the foreign corporation. Do not include foreign income taxes paid or accrued by the foreign corporation in its other tax years beginning after December 31, 2017 or that do not relate to the current tax year. Therefore, in column (a), no amount should be reported on lines 1a through 1c, line 2, and line 14. The repeal of section 902 is effective for tax years of foreign corporations beginning after December 31, 2017, and to tax years of U.S. shareholders in which or with which such tax years of foreign corporations end (post-2017 foreign corporate tax years).

In column (b), report post-1986 foreign income taxes, as defined in section 902(c)(2), and as in effect prior to the repeal of section 902.

In column (c), report the aggregate amount of the foreign corporation's foreign income taxes paid or accrued with respect to pre-1987 section 964(a) E&P accumulated since 1962 and not previously distributed or deemed distributed.

### Column (d)

Use column (d) to report taxes related to hovering deficits and taxes suspended under section 909.

### Columns (e)(i) through (e)(xvi)

Report foreign income taxes paid or accrued with respect to E&P described in sections 959(c)(1) and (c)(2) (previously taxed E&P).

### Specific Instructions Related to Lines 1 through 12

**Line 1a.** This amount should equal the amount that was reported as the balance at the beginning of the next year on line 14 of the prior year Schedule E-1. No amount should be reported in column (a).

**Line 1b.** If the balance on line 14 of the prior year Schedule E-1 was adjusted after the filing of the original prior year Form 5471, such adjustments should be reflected on line 1b. For example, if there were errors in the original computation of foreign income taxes, an adjustment would be included in this line. See [Corrections to Form 5471](#), earlier. Do not include any adjustments required to be reported on line 6 or 12. No amount should be reported in column (a).

**Line 2.** Use line 2 to reflect adjustments to a U.S. person's foreign tax credit as a result of redetermined foreign income taxes. If a U.S. person has appropriately amended the immediately prior year return, including its Schedule E-1, to redetermine its U.S. tax liability, no adjustment should be included on this line. This line is only applicable if a U.S. person appropriately amended a prior year return and there were intervening years between the amended year return and the current year return for which an amended return was not filed. If so, an adjustment for the prior year amended return (and its impact on intervening years) should be reflected on line 2. No amount should be reported in column (a).

**Line 3a.** Include in column (a), (b), (c), or (e) foreign income taxes paid or accrued by the corporation during prior tax years that were suspended due to the application of the rules of section 909 and that are unsuspended in the current year because related income is taken into account by the foreign corporation, certain U.S. corporate owners of the foreign corporation, or a member of such U.S. corporate owner's consolidated group. This amount is reported as a positive amount on line 3a, column (a), (b), (c), or (e), and as a negative amount in column (d). See Regulations section 1.909-1(d) with respect to the application of section 909 to pre-1987 E&P not previously taxed and income taxes.

**Line 3b.** Include as a positive amount in column (d) foreign income taxes related to the current tax year that have been suspended due to the rules of section 909.

**Line 4.** The total reported on Schedule E, column (i), line 8, should be separated into columns (a) through (e) according to the type of E&P to which such taxes relate.

**Example 1.** Domestic Corporation, a U.S. shareholder, wholly owns the only class of stock of CFC1, a foreign corporation. CFC1, in turn, wholly owns the only class of stock of CFC2, a foreign corporation. CFC2, in turn, wholly owns the only class of stock of CFC3, a foreign corporation. The functional currency of Domestic Corporation, CFC1, CFC2, and CFC3 is the U.S. dollar. During Year 1, Domestic Corporation reports an inclusion under section 951(a)(1) of \$100 as a result of subpart F income of CFC3. During Year 2, CFC3 distributes \$40 to CFC2. CFC2 pays withholding tax of \$4 on the distribution from CFC3. Such tax is a tax related to previously taxed subpart F income and is reported on line 4, column (e)(xvi), of Schedule E-1 of CFC2's Form 5471.

**Example 2.** The facts are the same as in Example 1, except that, in addition, CFC2 distributes \$36 to CFC1 in Year 3.



CFC1 is deemed to pay the \$4 of withholding tax paid by CFC2 in Year 2. See section 960(b). Such tax is related to previously taxed subpart F income and is reported on line 4, column (e)(xvi), of Schedule E-1 of CFC1's Form 5471. Such tax is also reported as a negative number on line 10, column (e)(xvi), of Schedule E-1 of CFC2's Form 5471.

**Line 5a.** Report taxes carried over to a foreign surviving corporation after an acquisition by a foreign corporation of the assets of another foreign corporation in a transaction described in section 381. See Regulations section 1.367(b)-7(b)(1) and (d)(1). See Regulations section 1.367(b)-7(e)(1) with respect to foreign income taxes related to pre-1987 E&P not previously taxed.

**Line 5b.** Post-1986 foreign income taxes that are related to a hovering deficit in a separate category of post-1986 undistributed earnings should only be added to the foreign surviving corporation's post-1986 foreign income taxes in that separate category on a pro rata basis as the hovering deficit is absorbed. See Regulations section 1.367(b)-7(d)(2)(iii). An amount equal to the taxes related to a hovering deficit that are reported in column [(a)], (b), or (c) of line 5a is included as a negative amount on line 5b of column [(a)], (b), or (c), respectively. An amount equal to the total taxes related to hovering deficits reported on line 5b of columns [(a)], (b), and (c) is included as a positive number in column (d) of line 5b.

**Line 6.** Attach a statement with a description and the amount of any adjustments required before taking into account taxes deemed paid by the foreign corporation. Do not include any adjustments required to be reported on line 1b or 12. An example of an adjustment entered on line 6 is the foreign taxes imposed on receipt of a distribution of PTEP from a lower-tier foreign corporation.

**Line 7, column (b).** Report post-1986 foreign income taxes used for purposes of determining the taxes deemed paid on dividends from a foreign corporation in such corporation's tax years beginning before January 1, 2018 (pre-2018 foreign corporate tax years). See section 902(c)(2).

**Line 8.** A domestic corporation is deemed to pay foreign income taxes attributable to inclusions under section 951(a)(1). See section 960(a)(1) (for pre-2018 foreign corporate tax years) and section 960(a) (for post-2017 foreign corporate tax years). If a domestic corporation computes deemed paid taxes under both sections 902 and 960 in the same tax year, section 960 is applied first.

See section 960(a)(2) and Regulations section 1.960-1(i)(2) (for pre-2018 foreign corporate tax years). Amounts reported on line 8 should be negative numbers.

**Line 9.** If a domestic corporation includes an amount in income under section 951A, such domestic corporation is deemed to pay foreign income taxes equal to 80% of the product of: (a) such domestic corporation's inclusion percentage, multiplied by (b) the aggregate tested foreign income taxes paid or accrued by the CFC. For the computation of such amount, see Form 1118, Schedule D. Amounts reported on line 9 should be negative numbers.

**Line 10.** A domestic corporation is deemed to pay foreign income taxes with respect to distributions of post-1986 undistributed earnings from certain foreign corporations in pre-2018 foreign corporate tax years. Include on line 10 all taxes attributable to distributions of E&P regardless of whether the shareholder receiving the distribution is eligible for a deemed paid credit or whether the shareholder is required to file Form 5471. In addition, a domestic corporation is deemed to pay foreign income taxes with respect to distributions of previously taxed E&P. See section 960(a)(3) for pre-2018 foreign corporate tax years and section 960(b) for post-2017 foreign corporate tax years. Amounts reported on line 10 should be negative numbers.

**Example 3.** The facts are the same as in *Example 2*, except that during Year 4, CFC1 distributes \$36 to Domestic Corporation. Domestic Corporation is deemed to pay the \$4 of withholding taxes deemed paid by CFC1 in Year 3 and paid by CFC2 in Year 2. A negative \$4 will be recorded on line 10, column (e)(xvi).

**Line 11.** Foreign income taxes reclassified from section 959(c)(2) previously taxed E&P to section 959(c)(1) previously taxed E&P should be reported as negative numbers in columns (e)(x) through (e)(xvi) and as positive numbers in columns (e)(i) through (e)(viii).

**Example 4.** The facts are the same as in *Example 1*, except that during Year 2 CFC2 invests \$40 in U.S. property. At the time of investment in such property, CFC2 continues to maintain a \$36 balance in its section 959(c)(2) previously taxed E&P account. CFC2 reclassifies such amount as section 959(c)(1) previously taxed E&P on Schedule J. Accordingly, \$4 of foreign income taxes related to section 959(c)(2) previously taxed E&P is reclassified to section 959(c)(1) previously taxed E&P on line 11, column (e)(iii). A negative \$4 will be recorded on line 11, column (e)(xvi), and a positive \$4 will be recorded on line 11, column (e)(iii).

**Line 12.** Attach a statement with a description and the amount of any required adjustments to taxes of the foreign corporation not already taken into account on this schedule.

## Schedule H

Use Schedule H to report the foreign corporation's current E&P for U.S. tax purposes. Enter the amounts on lines 1 through 5c in the CFC's functional currency.

Certain filers may be able to use alternative information (as defined in section 3.01 of Rev. Proc. 2019-40) to determine certain amounts in this schedule. See Rev. Proc. 2019-40 for more details.

**Note.** Category 5 filers who are unrelated section 958(a) U.S. shareholders are not required to file Schedule H for foreign-controlled corporations. Category 5 filers who are related constructive U.S. shareholders are not required to file Schedule H for foreign-controlled corporations. See [Certain Category 1 and Category 5 Filers](#) under *Categories of Filers*.

**Name of person filing Form 5471.** The name of the person filing Form 5471 is generally the name of the U.S. person described in the applicable category or categories of filers (see [Categories of Filers](#), earlier). However, in the case of a consolidated return, enter the name of the U.S. parent in the field for "Name of person filing Form 5471."

**Lines a and b.** Complete a separate Schedule H for each applicable separate category of income. Schedule H may include E&P with respect to the general category, passive category, or section 901(j) category. See Regulations section 1.960-1(d)(2)(ii). The code for general category income is GEN, the code for passive category income is PAS, and the code for the section 901(j) category is 901j.

If code 901j is entered on line a, enter on line b the country code for the sanctioned country using the two-letter codes (from the list at [IRS.gov/countrycodes](https://www.irs.gov/countrycodes)).

**Note.** For purposes of this Schedule H, include in each separate category of income foreign and U.S. income.

**Reference ID number.** If applicable, use the reference ID number shown on Form 5471, page 1, Item 1b(2).

**Special rules for DASTM.** If the foreign corporation uses DASTM, enter on line 1 the dollar GAAP income or (loss) from line 22 of Schedule C. Enter on lines 2a through 4 the adjustments made in figuring current E&P for U.S. tax purposes.

Report these amounts in U.S. dollars. Enter on line 5b the DASTM gain or loss figured under Regulations section 1.985-3(d).

**Lines 2a through 2i.** Certain adjustments (required by Regulations sections 1.964-1(b) and (c)) must be made to the foreign corporation's line 1 net book income or (loss) to determine its current E&P. These adjustments may include both positive and negative adjustments to conform the foreign book income to U.S. GAAP and to U.S. tax accounting principles. If the foreign corporation's books are maintained in functional currency in accordance with U.S. GAAP, enter on line 1 the functional currency GAAP income or (loss) from line 21 of Schedule C, rather than starting with foreign book income, and show GAAP-to-tax adjustments on lines 2a through 2i.

**Lines 2b and 2c.** Generally, depreciation, depletion, and amortization allowances must be based on the historical cost of the underlying asset, and depreciation must be figured according to section 167. However, if 20% or more of the foreign corporation's gross income is from U.S. sources, depreciation must be figured on a straight line basis according to Regulations section 1.312-15.

**Line 2f.** Inventories must be taken into account according to the rules of sections 471 (incorporating the provisions of section 263A) and 472 and the related regulations.

**Line 2g.** See the instructions for [Schedule C, Line 20](#), earlier. Reflect differences between the income tax expense (benefit) reported for book purposes and the income taxes deducted or added to E&P. Such differences include, for example, deferred income tax expenses, uncertain tax positions, intraperiod allocations, adjustments made after closing the financial statements (post-closing adjustments) and not reflected in income tax expense (benefit), and the adjustment for a foreign tax redetermination that required a redetermination of the U.S. tax liability.

**Line 2h.** Enter the adjustment to foreign gains or losses. Attach a statement with a description of the gain or losses.

In the case of section 988 losses, determine whether Form 8886 needs to be completed as described in [Additional Filing Requirements](#), earlier.

**Line 2i.** Enter the net amount of any additional adjustments not included on lines 2a through 2h. List these additional adjustments on a separate statement. Attach this statement to Form 5471.

**Line 5b.** DASTM gain or (loss), reflecting unrealized exchange gain or loss, should

be entered on line 5b only for foreign corporations that use DASTM.

**Line 5d.** Enter the line 5c functional currency amount translated into U.S. dollars at the average exchange rate for the foreign corporation's tax year. See section 989(b). Report the exchange rate using the "divide-by convention" specified under [Reporting Exchange Rates on Form 5471](#), earlier. If the foreign corporation uses DASTM, enter on line 5d the same amount entered on line 5c.

**Blocked income.** The E&P of the foreign corporation, as reflected on Schedule H, must not be reduced by all or any part of such E&P that could not have been distributed by the foreign corporation due to currency or other restrictions or limitations imposed under the laws of any foreign country.

## Schedule I-1

This schedule is used to report information determined at the CFC level with respect to amounts used in the determination of income inclusions by U.S. shareholders under section 951A. The information in this schedule will be used by the U.S. shareholder(s) of the CFC to file Form 8992, U.S. Shareholder Calculation of Global Intangible Low-Taxed Income (GILTI), and may assist in the completion of Form 1118, Foreign Tax Credits—Corporations, or Form 1116, Foreign Tax Credit (Individual, Estate, or Trust), if applicable.

Enter the amounts on lines 1 through 10c in the CFC's functional currency. The functional currency amounts entered on lines 6 through 10c must be converted to U.S. dollars.

Certain filers may be able to use alternative information (as defined in section 3.01 of Rev. Proc. 2019-40) to determine certain amounts in this schedule. See Rev. Proc. 2019-40 for more details.

**Name of person filing Form 5471.** The name of the person filing Form 5471 is generally the name of the U.S. person described in the applicable category or categories of filers (see [Categories of Filers](#), earlier). However, in the case of a consolidated return, enter the name of the U.S. parent in the field for "Name of person filing Form 5471."

**Separate category.** Schedule I-1 is now completed once. (It is no longer completed separately for each applicable category of income.) Therefore, Schedule I-1 is completed once (for general category income, passive category income, or both). A Schedule I-1 that includes passive category income must include the code for passive category income (PAS) in the entry space for separate category (at the top of

Schedule I-1). A taxpayer with only general category income (and no passive category income), should enter the code "GEN" in the entry space for separate category.

**Note.** The other reporting requirements of a taxpayer that includes passive category income with general category income in a Schedule I-1 do not change because the taxpayer includes passive category income with general category income in a Schedule I-1. For example, the taxpayer may still be required to complete a Form 1116 or a Form 1118, and/or a Form 5471 (including Schedule J and Schedule P), and separately report passive category income and section 951A category income.

**Line 1.** Enter the CFC's gross income.

**Line 2a.** Enter the amount of the CFC's income described in section 952(b), which generally is income from sources within the United States that is effectively connected to the conduct of a trade or business by the CFC in the United States and not reduced or exempt from tax pursuant to an income tax treaty with the United States.

**Line 2b.** Enter the amount, if any, of the CFC's gross income taken into account in determining the CFC's subpart F income (as defined in section 952). Note that an amount determined under section 956(a) is not considered subpart F income. The amount to be entered is computed after application of the high-tax exception in section 954(b)(4), but before application of the E&P limitation in section 952(c)(1)(A).

**Line 2c.** Enter the amount, if any, of the CFC's gross income excluded from foreign base company income (as defined in section 954) and insurance income (as defined in section 953) by reason of section 954(b)(4), the high-tax exception.

**Line 2d.** Enter the amount of any dividend income received by the CFC from a related person as defined in section 954(d)(3). Do not include the amounts of any dividend income received from a related person that are already included in the amounts entered on line 2b or line 2c.

**Line 2e.** Enter the amount of the CFC's taxable income from sources outside the United States and its possessions from the following.

- The extraction (by the corporation or any other person) of minerals from oil or gas wells located outside the United States and its possessions.
- The sale or exchange of assets used (by the corporation) in the trade or business of extracting minerals from oil or gas wells located outside the United States and its possessions.

**Line 3.** Enter the sum of lines 2a through 2e.

**Line 4.** Subtract line 3 from line 1 and enter the result on line 4.

**Line 5.** Enter the deductions (including taxes) properly allocable to the amount on line 4 (or to which such deductions would be allocable if there were such gross income).

**Line 6.** Subtract line 5 from line 4 and enter the result on line 6. This amount must be converted from functional currency to U.S. dollars using the average exchange rate for the year of the CFC. See Regulations section 1.951A-1(d)(1).

Report the exchange rate using the “divide-by convention” specified under [Reporting exchange rates on Form 5471](#), earlier.

**Line 7.** If the CFC has a tested loss on line 6, enter zero. If the CFC has tested income on line 6, enter only those foreign income taxes that are properly attributable to the CFC’s tested income. This amount must be converted from functional currency to U.S. dollars using the average exchange rate for the year of the CFC. See section 986. The U.S. shareholder(s) will compute their pro rata share of the tested foreign taxes and enter that amount on Form 1118, Schedule D, Part I, column 5, if applicable.

**Line 8.** If the CFC has a tested loss on line 6, enter zero. If the CFC has tested income on line 6, enter the Qualified Business Asset Investment (QBAI) (defined below). This amount must be converted from functional currency to U.S. dollars using the average exchange rate for the year of the CFC. See Regulations section 1.951A-1(d)(1).

**Qualified business asset investment (QBAI).** QBAI is the average of the CFC’s aggregate adjusted bases, as of the close of each quarter of its taxable year, in specified tangible property used in its trade or business in the production of tested income, and for which a deduction is allowable under section 167. Adjusted basis in any property must be determined by using the alternative depreciation system under section 168(g) and allocating depreciation deductions with respect to such property ratably to each day during the period in the taxable year to which such depreciation relates.

**Specified tangible property and dual-use property.** Specified tangible property means any tangible property used in the production of tested income. If such property was used in the production of tested income and income that is not tested income (that is, dual-use property), the property is treated as specified tangible property in the same proportion

that the amount of tested income determined before allocable deductions (that is, line 4) produced with respect to the property bears to the total amount of gross income produced with respect to the property.

**Partnership property.** A CFC with tested income that is a partner of a partnership that has depreciable tangible property determines its share of the partnership’s average adjusted basis in the depreciable tangible property of the partnership based on the amount of the distributive share of the gross income produced by the property that is included in the CFC’s gross tested income (defined below) relative to the total amount of gross income produced by the property. The partnership’s average adjusted basis in the depreciable tangible property of the partnership generally is determined based on the average of the adjusted basis in the property as of the close of each quarter of the partnership’s taxable year that ends with or within the CFC’s taxable year. See Regulations section 1.951A-3(g).

**Gross tested income.** For these purposes, a CFC’s gross tested income is its gross income less total exclusions (Schedule I-1, line 4).

**Lines 9a through 9d.** In general, see Regulations section 1.951A-4(b)(1) to determine how to compute the CFC’s tested interest expense.

**Line 9a.** Enter the amount of interest expense included on line 5. See the instructions for [Line 6](#) for foreign currency translation.

**Line 9b.** Enter the CFC’s qualified interest expense as defined in Regulations section 1.951A-4(b)(1)(iii).

**Line 9c.** Enter the CFC’s tested loss QBAI amount as defined in Regulations section 1.951A-4(b)(1)(iv).

**Line 9d.** Subtract the sum of line 9b and line 9c from line 9a and enter the result on line 9d.

**Lines 10a through 10c.** In general, see Regulations section 1.951A-4(b)(2) to determine how to compute the CFC’s tested interest income.

**Line 10a.** Enter the amount of interest income included on line 4. See the instructions for [Line 6](#) for foreign currency translation.

**Line 10b.** Enter the CFC’s qualified interest income as defined in Regulations section 1.951A-4(b)(2)(iii).

**Line 10c.** Subtract line 10b from line 10a and enter the result on line 10c.

## Schedule J

Use Schedule J to report a CFC’s accumulated E&P in its functional currency, computed under sections 964(a) and 986(b). Also use this schedule to report the E&P of specified foreign corporations that are only treated as CFCs for limited purposes under section 965(e) (2).

**Note.** Category 1 and 5 filers who are unrelated section 958(a) U.S. shareholders are not required to file Schedule J for foreign-controlled corporations. Category 1 and 5 filers who are related constructive U.S. shareholders are not required to file Schedule J for foreign-controlled corporations. See [Certain Category 1 and Category 5 Filers](#) under *Categories of Filers*.

**Name of person filing Form 5471.** The name of the person filing Form 5471 is generally the name of the U.S. person described in the applicable category or categories of filers (see [Categories of Filers](#), earlier). However, in the case of a consolidated return, enter the name of the U.S. parent in the field for “Name of person filing Form 5471.”

**Reference ID number.** If applicable, use the reference ID number shown on Form 5471, page 1, Item 1b(2).

**Lines a and b.** Complete a separate Schedule J for each applicable separate category of income. Enter the appropriate code on line a (at the top of page 1 of Schedule J). To determine the appropriate code, see *Categories of Income* in the Instructions for Form 1118. A foreign corporation may need to report E&P with respect to all categories of income listed in the Instructions for Form 1118, with the exception of foreign branch category income. A foreign corporation may have E&P in an income group within the general category, passive category, or section 901(j) category. See Regulations section 1.960-1(d)(2)(ii). A foreign corporation may have PTEP in a PTEP group within any of the separate categories of income, with the exception of foreign branch category income. See Regulations section 1.960-3(c)(1).

If code 901j is entered on line a, enter on line b the country code for the sanctioned country using the two-letter codes (from the list at [IRS.gov/countrycodes](#)).

**Note.** For purposes of this Schedule J, include in each separate category of income foreign and U.S. income.

## Part I—Accumulated E&P of Controlled Foreign Corporation

Check the box at the top of Part I if the person filing Form 5471 does not have all

U.S. shareholders' information necessary to complete any one of the previously taxed E&P amounts required to be included in column (e). If the person filing Form 5471 is unable to determine whether amounts should be reported as previously taxed E&P, those amounts should be included in column (a), Post-2017 E&P Not Previously Taxed, section 959(c)(3) balance. For example, one U.S. shareholder might not know the other U.S. shareholder's section 951A inclusion with respect to a CFC because the first U.S. shareholder does not have information with respect to the second U.S. shareholder's tested loss for the CFC or QBAL. See the instructions for [Schedule P](#) for an example.

Enter the amounts in this schedule in the functional currency of the foreign corporation as reported on Form 5471, page 1, item 1h. If the foreign corporation is the owner of a qualified business unit(s) (QBU) with a different functional currency, translate the E&P of the QBU(s) to the foreign corporation's functional currency.

### Columns (a), (b), and (c)

Report the opening balance, current year additions and subtractions, and the closing balance in the foreign corporation's E&P described in section 959(c)(3). In general, this is E&P of the foreign corporation that has not been included in gross income of a U.S. person under section 951(a)(1) and section 951A.

In column (a), report E&P described in section 959(c)(3) and earned after the repeal of section 902, that is, post-2017 E&P not previously taxed (post-2017 section 959(c)(3) balance). The repeal of section 902 is effective for tax years of foreign corporations beginning after December 31, 2017, and to tax years of U.S. shareholders in which or with which such tax years of foreign corporations end.

In column (b), report post-1986 undistributed earnings, as defined under section 902(c)(1), and as in effect prior to the repeal of section 902.

Use column (c) to report the aggregate amount of the foreign corporation's pre-1987 section 964(a) E&P accumulated since 1962 and not previously distributed or deemed distributed. These amounts are figured in U.S. dollars using the rules of Regulations sections 1.964-1(a) through (e), translated into the foreign corporation's functional currency according to Notice 88-70, 1988-2 C.B. 369.

### Column (d)

Use column (d) to report hovering deficits (see section 381(c)(2)(B) and Regulations section 1.367(b)-7) and suspended taxes (see section 909). See *Specific*

*instructions related to lines 1 through 14*, below, for additional information pertaining to reporting amounts in column (d).

### Column (e)

Use column (e) to report the running balance of the foreign corporation's PTEP, section 964(a) E&P accumulated since 1962 that have resulted in deemed inclusions under subpart F, or amounts treated as PTEP under section 965(b)(4)(A). Pre-1987 U.S. dollar PTEP should be translated into the foreign corporation's functional currency using the rules of Notice 88-70 and added to post-1986 amounts in the appropriate PTEP category.

- Columns (e)(i) and (e)(ii) are PTEP originally attributable to inclusions under section 965(a) and section 965(b)(4)(A), respectively, and reclassified as investments in U.S. property (section 959(c)(1)(A) amounts).
- Column (e)(iii) is PTEP attributable to, or reclassified as, investments in U.S. property (section 959(c)(1)(A) amounts).
- Column (e)(iv) is PTEP originally attributable to inclusions under section 951A and reclassified as investments in U.S. property (section 959(c)(1)(A) amounts).
- Column (e)(v) is PTEP attributable to hybrid dividends under section 245A(e)(2) and reclassified as investments in U.S. property.
- Column (e)(vi) is PTEP attributable to section 1248 amounts under section 959(e) and reclassified as investments in U.S. property.
- Column (e)(vii) is PTEP attributable to section 1248 amounts from the gain on the sale of a CFC by a CFC and reclassified as investments in U.S. property.
- Column (e)(viii) is PTEP attributable to subpart F income inclusions (not already described) and reclassified as investments in U.S. property.
- Column (e)(ix) is PTEP attributable to inclusions under previous section 951(a)(1)(C) and reclassified as investments in U.S. property.
- Column (e)(x) is PTEP attributable to section 965(a) inclusions (section 959(c)(2) amounts). Do not include E&P reported in column (e)(xi).
- Column (e)(xi) is E&P treated as PTEP under section 965(b)(4)(A) (section 959(c)(2) amounts).
- Column (e)(xii) is PTEP attributable to section 951A inclusions (section 959(c)(2) amounts).
- Column (e)(xiii) is PTEP attributable to hybrid dividends under section 245A(e)(2).
- Column (e)(xiv) is PTEP attributable to section 1248 amounts under section 959(e).

- Column (e)(xv) is PTEP attributable to section 1248 amounts from the gain on the sale of a CFC by a CFC.
- Column (xvi) is PTEP attributable to section 951(a)(1)(A) inclusions (section 959(c)(2) amounts).

### Column (f)

Use column (f) to report the opening and closing balance of the foreign corporation's accumulated E&P. This amount is the sum of post-2017 E&P not previously taxed, post-1986 undistributed earnings, pre-1987 E&P not previously taxed, and PTEP. Do not include column (d) amounts in the total reported in column (f).

## Specific Instructions Related to Lines 1 Through 13

**Line 1a.** Enter the balances for each column at the beginning of the tax year. These balances should equal the amounts reported as the ending balances in the prior year Schedule J.

**Line 1b.** If there is a difference between last year's ending balance on Schedule J and the amount that should be last year's ending balance, taking into account modifications in Schedule J, include the difference on line 1b and attach an explanation for the difference. If there are multiple differences, include the explanation and amount of each such difference on the attachment. Do not include adjustments required to be reported on line 6 or 12.

**Lines 1a through 1c.** These lines of column (d) account for the balance of prior year hovering deficits and suspended taxes that have not yet been deducted in prior years. Such amounts are reported as negative numbers.

**Line 2a.** This line of column (d) is the unsuspended taxes under section 909 as a result of related income taken into account by the foreign corporation, certain U.S. corporate owners of the foreign corporation, or a member of such U.S. corporate owner's consolidated group. Report the unsuspended taxes on line 2a of column (d) as a positive number. Report the unsuspended taxes as negative numbers on line 2a of column (a), (b), (c), or (e), as applicable.

**Line 2b.** This line of column (d) accounts for foreign income taxes that are suspended in the current tax year. Report such amounts as negative numbers.

**Line 4.** Report as a positive number E&P attributable to PTEP distributions from lower-tier foreign corporations. Generally, the E&P of a CFC attributable to amounts that are, or have been, included in the gross income of a U.S. shareholder under section 951(a), are not, when distributed through a chain of ownership described in

section 958(a), also included in the gross income of another CFC in such chain for purposes of the application of section 951(a) to such other CFC with respect to such U.S. shareholder. See section 959(b).

**Line 5a.** Enter earnings carried over to a foreign surviving corporation after an acquisition by a foreign corporation of the assets of another foreign corporation in a transaction described in section 381. See Regulations section 1.367(b)-7. The amounts entered on line 5a may be negative or positive.

**Line 5b.** If the foreign surviving corporation had a deficit in E&P prior to a transaction described in section 381, such deficit is recharacterized as a hovering deficit after such nonrecognition transaction. See section 381(c)(2)(B) and Regulations sections 1.367(b)-7(d)(2)(i) (post-1986 undistributed earnings) and 1.367(b)-7(e)(1) (pre-1987 E&P not previously taxed). An amount equal to the deficit reported in column (a), (b), or (c) of line 5a is included as a positive amount on line 5b of column (a), (b), or (c), respectively. An amount equal to the total hovering deficits reported on line 5b of columns (a), (b), and (c) is included as a negative number in column (d) of line 5b.

**Line 6.** Attach a statement detailing the nature and amount of any adjustments not accounted for in the E&P determined before reduction for distributions and inclusions (that is, adjustments other than those listed on lines 2a through 5b). Do not include amounts reported on line 1b. An example of an adjustment entered on Line 6 is the foreign taxes imposed on receipt of a distribution of PTEP from a lower-tier foreign corporation.

**Example.** Domestic Corporation, a U.S. shareholder, wholly owns the only class of stock of CFC1, a foreign corporation. CFC1, in turn, wholly owns the only class of stock of CFC2, a foreign corporation. CFC2, in turn, wholly owns the only class of stock of CFC3, a foreign corporation. The functional currency of Domestic Corporation, CFC1, CFC2, and CFC3 is the U.S. dollar. During Year 1, Domestic Corporation reports an inclusion under section 951(a)(1) of \$100 as a result of subpart F income of CFC3. During Year 2, CFC3 distributes \$40 to CFC2. CFC2 pays withholding tax of \$4 on the distribution from CFC3. Such tax is related to previously taxed subpart F income. Domestic Corporation reports on CFC2's Form 5471, Schedule J, line 3, column (e) (xvi), as a positive number, the \$40 PTEP distribution. Domestic Corporation reports on line 6, column (e)(xvi), as a negative number, the \$4 of tax on the PTEP distribution.

**Line 7.** Enter on line 7, E&P as of the close of the tax year before actual distributions or inclusions under section 951(a)(1) or section 951A during the year. For dividends paid by certain foreign corporations in U.S. tax years beginning before January 1, 2018, this number in column (b) generally is the denominator of the deemed paid credit fraction under section 902(c)(1) used for foreign tax credit purposes.

**Line 8.** Enter amounts included in gross income of the U.S. shareholder(s) under section 951(a)(1)(A) or section 951A with respect to the CFC. Report the inclusion as a negative amount in columns (a) through (c), as applicable. Report the inclusion as a positive amount in column (e)(x) through (e)(xvi), as applicable. Amounts reported as positive numbers on line 8 of column (e)(x) or (e)(xi) should only be reported with respect to negative amounts on line 8 of column (b). Amounts reported as positive numbers on line 8 of column (e)(xii) should only be reported with respect to negative amounts on line 8 of column (a). The negative amounts could be reported on a different schedule J than the positive amounts if such amounts are reclassified from one separate category to another separate category.

**Note.** Section 951(a)(1)(A) inclusions are taken into account for the tax year before actual distributions and section 951(a)(1)(B) inclusions. See section 959(a).

**Note.** The amount included in gross income of U.S. shareholders of the CFC under section 951A might not be known if there is more than one U.S. shareholder. See the example in the instructions for Schedule P for reporting information.

**Example.** Domestic Corporation wholly owns the stock of CFC1 and CFC2, each a foreign corporation. Thus, Domestic Corporation is a U.S. shareholder of CFC1 and CFC2. The functional currency of Domestic Corporation, CFC1, and CFC2 is the U.S. dollar. During Year 1, CFC1 has tested income of \$100, which is equal to CFC1's current year E&P in Year 1, and CFC2 has a tested loss of \$40, which is equal to CFC2's current year E&P deficit in Year 1. Domestic Corporation's year 1 income inclusion under section 951A is \$60 (\$100 - \$40). Neither CFC1 nor CFC2 have accumulated E&P at the beginning of year 1.

Domestic Corporation reports on CFC1's Schedule J (Form 5471) with respect to the general category, column (a), as follows:

Line	Amount
3	\$100
7	\$100
8	(\$60)
14	\$40

Domestic Corporation reports on CFC1's Schedule J (Form 5471) with respect to the general category, column (e)(xii) as follows:

Line	Amount
8	\$60
12	(\$60)

Domestic Corporation completes a second Schedule J (Form 5471) for CFC1, but with respect to the section 951A category, column (e)(xii) as follows:

Line	Amount
12	\$60
14	\$60

Domestic Corporation reports on CFC2's Schedule J (Form 5471), with respect to the general category, column (a), as follows:

Line	Amount
3	(\$40)
7	(\$40)
14	(\$40)

**Line 9.** Report actual distributions as negative numbers.

**Note.** Actual distributions are taken into account for the tax year before section 951(a)(1)(B) inclusions. See section 959(f)(2). An actual distribution is first out of PTEP, if any, and then out of the section 959(c)(3) balance. See section 959(c).

**Line 10.** Use line 10 to report reclassifications of section 959(c)(2) PTEP in columns (e)(x) through (xvi) to section 959(c)(1) PTEP in columns (e)(i) through (viii). A potential section 951(a)(1)(B) inclusion results in a reclassification of section 959(c)(2) PTEP, if any, to section 959(c)(1) PTEP before reclassification out of the section 959(c)(3) E&P balance. See section 959(a)(2) and (f)(1). The amounts reclassified are reported as negative numbers in columns (e)(x) through (xvi) and positive numbers in columns (e)(i) through (viii), as applicable.

**Line 11.** Use this line to report E&P not previously taxed, which is treated as

earnings invested in U.S. property and, therefore, reclassified to section 959(c)(1) PTEP (column (e)(iii)). The amounts reclassified are reported as negative numbers in columns (a) through (c) and positive numbers in column (e)(iii), as applicable.

**Line 12.** Attach a statement detailing the nature and amount of any adjustments in E&P not accounted for on lines 8 through 11. Do not include adjustments required to be reported on line 1b or line 6.

**Line 13.** The hovering deficit offset included in column (d) is reported as a positive number. The same amount entered in column (d) is reported as a negative number on line 13 of column (a) or (b), as appropriate. See section 381(c)(2)(B) and Regulations section 1.367(b)-7(d)(2)(ii).

## Schedule M

Every U.S. person described in Category 4 must file Schedule M to report the transactions that occurred during the foreign corporation's annual accounting period ending with or within the U.S. person's tax year.

If a U.S. corporation that owns stock in a foreign corporation is a member of a consolidated group, list the common parent as the U.S. person filing Schedule M.

**Important.** In translating the amounts from functional currency to U.S. dollars, use the average exchange rate for the foreign corporation's tax year. See section 989(b). Report the exchange rate in the entry space provided at the top of Schedule M using the "divide-by convention" specified under [Reporting exchange rates on Form 5471](#), earlier.

**Name of person filing Form 5471.** The name of the person filing Form 5471 is generally the name of the U.S. person described in the applicable category or categories of filers (see [Categories of Filers](#), earlier). However, in the case of a consolidated return, enter the name of the U.S. parent in the field for "Name of person filing Form 5471."

**Reference ID number.** Use the reference ID number shown on Form 5471, line 1b(2).

**Lines 4 and 17.** Report on these lines platform contribution transaction payments received and paid by the foreign corporation (without giving effect to any netting of payments due and owed). See Regulations section 1.482-7(b)(1)(ii). The corporation is required to complete both lines only if the corporation provides a platform contribution to other controlled participants and is required to make platform contribution transaction payments to other controlled participants

that provide a platform contribution to other controlled cost sharing arrangement participants.

**Lines 5 and 18.** Report on these lines cost sharing transaction payments received and paid by the foreign corporation (without giving effect to any netting of payments due and owed). See Regulations section 1.482-7(1)(i). The corporation is required to complete line 5 only if the corporation itself incurred intangible development costs. If the corporation does not itself incur intangible development costs, then it should only report cost sharing transaction payments made on line 18.

**Lines 9 and 22.** Report on line 9 hybrid dividends received by the foreign corporation to which section 245A(e)(2) applies, and report on line 22 hybrid dividends paid by the foreign corporation to which section 245A(e)(1) or (2) applies. A hybrid dividend generally is any dividend from a controlled foreign corporation for which the CFC received a deduction (or other tax benefit) under a foreign tax law.

**Lines 10 and 23.** Report on these lines dividends received and paid by the foreign corporation not previously taxed under subpart F in the current year or in any prior year.

**Lines 27 and 29.** Report on these lines the largest aggregate outstanding accounts receivable and payable balances during the year with the related parties described in columns (b) through (f). Report only accounts receivables or payables arising in connection with the provision of services or the sale or processing of property. Only net accounts receivables and payables to the extent that the CFC's books net the accounts payable against the receivables as payment of the accounts receivable.

**Lines 28 and 30.** Report on these lines the largest outstanding balances during the year of gross amounts borrowed from, and gross amounts loaned to, the related parties described in columns (b) through (f). Do not enter aggregate cash flows, year-end loan balances, average balances, or net balances. Do not include an account receivable or payable balance arising in connection with the provision of services or the sale or processing of property if the amount of such balance does not, at any time during the tax year, exceed what is ordinary and necessary to carry on the trade or business. Any outstanding balance from these transactions should be reported on the Balance Sheet (Form 5471, Schedule F, page 4) and possibly also on Schedule M, lines 27 and 29.

**Accrued payments and receipts.** A corporation that uses an accrual method

of accounting must use accrued payments and accrued receipts for purposes of computing the total amount to enter on each line of Schedule M.

## Schedule O

Schedule O is used to report the organization or reorganization of a foreign corporation and the acquisition or disposition of its stock.

Every U.S. citizen or resident described in Category 2 must complete Part I. Every U.S. person described in Category 3 must complete Part II.

See Regulations section 1.6046-1(i) for rules on determining when U.S. persons constructively own stock of a foreign corporation and therefore are subject to the section 6046 filing requirements.

**Name of person filing Form 5471.** The name of the person filing Form 5471 is generally the name of the U.S. person described in the applicable category or categories of filers (see [Categories of Filers](#), earlier). However, in the case of a consolidated return, enter the name of the U.S. parent in the field for "Name of person filing Form 5471."

**Reference ID number.** Use the reference ID number shown on Form 5471, line 1b(2).

### Part I

**Column (d).** Enter the date the shareholder first acquired 10% or more (in value or voting power) of the outstanding stock of the foreign corporation.

**Column (e).** Enter the date the shareholder acquired (whether in one or more transactions) an additional 10% or more (in value or voting power) of the outstanding stock of the foreign corporation.

### Part II

#### Section A—General Shareholder Information

If the shareholder's latest tax return was filed electronically, enter "e-filed" in column (b)(3) instead of a service center.

#### Section C—Acquisition of Stock

Section C is completed by shareholders who are completing Schedule O because they have acquired sufficient stock in a foreign corporation. If the shareholder acquired the stock in more than one transaction, use a separate line to report each transaction.

**Column (d).** Enter the method of acquisition (for example, purchase, gift, bequest, trade).

**Column (e)(2).** Enter the number of shares acquired indirectly (within the

meaning of section 958(a)(2)) by the shareholder listed in column (a).

**Column (e)(3).** Enter the number of shares constructively owned (within the meaning of section 958(b)) by the shareholder listed in column (a).

## Section D—Disposition of Stock

Section D must be completed by shareholders who dispose of their interest (in whole or in part) in a foreign corporation.

**Column (d).** Enter the method of disposition (for example, sale, bequest, gift, trade).

**Example.** In 1999, Mr. Jackson, a U.S. citizen, purchased 10,000 shares of common stock of foreign corporation X. The purchase represented 10% ownership of the foreign corporation.

On July 1, 2019, Mr. Jackson made a gift of 5,000 shares of foreign corporation X to his son, John. Because Mr. Jackson has reduced his holding in the foreign corporation, he is required to complete Form 5471 and Schedule O. To show the required information about the disposition, Mr. Jackson completes Section D as follows:

- Enters his name in column (a).
- Enters “common” in column (b).
- Enters “July 1, 2019” in column (c).
- Enters “gift” in column (d).
- Enters “5,000” in column (e)(1).
- Enters “-0-” in column (f) because the disposition was by gift.
- Enters the name and address of his son, John, in column (g).

## Section F—Additional Information

**Item (b).** List the date of any reorganization of the foreign corporation that occurred during the last 4 years while any U.S. person held 10% or more in value or vote (directly or indirectly) of the corporation's stock. If there is more than one such date, use the most recent date. However, do not enter a date for which information was reported on Schedule E. Instead, enter the date (if any) of any reorganization prior to that date (if it is within the last 4 years).

**Example for Item (c).** Mr. Lyons, a U.S. person, acquires a 10% ownership in foreign corporation F. F is the 100% owner of two foreign corporations, FI and FJ. F is also a 50% owner of foreign corporation FK. In addition, F is 90% owned by foreign corporation W. Mr. Lyons does not own any of the stock of corporation W.

Mr. Lyons completes and files Form 5471 and Schedule O for the corporations in which he is a 10% or more shareholder. Mr. Lyons also is required to submit a chart if the foreign corporation is a

member of a chain of corporations, and to indicate if he is a 10% or more shareholder in any of those corporations.

Mr. Lyons would prepare a list showing the corporations as follows.

- Corporation W.
- Corporation F.
- Corporation FI.
- Corporation FJ.
- Corporation FK.

Then Mr. Lyons is required to indicate that he is a 10% or more shareholder in corporations F, FI, and FJ.

## Schedule P

Use Schedule P to report the PTEP of the U.S. shareholder of a CFC in the CFC's functional currency (Part I) and in U.S. dollars (Part II). Also use this schedule to report the PTEP of the U.S. shareholder of an SFC that is only treated as a CFC for limited purposes under section 965(e)(2).

**Note.** A separate Schedule P must be completed by each Category 1, 4, or 5 U.S. shareholder of the foreign corporation with respect to which reporting is furnished on this Form 5471. However, Category 1 and 5 filers who are related constructive U.S. shareholders are not required to file Schedule P for foreign-controlled corporations. See [Certain Category 1 and Category 5 Filers](#) under *Categories of Filers*.

If a U.S. shareholder wholly owns the CFC, Schedule P should include the same information reported on Schedule J, Part I, column (e). If there is more than one U.S. shareholder, the amounts reported on Schedule P with respect to each U.S. shareholder might be different from the amounts reported on Schedule J.

**Example.** Corporation A, a domestic corporation, owns 50% of the only class of stock of CFC1 and Corporation B, a domestic corporation, owns the remaining 50% of the stock of CFC1. Corporation A wholly owns the only class of stock of CFC2. The functional currency of all corporations is the U.S. dollar. CFC1 has tested income of \$100x and CFC2 has tested loss of \$30x. See section 951A(c)(2). Neither Corporation A nor Corporation B has any net deemed tangible income return that would reduce the tested income taken into account by Corporation A or B with respect to CFC1. Corporation A has a section 951A inclusion of \$20 because its pro rata share of CFC1's tested income (\$50x) is offset by its pro rata share of CFC2's tested loss (\$30x). Corporation B has a section 951A inclusion of \$50x. On Schedule P of the Form 5471 with respect to CFC1 filed by Corporation B, Corporation B will report on line 7, column (i), \$50x of PTEP as a result of its section 951A inclusion with respect to CFC1. Corporation A will report \$20x of

PTEP as a result of its section 951A inclusion on its Form 5471, Schedule P, line 7, column (i), with respect to CFC1.

The Form 5471, Schedule J, for CFC1 should include PTEP of \$70x with respect to the aggregate section 951A inclusions of Corporation A and Corporation B. However, if Corporation A does not know Corporation B's section 951A inclusion at the time Corporation A files its Form 5471, Corporation A will only be able to complete Schedule J, Part I, with respect to its PTEP of \$20x on line 8, column (e) (xvi). Similarly, Corporation B will only be able to complete Schedule J, Part I, with respect to its PTEP of \$50x on line 8, column (e)(xvi). In the following year, Corporation A and Corporation B should each report the other corporation's PTEP on Schedule J, Part I, line 1b, column (e) (xvi).

**Name of person filing Form 5471.** For the December 2019 revision of Schedule P (Form 5471), there should be entry spaces for the name and identifying number of the person filing Form 5471. **Please include this information in the top margin of page 1 of the schedule.** Please note that the name of the person filing Form 5471 is generally the name of the U.S. person described in the applicable category or categories of filers (see [Categories of Filers](#), earlier). However, in the case of a consolidated return, enter the name of the U.S. parent in the field for “Name of person filing Form 5471.”

**Reference ID number.** If applicable, use the reference ID number shown on Form 5471, page 1, Item 1b(2).

**Lines a and b.** Complete a separate Schedule P for each applicable separate category of income. Enter the appropriate code on line a (at the top of page 1 of Schedule P). To determine the appropriate code, see *Categories of Income* in the Instructions for Form 1118. A foreign corporation may have PTEP in a PTEP group within any of the separate categories of income, with the exception of foreign branch category income. See Regulations section 1.960-3(c)(1).

If code 901(j) is entered on line a, enter on line b the country code for the sanctioned country using the two-letter codes (from the list at [IRS.gov/countrycodes](#)).

**Note.** For purposes of this Schedule P, include in each separate category of income foreign and U.S. income.

**Columns (a) through (q).** Enter amounts on this schedule in the functional currency of the foreign corporation as reported on Form 5471, page 1, Item 1h.

Use columns (a) through (q) to report the opening balance, current year

additions and subtractions, and the closing balance in the foreign corporation's PTEP; section 964(a) E&P accumulated since 1962 that have resulted in inclusions under subpart F; and amounts treated as PTEP under section

965(b)(4)(A). Pre-1987 U.S. dollar PTEP should be translated into the foreign corporation's functional currency using the rules of Notice 88-70 and added to post-1986 amounts in the appropriate PTEP category.

Columns (a) through (p) of Schedule P correspond to Schedule J, columns (e)(i) through (e)(xvi). See the instructions for [Schedule J](#) for specific line instructions.

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**Paperwork Reduction Act Notice.** We ask for the information on this form to carry out the Internal Revenue laws of the United States. You are required to give us the information. We need it to ensure that you are complying with these laws and to allow us to figure and collect the right amount of tax.

You are not required to provide the information requested on a form that is subject to the Paperwork Reduction Act unless the form displays a valid OMB control number. Books or records relating to a form or its instructions must be retained as long as their contents may become material in the administration of any Internal Revenue law. Generally, tax returns and return information are confidential, as required by section 6103.

The time needed to complete and file this form will vary depending on individual circumstances. The estimated burden for individual and business taxpayers filing this form is approved under OMB control number 1545-0074 and 1545-0123 and is included in the estimates shown in the instructions for their individual and business income tax return.

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**Form 5471**

**Codes for Principal Business Activity**

This list of principal business activities and their associated codes is designed to classify an enterprise by the type of activity in which it is engaged to facilitate the administration of the Internal Revenue Code. These

principal business activity codes are based on the North American Industry Classification System.

Using the list of activities and codes below, determine from which activity the company derives the largest percentage of its "total receipts." If the company purchases raw materials and supplies them to a subcontractor to produce the finished product, but

retains title to the product, the company is considered a manufacturer and must use one of the manufacturing codes (31110-339900).

Enter on page 1, Item 1f, the six-digit code selected from the list below. In item 1g, enter a brief description of the company's business activity.

<p><b>Agriculture, Forestry, Fishing and Hunting</b></p>	<p>238900 painting, wallcovering, flooring, tile, &amp; finish carpentry) Other Specialty Trade Contractors (including site preparation)</p>	<p>326200 Rubber Product Mfg</p>	<p>339900 Other Miscellaneous Manufacturing</p>
<p><b>Crop Production</b></p>	<p><b>Manufacturing</b></p>	<p><b>Nonmetallic Mineral Product Manufacturing</b></p>	<p><b>Wholesale Trade</b></p>
<p>111100 Oilseed &amp; Grain Farming</p>	<p><b>Food Manufacturing</b></p>	<p>327100 Clay Product &amp; Refractory Mfg</p>	<p><b>Merchant Wholesalers, Durable Goods</b></p>
<p>111210 Vegetable &amp; Melon Farming (including potatoes &amp; yams)</p>	<p>311110 Animal Food Mfg</p>	<p>327210 Glass &amp; Glass Product Mfg</p>	<p>423100 Motor Vehicle &amp; Motor Vehicle Parts &amp; Supplies</p>
<p>111300 Fruit &amp; Tree Nut Farming</p>	<p>311200 Grain &amp; Oilseed Milling</p>	<p>327300 Cement &amp; Concrete Product Mfg</p>	<p>423200 Furniture &amp; Home Furnishings</p>
<p>111400 Greenhouse, Nursery, &amp; Floriculture Production</p>	<p>311300 Sugar &amp; Confectionery Product Mfg</p>	<p>327400 Lime &amp; Gypsum Product Mfg</p>	<p>423300 Lumber &amp; Other Construction Materials</p>
<p>111900 Other Crop Farming (including tobacco, cotton, sugarcane, hay, peanut, sugar beet &amp; all other crop farming)</p>	<p>311400 Fruit &amp; Vegetable Preserving &amp; Specialty Food Mfg</p>	<p>327900 Other Nonmetallic Mineral Product Mfg</p>	<p>423400 Professional &amp; Commercial Equipment &amp; Supplies</p>
<p><b>Animal Production</b></p>	<p>311500 Dairy Product Mfg</p>	<p><b>Primary Metal Manufacturing</b></p>	<p>423500 Metal &amp; Mineral (except Petroleum)</p>
<p>112111 Beef Cattle Ranching &amp; Farming</p>	<p>311610 Animal Slaughtering and Processing</p>	<p>331110 Iron &amp; Steel Mills &amp; Ferroalloy Mfg</p>	<p>423600 Household Appliances &amp; Electrical &amp; Electronic Goods</p>
<p>112112 Cattle Feedlots</p>	<p>311710 Seafood Product Preparation &amp; Packaging</p>	<p>331200 Steel Product Mfg from Purchased Steel</p>	<p>423700 Hardware &amp; Plumbing &amp; Heating Equipment &amp; Supplies</p>
<p>112120 Dairy Cattle &amp; Milk Production</p>	<p>311800 Bakeries, Tortilla &amp; Dry Pasta Mfg</p>	<p>331310 Alumina &amp; Aluminum Production &amp; Processing</p>	<p>423800 Machinery, Equipment, &amp; Supplies</p>
<p>112210 Hog &amp; Pig Farming</p>	<p>311900 Other Food Mfg (including coffee, tea, flavorings &amp; seasonings)</p>	<p>331400 Nonferrous Metal (except Aluminum) Production &amp; Processing</p>	<p>423910 Sporting &amp; Recreational Goods &amp; Supplies</p>
<p>112300 Poultry &amp; Egg Production</p>	<p><b>Beverage and Tobacco Product Manufacturing</b></p>	<p>331500 Foundries</p>	<p>423920 Toy &amp; Hobby Goods &amp; Supplies</p>
<p>112400 Sheep &amp; Goat Farming</p>	<p>312110 Soft Drink &amp; Ice Mfg</p>	<p><b>Fabricated Metal Product Manufacturing</b></p>	<p>423930 Recyclable Materials</p>
<p>112510 Aquaculture (including shellfish &amp; finfish farms &amp; hatcheries)</p>	<p>312120 Breweries</p>	<p>332110 Forging &amp; Stamping</p>	<p>423940 Jewelry, Watch, Precious Stone, &amp; Precious Metals</p>
<p>112900 Other Animal Production</p>	<p>312130 Wineries</p>	<p>332210 Cutlery &amp; Handtool Mfg</p>	<p>423990 Other Miscellaneous Durable Goods</p>
<p><b>Forestry and Logging</b></p>	<p>312140 Distilleries</p>	<p>332300 Architectural &amp; Structural Metals Mfg</p>	<p><b>Merchant Wholesalers, Nondurable Goods</b></p>
<p>113110 Timber Tract Operations</p>	<p>312200 Tobacco Manufacturing</p>	<p>332400 Boiler, Tank, &amp; Shipping Container Mfg</p>	<p>424100 Paper &amp; Paper Products</p>
<p>113210 Forest Nurseries &amp; Gathering of Forest Products</p>	<p><b>Textile Mills and Textile Product Mills</b></p>	<p>332510 Hardware Mfg</p>	<p>424210 Drugs &amp; Druggists' Sundries</p>
<p>113310 Logging</p>	<p>313000 Textile Mills</p>	<p>332610 Spring &amp; Wire Product Mfg</p>	<p>424300 Apparel, Piece Goods, &amp; Notions</p>
<p><b>Fishing, Hunting and Trapping</b></p>	<p>314000 Textile Product Mills</p>	<p>332700 Machine Shops; Turned Product; &amp; Screw, Nut, &amp; Bolt Mfg</p>	<p>424400 Grocery &amp; Related Products</p>
<p>114110 Fishing</p>	<p><b>Apparel Manufacturing</b></p>	<p>332810 Coating, Engraving, Heat Treating, &amp; Allied Activities</p>	<p>424500 Farm Product Raw Materials</p>
<p>114210 Hunting &amp; Trapping</p>	<p>315100 Apparel Knitting Mills</p>	<p>332900 Other Fabricated Metal Product Mfg</p>	<p>424600 Chemical &amp; Allied Products</p>
<p><b>Support Activities for Agriculture and Forestry</b></p>	<p>315210 Cut &amp; Sew Apparel Contractors</p>	<p><b>Machinery Manufacturing</b></p>	<p>424700 Petroleum &amp; Petroleum Products</p>
<p>115110 Support Activities for Crop Production (including cotton ginning, soil preparation, planting, &amp; cultivating)</p>	<p>315220 Men's &amp; Boys' Cut &amp; Sew Apparel Mfg</p>	<p>333100 Agriculture, Construction, &amp; Mining Machinery Mfg</p>	<p>424800 Beer, Wine, &amp; Distilled Alcoholic Beverages</p>
<p>115210 Support Activities for Animal Production</p>	<p>315240 Women's, Girls' &amp; Infants' Cut &amp; Sew Apparel Mfg</p>	<p>333200 Industrial Machinery Mfg</p>	<p>424910 Food Supplies</p>
<p>115310 Support Activities For Forestry</p>	<p>315280 Other Cut &amp; Sew Apparel Mfg</p>	<p>333310 Commercial &amp; Service Industry Machinery Mfg</p>	<p>424920 Book, Periodical, &amp; Newspapers</p>
<p><b>Mining</b></p>	<p>315990 Apparel Accessories &amp; Other Apparel Mfg</p>	<p>333410 Ventilation, Heating, Air-Conditioning, &amp; Commercial Refrigeration Equipment Mfg</p>	<p>424930 Flower, Nursery Stock, &amp; Florists' Supplies</p>
<p>211120 Crude Petroleum Extraction</p>	<p><b>Leather and Allied Product Manufacturing</b></p>	<p>333510 Metalworking Machinery Mfg</p>	<p>424940 Tobacco &amp; Tobacco Products</p>
<p>211130 Natural Gas Extraction</p>	<p>316110 Leather &amp; Hide Tanning &amp; Finishing</p>	<p>333610 Engine, Turbine &amp; Power Transmission Equipment Mfg</p>	<p>424950 Paint, Varnish, &amp; Supplies</p>
<p>212110 Coal Mining</p>	<p>316210 Footwear Mfg (including rubber &amp; plastics)</p>	<p>333900 Other General Purpose Machinery Mfg</p>	<p>424990 Other Miscellaneous Nondurable Goods</p>
<p>212200 Metal Ore Mining</p>	<p>316990 Other Leather &amp; Allied Product Mfg</p>	<p><b>Computer and Electronic Product Manufacturing</b></p>	<p><b>Wholesale Electronic Markets and Agents and Brokers</b></p>
<p>212310 Stone Mining &amp; Quarrying</p>	<p><b>Wood Product Manufacturing</b></p>	<p>334110 Computer &amp; Peripheral Equipment Mfg</p>	<p>425110 Business to Business Electronic Markets</p>
<p>212320 Sand, Gravel, Clay, &amp; Ceramic &amp; Refractory Minerals Mining &amp; Quarrying</p>	<p>321110 Sawmills &amp; Wood Preservation</p>	<p>334200 Communications Equipment Mfg</p>	<p>425120 Wholesale Trade Agents &amp; Brokers</p>
<p>212390 Other Nonmetallic Mineral Mining &amp; Quarrying</p>	<p>321210 Veneer, Plywood, &amp; Engineered Wood Product Mfg</p>	<p>334310 Audio &amp; Video Equipment Mfg</p>	<p><b>Retail Trade</b></p>
<p>213110 Support Activities for Mining</p>	<p>321900 Other Wood Product Mfg</p>	<p>334410 Semiconductor &amp; Other Electronic Component Mfg</p>	<p><b>Motor Vehicle and Parts Dealers</b></p>
<p><b>Utilities</b></p>	<p><b>Paper Manufacturing</b></p>	<p>334500 Navigational, Measuring, Electromedical, &amp; Control Instruments Mfg</p>	<p>441110 New Car Dealers</p>
<p>221100 Electric Power Generation, Transmission &amp; Distribution</p>	<p>322100 Pulp, Paper, &amp; Paperboard Mills</p>	<p>334610 Manufacturing &amp; Reproducing Magnetic &amp; Optical Media</p>	<p>441120 Used Car Dealers</p>
<p>221210 Natural Gas Distribution</p>	<p>322200 Converted Paper Product Mfg</p>	<p><b>Electrical Equipment, Appliance, and Component Manufacturing</b></p>	<p>441210 Recreational Vehicle Dealers</p>
<p>221300 Water, Sewage &amp; Other Systems</p>	<p><b>Printing and Related Support Activities</b></p>	<p>335100 Electric Lighting Equipment Mfg</p>	<p>441222 Boat Dealers</p>
<p>221500 Combination Gas &amp; Electric</p>	<p>323100 Printing &amp; Related Support Activities</p>	<p>335200 Major Household Appliance Mfg</p>	<p>441228 Motorcycle, ATV, &amp; All other Motor Vehicle Dealers</p>
<p><b>Construction</b></p>	<p><b>Petroleum and Coal Products Manufacturing</b></p>	<p>335310 Electrical Equipment Mfg</p>	<p>441228 Motorcycle, ATV, &amp; All other Motor Vehicle Dealers</p>
<p><b>Construction of Buildings</b></p>	<p>324110 Petroleum Refineries (including integrated)</p>	<p>335900 Other Electrical Equipment &amp; Component Mfg</p>	<p>441300 Automotive Parts, Accessories, &amp; Tire Stores</p>
<p>236110 Residential Building Construction</p>	<p>324120 Asphalt Paving, Roofing, &amp; Saturated Materials Mfg</p>	<p><b>Transportation Equipment Manufacturing</b></p>	<p><b>Furniture and Home Furnishings Stores</b></p>
<p>236200 Nonresidential Building Construction</p>	<p>324190 Other Petroleum &amp; Coal Products Mfg</p>	<p>336100 Motor Vehicle Mfg</p>	<p>442110 Furniture Stores</p>
<p><b>Heavy and Civil Engineering Construction</b></p>	<p><b>Chemical Manufacturing</b></p>	<p>336210 Motor Vehicle Body &amp; Trailer Mfg</p>	<p>442210 Floor Covering Stores</p>
<p>237100 Utility System Construction</p>	<p>325100 Basic Chemical Mfg</p>	<p>336300 Motor Vehicle Parts Mfg</p>	<p>442291 Window Treatment Stores</p>
<p>237210 Land Subdivision</p>	<p>325200 Resin, Synthetic Rubber, &amp; Artificial &amp; Synthetic Fibers &amp; Filaments Mfg</p>	<p>336410 Aerospace Product &amp; Parts Mfg</p>	<p>442299 All Other Home Furnishings Stores</p>
<p>237310 Highway, Street, &amp; Bridge Construction</p>	<p>325300 Pesticide, Fertilizer, &amp; Other Agricultural Chemical Mfg</p>	<p>336510 Railroad Rolling Stock Mfg</p>	<p><b>Electronics and Appliance Stores</b></p>
<p>237990 Other Heavy &amp; Civil Engineering Construction</p>	<p>325410 Pharmaceutical &amp; Medicine Mfg</p>	<p>336610 Ship &amp; Boat Building</p>	<p>443141 Household Appliance Stores</p>
<p><b>Specialty Trade Contractors</b></p>	<p>325500 Paint, Coating, &amp; Adhesive Mfg</p>	<p>336990 Other Transportation Equipment Mfg</p>	<p>443142 Electronic Stores (including Audio, Video, Computer, &amp; Camera Stores)</p>
<p>238100 Foundation, Structure, &amp; Building Exterior Contractors (including framing carpentry, masonry, glass, roofing, &amp; siding)</p>	<p>325600 Soap, Cleaning Compound, &amp; Toilet Preparation Mfg</p>	<p><b>Furniture and Related Product Manufacturing</b></p>	<p><b>Building Material and Garden Equipment and Supplies Dealers</b></p>
<p>238210 Electrical Contractors</p>	<p>325900 Other Chemical Product &amp; Preparation Mfg</p>	<p>337000 Furniture &amp; Related Product Manufacturing</p>	<p>444110 Home Centers</p>
<p>238220 Plumbing, Heating, &amp; Air-Conditioning Contractors</p>	<p><b>Plastics and Rubber Products Manufacturing</b></p>	<p><b>Miscellaneous Manufacturing</b></p>	<p>444120 Paint &amp; Wallpaper Stores</p>
<p>238290 Other Building Equipment Contractors</p>	<p>326100 Plastics Product Mfg</p>	<p>339110 Medical Equipment &amp; Supplies Mfg</p>	<p>444130 Hardware Stores</p>
<p>238300 Building Finishing Contractors (including drywall, insulation,</p>			<p>444190 Other Building Material Dealers</p>
			<p>444200 Lawn &amp; Garden Equipment &amp; Supplies Stores</p>

<p><b>Food and Beverage Stores</b> 445110 Supermarkets and Other Grocery (except Convenience) Stores 445120 Convenience Stores 445210 Meat Markets 445220 Fish &amp; Seafood Markets 445230 Fruit &amp; Vegetable Markets 445291 Baked Goods Stores 445292 Confectionery &amp; Nut Stores 445299 All Other Specialty Food Stores 445310 Beer, Wine, &amp; Liquor Stores</p> <p><b>Health and Personal Care Stores</b> 446110 Pharmacies &amp; Drug Stores 446120 Cosmetics, Beauty Supplies, &amp; Perfume Stores 446130 Optical Goods Stores 446190 Other Health &amp; Personal Care Stores</p> <p><b>Gasoline Stations</b> 447100 Gasoline Stations (including convenience stores with gas)</p> <p><b>Clothing and Clothing Accessories Stores</b> 448110 Men's Clothing Stores 448120 Women's Clothing Stores 448130 Children's &amp; Infants' Clothing Stores 448140 Family Clothing Stores 448150 Clothing Accessories Stores 448190 Other Clothing Stores 448210 Shoe Stores 448310 Jewelry Stores 448320 Luggage &amp; Leather Goods Stores</p> <p><b>Sporting Goods, Hobby, Book, and Music Stores</b> 451110 Sporting Goods Stores 451120 Hobby, Toy, &amp; Game Stores 451130 Sewing, Needlework, &amp; Piece Goods Stores 451140 Musical Instrument &amp; Supplies Stores 451211 Book Stores 451212 News Dealers &amp; Newsstands</p> <p><b>General Merchandise Stores</b> 452200 Department Stores 452300 General Merchandise Stores, incl. Warehouse Clubs and Supercenters</p> <p><b>Miscellaneous Store Retailers</b> 453110 Florists 453210 Office Supplies &amp; Stationery Stores 453220 Gift, Novelty, &amp; Souvenir Stores 453310 Used Merchandise Stores 453910 Pet &amp; Pet Supplies Stores 453920 Art Dealers 453930 Manufactured (Mobile) Home Dealers 453990 All Other Miscellaneous Store Retailers (including tobacco, candle, &amp; trophy shops)</p> <p><b>Nonstore Retailers</b> 454110 Electronic Shopping &amp; Mail-Order Houses 454210 Vending Machine Operators 454310 Fuel Dealers (including Heating Oil and Liquefied Petroleum) 454390 Other Direct Selling Establishments (including door-to-door retailing, frozen food plan providers, party plan merchandisers, &amp; coffee-break service providers)</p>	<p>485320 Limousine Service 485410 School &amp; Employee Bus Transportation 485510 Charter Bus Industry 485990 Other Transit &amp; Ground Passenger Transportation</p> <p><b>Pipeline Transportation</b> 486000 Pipeline Transportation</p> <p><b>Scenic &amp; Sightseeing Transportation</b> 487000 Scenic &amp; Sightseeing Transportation</p> <p><b>Support Activities for Transportation</b> 488100 Support Activities for Air Transportation 488210 Support Activities for Rail Transportation 488300 Support Activities for Water Transportation 488410 Motor Vehicle Towing 488490 Other Support Activities for Road Transportation 488510 Freight Transportation Arrangement 488990 Other Support Activities for Transportation</p> <p><b>Couriers and Messengers</b> 492110 Couriers 492210 Local Messengers &amp; Local Delivery</p> <p><b>Warehousing and Storage</b> 493100 Warehousing &amp; Storage (except lessors of mini-warehouses &amp; self-storage units)</p> <p><b>Information</b> <b>Publishing Industries (except Internet)</b> 511110 Newspaper Publishers 511120 Periodical Publishers 511130 Book Publishers 511140 Directory &amp; Mailing List Publishers 511190 Other Publishers 511210 Software Publishers</p> <p><b>Motion Picture and Sound Recording Industries</b> 512100 Motion Picture &amp; Video Industries (except video rental) 512200 Sound Recording Industries</p> <p><b>Broadcasting (except Internet)</b> 515100 Radio &amp; Television Broadcasting 515210 Cable &amp; Other Subscription Programming</p> <p><b>Telecommunications</b> 517000 Telecommunications (including paging, cellular, satellite, cable &amp; other program distribution, resellers, &amp; other telecommunications, and Internet service providers)</p> <p><b>Data Processing Services</b> 518210 Data Processing, Hosting, &amp; Related Services</p> <p><b>Other Information Services</b> 519100 Other Information Services (including news syndicates &amp; libraries, Internet publishing &amp; broadcasting)</p>	<p><b>Securities, Commodity Contracts, and Other Financial Investments and Related Activities</b> 523110 Investment Banking &amp; Securities Dealing 523120 Securities Brokerage 523130 Commodity Contracts Dealing 523140 Commodity Contracts Brokerage 523210 Securities &amp; Commodity Exchanges 523900 Other Financial Investment Activities (including portfolio management &amp; investment advice)</p> <p><b>Insurance Carriers and Related Activities</b> 524140 Direct Life, Health, &amp; Medical Insurance &amp; Reinsurance Carriers 524150 Direct Insurance &amp; Reinsurance (except Life, Health &amp; Medical) Carriers 524210 Insurance Agencies &amp; Brokerages 524290 Other Insurance Related Activities (including third-party administration of insurance and pension funds)</p> <p><b>Funds, Trusts, and Other Financial Vehicles</b> 525100 Insurance &amp; Employee Benefit Funds 525910 Open-End Investment Funds (Form 1120-RIC, U.S. Income Tax Return for Regulated Investment Companies) 525920 Trusts, Estates, &amp; Agency Accounts 525990 Other Financial Vehicles (including mortgage REITs and closed-end investment funds) "Offices of Bank Holding Companies" and "Offices of Other Holding Companies" are located under <b>Management of Companies (Holding Companies)</b> below.</p>	<p>541213 Tax Preparation Services 541214 Payroll Services 541219 Other Accounting Services</p> <p><b>Architectural, Engineering, and Related Services</b> 541310 Architectural Services 541320 Landscape Architecture Services 541330 Engineering Services 541340 Drafting Services 541350 Building Inspection Services 541360 Geophysical Surveying &amp; Mapping Services 541370 Surveying &amp; Mapping (except Geophysical) Services 541380 Testing Laboratories</p> <p><b>Specialized Design Services</b> 541400 Specialized Design Services (including interior, industrial, graphic, &amp; fashion design)</p> <p><b>Computer Systems Design and Related Services</b> 541511 Custom Computer Programming Services 541512 Computer Systems Design Services 541513 Computer Facilities Management Services 541519 Other Computer Related Services</p> <p><b>Other Professional, Scientific, and Technical Services</b> 541600 Management, Scientific, &amp; Technical Consulting Services 541700 Scientific Research &amp; Development Services 541800 Advertising &amp; Related Services 541910 Marketing Research &amp; Public Opinion Polling 541920 Photographic Services 541930 Translation &amp; Interpretation Services 541940 Veterinary Services 541990 All Other Professional, Scientific, &amp; Technical Services</p>
<p><b>Transportation and Warehousing</b> <b>Air, Rail, and Water Transportation</b> 481000 Air Transportation 482110 Rail Transportation 483000 Water Transportation</p> <p><b>Truck Transportation</b> 484110 General Freight Trucking, Local 484120 General Freight Trucking, Long-distance 484200 Specialized Freight Trucking</p> <p><b>Transit and Ground Passenger Transportation</b> 485110 Urban Transit Systems 485210 Interurban &amp; Rural Bus Transportation 485310 Taxi Service</p>	<p><b>Finance and Insurance</b> <b>Depository Credit Intermediation</b> 522110 Commercial Banking 522120 Savings Institutions 522130 Credit Unions 522190 Other Depository Credit Intermediation</p> <p><b>Nondepository Credit Intermediation</b> 522210 Credit Card Issuing 522220 Sales Financing 522291 Consumer Lending 522292 Real Estate Credit (including mortgage bankers &amp; originators) 522293 International Trade Financing 522294 Secondary Market Financing 522298 All Other Nondepository Credit Intermediation</p> <p><b>Activities Related to Credit Intermediation</b> 522300 Activities Related to Credit Intermediation (including loan brokers, check clearing, &amp; money transmitting)</p>	<p><b>Real Estate and Rental and Leasing</b> <b>Real Estate</b> 531110 Lessors of Residential Buildings &amp; Dwellings (including equity REITs) 531120 Lessors of Nonresidential Buildings (except Mini-warehouses) (including equity REITs) 531130 Lessors of Mini-warehouses &amp; Self-Storage Units (including equity REITs) 531190 Lessors of Other Real Estate Property (including equity REITs) 531210 Offices of Real Estate Agents &amp; Brokers 531310 Real Estate Property Managers 531320 Offices of Real Estate Appraisers 531390 Other Activities Related to Real Estate</p> <p><b>Rental and Leasing Services</b> 532100 Automotive Equipment Rental &amp; Leasing 532210 Consumer Electronics &amp; Appliances Rental 532281 Formal Wear &amp; Costume Rental 532282 Video Tape &amp; Disc Rental 532283 Home Health Equipment Rental 532284 Recreational Goods Rental 532289 All Other Consumer Goods Rental 532310 General Rental Centers 532400 Commercial &amp; Industrial Machinery &amp; Equipment Rental &amp; Leasing</p> <p><b>Lessors of Nonfinancial Intangible Assets (except copyrighted works)</b> 533110 Lessors of Nonfinancial Intangible Assets (except copyrighted works)</p>	<p><b>Management of Companies (Holding Companies)</b> 551111 Offices of Bank Holding Companies 551112 Offices of Other Holding Companies</p> <p><b>Administrative and Support and Waste Management and Remediation Services</b> <b>Administrative and Support Services</b> 561110 Office Administrative Services 561210 Facilities Support Services 561300 Employment Services 561410 Document Preparation Services 561420 Telephone Call Centers 561430 Business Service Centers (including private mail centers &amp; copy shops) 561440 Collection Agencies 561450 Credit Bureaus 561490 Other Business Support Services (including repossession services, court reporting, &amp; stenotype services) 561500 Travel Arrangement &amp; Reservation Services 561600 Investigation &amp; Security Services 561710 Exterminating &amp; Pest Control Services 561720 Janitorial Services 561730 Landscaping Services 561740 Carpet &amp; Upholstery Cleaning Services 561790 Other Services to Buildings &amp; Dwellings 561900 Other Support Services (including packaging &amp; labeling services, &amp; convention &amp; trade show organizers)</p>
		<p><b>Professional, Scientific, and Technical Services</b> <b>Legal Services</b> 541110 Offices of Lawyers 541190 Other Legal Services</p> <p><b>Accounting, Tax Preparation, Bookkeeping, and Payroll Services</b> 541211 Offices of Certified Public Accountants</p>	<p><b>Waste Management and Remediation Services</b> 562000 Waste Management &amp; Remediation Services</p> <p><b>Educational Services</b> 611000 Educational Services (including schools, colleges, &amp; universities)</p>

<p><b>Health Care and Social Assistance</b></p> <p><b>Offices of Physicians and Dentists</b></p> <p>621111 Offices of Physicians (except mental health specialists)</p> <p>621112 Offices of Physicians, Mental Health Specialists</p> <p>621210 Offices of Dentists</p> <p><b>Offices of Other Health Practitioners</b></p> <p>621310 Offices of Chiropractors</p> <p>621320 Offices of Optometrists</p> <p>621330 Offices of Mental Health Practitioners (except Physicians)</p> <p>621340 Offices of Physical, Occupational &amp; Speech Therapists, &amp; Audiologists</p> <p>621391 Offices of Podiatrists</p> <p>621399 Offices of All Other Miscellaneous Health Practitioners</p> <p><b>Outpatient Care Centers</b></p> <p>621410 Family Planning Centers</p> <p>621420 Outpatient Mental Health &amp; Substance Abuse Centers</p> <p>621491 HMO Medical Centers</p> <p>621492 Kidney Dialysis Centers</p> <p>621493 Freestanding Ambulatory Surgical &amp; Emergency Centers</p> <p>621498 All Other Outpatient Care Centers</p> <p><b>Medical and Diagnostic Laboratories</b></p> <p>621510 Medical &amp; Diagnostic Laboratories</p> <p><b>Home Health Care Services</b></p> <p>621610 Home Health Care Services</p> <p><b>Other Ambulatory Health Care Services</b></p> <p>621900 Other Ambulatory Health Care Services (including ambulance services &amp; blood &amp; organ banks)</p>	<p><b>Hospitals</b></p> <p>622000 Hospitals</p> <p><b>Nursing and Residential Care Facilities</b></p> <p>623000 Nursing &amp; Residential Care Facilities</p> <p><b>Social Assistance</b></p> <p>624100 Individual &amp; Family Services</p> <p>624200 Community Food &amp; Housing, &amp; Emergency &amp; Other Relief Services</p> <p>624310 Vocational Rehabilitation Services</p> <p>624410 Child Day Care Services</p> <p><b>Arts, Entertainment, and Recreation</b></p> <p><b>Performing Arts, Spectator Sports, and Related Industries</b></p> <p>711100 Performing Arts Companies</p> <p>711210 Spectator Sports (including sports clubs &amp; racetracks)</p> <p>711300 Promoters of Performing Arts, Sports, &amp; Similar Events</p> <p>711410 Agents &amp; Managers for Artists, Athletes, Entertainers, &amp; Other Public Figures</p> <p>711510 Independent Artists, Writers, &amp; Performers</p> <p><b>Museums, Historical Sites, and Similar Institutions</b></p> <p>712100 Museums, Historical Sites, &amp; Similar Institutions</p> <p><b>Amusement, Gambling, and Recreation Industries</b></p> <p>713100 Amusement Parks &amp; Arcades</p> <p>713200 Gambling Industries</p> <p>713900 Other Amusement &amp; Recreation Industries (including golf courses, skiing facilities,</p>	<p>marinas, fitness centers, &amp; bowling centers)</p> <p><b>Accommodation and Food Services</b></p> <p><b>Accommodation</b></p> <p>721110 Hotels (except Casino Hotels) &amp; Motels</p> <p>721120 Casino Hotels</p> <p>721191 Bed &amp; Breakfast Inns</p> <p>721199 All Other Traveler Accommodation</p> <p>721210 RV (Recreational Vehicle) Parks &amp; Recreational Camps</p> <p>721310 Rooming &amp; Boarding Houses, Dormitories &amp; Workers' Camps</p> <p><b>Food Services and Drinking Places</b></p> <p>722300 Special Food Services (including food service contractors &amp; caterers)</p> <p>722410 Drinking Places (Alcoholic Beverages)</p> <p>722511 Full Service Restaurants</p> <p>722513 Limited Service Restaurants</p> <p>722514 Cafeterias &amp; Buffets</p> <p>722515 Snack &amp; Nonalcoholic Beverage Bars</p> <p><b>Other Services</b></p> <p><b>Repair and Maintenance</b></p> <p>811110 Automotive Mechanical &amp; Electrical Repair &amp; Maintenance</p> <p>811120 Automotive Body, Paint, Interior, &amp; Glass Repair</p> <p>811190 Other Automotive Repair &amp; Maintenance (including oil change &amp; lubrication shops &amp; car washes)</p> <p>811210 Electronic &amp; Precision Equipment Repair &amp; Maintenance</p> <p>811310 Commercial &amp; Industrial Machinery &amp; Equipment (except</p>	<p>Automotive &amp; Electronic) Repair &amp; Maintenance</p> <p>811410 Home &amp; Garden Equipment &amp; Appliance Repair &amp; Maintenance</p> <p>811420 Reupholstery &amp; Furniture Repair</p> <p>811430 Footwear &amp; Leather Goods Repair</p> <p>811490 Other Personal &amp; Household Goods Repair &amp; Maintenance</p> <p><b>Personal and Laundry Services</b></p> <p>812111 Barber Shops</p> <p>812112 Beauty Salons</p> <p>812113 Nail Salons</p> <p>812190 Other Personal Care Services (including diet &amp; weight reducing centers)</p> <p>812210 Funeral Homes &amp; Funeral Services</p> <p>812220 Cemeteries &amp; Crematories</p> <p>812310 Coin-Operated Laundries &amp; Drycleaners</p> <p>812320 Drycleaning &amp; Laundry Services (except Coin-Operated)</p> <p>812330 Linen &amp; Uniform Supply</p> <p>812910 Pet Care (except Veterinary) Services</p> <p>812920 Photofinishing</p> <p>812930 Parking Lots &amp; Garages</p> <p>812990 All Other Personal Services</p> <p><b>Religious, Grantmaking, Civic, Professional, and Similar Organizations</b></p> <p>813000 Religious, Grantmaking, Civic, Professional, &amp; Similar Organizations (including condominium and homeowners associations)</p>
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