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SCHEDULE E (Form 5471)

(Rev. December 2021) Department of the Treasury Internal Revenue Service

Income, War Profits, and Excess Profits Taxes Paid or Accrued

Attach to Form 5471.

Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471, Identifying number, Name of foreign corporation, EIN (if any), Reference ID number, a Separate Category, b If code 901j, c If one of the RBT codes.

Part I Taxes for Which a Foreign Tax Credit Is Allowed Section 1 - Taxes Paid or Accrued Directly by Foreign Corporation

Table with 7 columns: (a) Name of Payor Entity, (b) EIN or Reference ID Number, (c) Unsuspended Taxes, (d) Country or U.S. Possession, (e) Foreign Tax Year, (f) U.S. Tax Year, (g) Income Subject to Tax, (h) If taxes are paid, (i) Local Currency, (j) Tax Paid or Accrued, (k) Conversion Rate, (l) In U.S. Dollars, (m) In Functional Currency.

Section 2 - Taxes Deemed Paid by Foreign Corporation

Table with 5 columns: (a) Name of Lower-Tier Distributing Foreign Corporation, (b) EIN or Reference ID Number, (c) Country or U.S. Possession, (d) PTEP Group, (e) Annual PTEP Account, (f) PTEP Distributed, (g) Total Amount of PTEP, (h) Total Amount of PTEP Group Taxes, (i) Foreign Income Taxes Properly Attributable.

Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
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- a** Separate Category (Enter code—see instructions.) ▶ _____
- b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶ _____
- c** If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶ _____

Part II Election

For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment?
 Yes No If "Yes," state date of election ▶ _____

Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901(m)	(f) U.S. Taxes	(g) Suspended Taxes	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2) ▶ _____								
4	In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions)) ▶ _____								

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation

IMPORTANT: Enter amounts in U.S. dollars.		Taxes related to:			
		(a) Subpart F Income	(b) Tested Income	(c) Residual Income	(d) Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1)	-0-	-0-	-0-	
b	Beginning balance adjustments (attach statement)				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination				
3a	Taxes unsuspending under anti-splitter rules				
b	Taxes suspended under anti-splitter rules				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)				
5	Taxes carried over in nonrecognition transactions				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i)				
7	Other adjustments (attach statement)				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)				
9	Taxes deemed paid with respect to inclusions (see instructions)				
10	Taxes deemed paid with respect to actual distributions				
11	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
12	Other (attach statement)				
13	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))				
14	Reserved for future use				
15	Reduction for other taxes not deemed paid				
16	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12	-0-	-0-	-0-	

Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
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- a** Separate Category (Enter code—see instructions.) ▶ _____
- b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶ _____
- c** If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶ _____

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued)

	(e) Taxes related to previously taxed E&P (see instructions)									
	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a										
b										
c										
2										
3a										
b										
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5										
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