

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

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Most forms and publications have a page on IRS.gov: <a href="IRS.gov/Form1040">IRS.gov/Form1040</a> for Form 1040; <a href="IRS.gov/Pub501">IRS.gov/Pub501</a> for Pub. 501; <a href="IRS.gov/W4">IRS.gov/W4</a> for Form W-4; and <a href="IRS.gov/ScheduleA">IRS.gov/ScheduleA</a> for Schedule A (Form 1040), for example, and similarly for other forms, pubs, and schedules for Form 1040. When typing in a link, type it into the address bar of your browser, not a Search box on IRS.gov.

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## **SCHEDULE H** (Form 1120-F)

Name of corporation

Department of the Treasury Internal Revenue Service

## Deductions Allocated to Effectively Connected Income Under Regulations Section 1.861-8

Attach to Form 1120-F.

Go to www.irs.gov/Form1120F for instructions and the latest information.

OMB No. 1545-0123

Employer identification number

Part	Home Office Deductible Expenses Definitely Related Solely to ECI or Non-ECI Note: Enter all amounts on lines 1a through 13 in only U.S. dollars or in only functional currency. If U.S. dollars Otherwise, specify currency:	, check b	ox □.	
1a b	Total expenses on the books of the home office			
	U.S. GAAP Home Country GAAP			
	☐ IFRS ☐ Other (specify):			
2	Adjustments for U.S. tax principles (attach statement – see instructions) 2			
3	Total deductible expenses on the books of the home office. Combine lines 1a and 2	3		
4	Interest expense included on line 3	-		
5	Bad debt expense included on line 3			
6	Total of interest expense and bad debt expense. Add lines 4 and 5	7		
7 8	Remaining deductible expenses to be allocated and apportioned between ECI and non-ECI. Subtract line 6 from line 3  Deductible expenses definitely related solely to non-ECI from subsidiaries   8			
9	Deductible expenses definitely related solely to other non-ECI booked in the home country  9	-		
10	Deductible expenses definitely related solely to other non-ECI booked in other			
	countries (including the United States)			
11	Deductible expenses definitely related solely to ECI			
12	Total deductible expenses definitely related solely to ECI or non-ECI. Add lines 8 through 11	12		
Part	Note: Enter the amounts on lines 15 through 20 in U.S. dollars.			
13	Remaining deductible expenses on the books of the home office not definitely related solely to ECI or			
	non-ECI. Subtract line 12 from line 7	13		
14	Average exchange rate used to convert amounts to U.S. dollars (see instructions)	14 15		
15 16	Enter the amount from line 13. If line 13 is stated in functional currency, divide line 13 by line 14 Remaining home office deductible expenses on line 15 allocated and apportioned under Regulations	15		
10	section 1.861-8 to ECI (attach computation)	16		
17	Enter the amount from line 11. If line 11 is stated in functional currency, divide line 11 by line 14	17		
18	Total home office deductible expenses allocated and apportioned to ECI. Add lines 16 and 17	18		
19	Total deductible expenses from other non-U.S. locations allocated and apportioned to ECI	19		
20	Total deductible expenses allocated and apportioned to ECI. Add lines 18 and 19 and enter the			
	amount here and on Form 1120-F, Section II, line 26	20		
Part		arts I a	nd II	
	Note: Enter the amounts in Part III, lines 21a, 21b, 22a, and 22b in U.S. dollars.			
	ne or more methods used are different than in prior year, check box		 - Cabaa	. 📙
	y amount on line 20 is recorded as an interbranch amount on books and records used to prepare Forr clude the amount on Part IV, line 35 and check this box			
21	Gross income ratio:		• • •	<u>· ⊔</u>
a a	Gross ECI			
b	Worldwide gross income	-		
С	Divide line 21a by line 21b	21c		%
22	Asset ratio:			
а	Average U.S. assets from Schedule I, line 5, column (d)			
b	Worldwide assets (if applicable, from Schedule I, line 6b)			
С	Divide line 22a by line 22b	22c		<u>%</u>
23	Number of personnel ratio:			
а	Personnel of U.S. trade or business			
b	Worldwide personnel	00		
C 24	Divide line 23a by line 23b	23c	V	<u>%</u>
24	Parts I and II? If "Yes," attach statement (see instructions)		Yes	No
25	Did the corporation use any other methods (e.g., time-spent analysis or estimates) in Parts I and II? I attach statement (see instructions)	f "Yes,"		

Schedule H (Form 1120-F) 2023

## Part III Allocation and Apportionment Methods and Financial Records Used to Complete Parts I and II (continued)

**Note:** Indicate whether the corporation used any of the following financial and other records in Parts I and II to identify deductible expenses allocated and apportioned to ECI.

26a b 27 28	Published or other non-public audited financial statements			es) (attach stateme		Yes	No
Part	Allocation and Apportionment of Expenses on Books and I Note: Enter all amounts in Part IV in U.S. dollars.	Recor	ds Used to Prepa	re Form 1120-F,	Schedu	le L	
29	Total expenses per books and records used to prepare For Schedule L	m 11	20-F, <b>29</b>	IS			
30	Adjustments for U.S. tax principles (attach statement – see instructi	ons)	30				
31	Total deductible expenses. Combine lines 29 and 30		3 · A · C	31			
32a	Third-party interest expense included on line 31		32a				
b	Interbranch interest expense included on line 31		<b>32</b> b				
33 34	Bad debt expense included on line 31			2			
35 36	Interbranch expenses per books and records included on line 3 included on line 3 (attach statement)	31 an	d not	36			
37	Deductible expenses on books and records allocated and appo		d to ECI or non				
	Regulations section 1.861-8. Subtract line 36 from line 31						
	Reconciliation of allocation and apportionment of deductible expenses to ECI and non-ECI on books and records under Regulations section 1.861-8 (from line 37)		(a) ECI Amounts	(b) Non-ECI Amounts	Total: Ac	(c) Id colu and (b)	
38a	Derivative transaction deductible expenses definitely related to ECI or non-ECI under Regulations section 1.861-8 (from line 37)	38a					
b	Other deductible expenses definitely related to ECI or non-ECI (from line 37)	38b					
39	Total deductible expenses definitely related to ECI or non-ECI. Add lines 38a and 38b	39					
40	Other deductible expenses on books and records not definitely related to ECI or non-ECI that are allocated and apportioned to ECI and non-ECI (from line 37)	40					
41	Total deductible expenses on books and records allocated and apportioned to ECI and non-ECI. Add lines 39 and 40. Column (c) must equal line 37	41					
	$\mbox{\bf Note:}$ Line 41, column (a) is the total of the deductions reported on 24, and 27.	Form	1120-F, Section II	, lines 12, 13, 14,	16, 17, 1	9 thr	ough