

SCHEDULE H (Form 1120-F)

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

OMB No. 1545-0123

Department of the Treasury Internal Revenue Service

Attach to Form 1120-F.

2024

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

Name of corporation

Employer identification number

Part I 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, check box [] Otherwise, specify currency:

Table with 12 rows for Part I. Columns include line numbers (1a-12), descriptions of expenses, and input fields for amounts. Includes sub-sections for accounting conventions (U.S. GAAP, Home Country GAAP, IFRS, Other) and adjustments for U.S. tax principles.

Part II Home Office Deductible Expenses Allocated and Apportioned to ECI

Note: Enter the amounts on lines 15 through 20 in U.S. dollars.

Table with 8 rows for Part II. Columns include line numbers (13-20), descriptions of allocation and apportionment steps, and input fields for amounts.

Part III Allocation and Apportionment Methods and Financial Records Used to Complete Parts I and II

Note: Enter the amounts in Part III, lines 21a, 21b, 22a, and 22b in U.S. dollars.

Table with 10 rows for Part III. Includes checkboxes for method changes and interbranch amounts. Rows 21-23 contain ratio calculations for Gross Income, Asset, and Personnel. Row 24 asks about ratio-based methods, and row 25 asks about other methods.

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.

	Yes	No
26a Published or other non-public audited financial statements		
b Non-audited financial statements		
27 Home office management or other departmental cost accounting reports		
28 Other (e.g., home country regulatory reports or written, contemporaneous functional analyses) (attach statement)		

Part IV Allocation and Apportionment of Expenses on Books and Records Used to Prepare Form 1120-F, Schedule L

Note: Enter all amounts in Part IV in U.S. dollars.

29 Total expenses per books and records used to prepare Form 1120-F, Schedule L	29		
30 Adjustments for U.S. tax principles (attach statement – see instructions)	30		
31 Total deductible expenses. Combine lines 29 and 30			31
32a Third-party interest expense included on line 31	32a		
b Interbranch interest expense included on line 31	32b		
33 Bad debt expense included on line 31	33		
34 Other third-party deductible expenses not allocated or apportioned to ECI and non-ECI under Regulations section 1.861-8 included on line 31 (attach statement)	34		
35 Interbranch expenses per books and records included on line 31 and not included on line 32b (attach statement)	35		
36 Add lines 32a through 35			36
37 Deductible expenses on books and records allocated and apportioned to ECI or non-ECI under Regulations section 1.861-8. Subtract line 36 from line 31			37

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April 10, 2024

	(a) ECI Amounts	(b) Non-ECI Amounts	(c) Total: Add columns (a) and (b)
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)			
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		

Note: Line 41, column (a) is the total of the deductions reported on Form 1120-F, Section II, lines 12, 13, 14, 16, 17, 19 through 24, and 27.