

**SCHEDULE P  
(Form 5471)**

(Rev. December 2020)

Department of the Treasury  
Internal Revenue Service

**Previously Taxed Earnings and Profits of U.S. Shareholder  
of Certain Foreign Corporations**

▶ Attach to Form 5471.

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

OMB No. 1545-0123

Name of person filing Form 5471		Identifying number
Name of U.S. shareholder		Identifying number
Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)

- 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) . . . . . ▶ \_\_\_\_\_

**Part I Previously Taxed E&P in Functional Currency** (see instructions)

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
<b>1a</b>	Balance at beginning of year (see instructions) . . . . .			
<b>b</b>	Beginning balance adjustments (attach statement) . . . . .			
<b>c</b>	Adjusted beginning balance (combine lines 1a and 1b) . . . . .			
<b>2</b>	Reduction for taxes unsuspended under anti-splitter rules . . . . .			
<b>3</b>	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation			
<b>4</b>	Previously taxed E&P carried over in nonrecognition transaction . . . . .			
<b>5</b>	Other adjustments (attach statement) . . . . .			
<b>6</b>	Total previously taxed E&P (combine lines 1c through 5) . . . . .			
<b>7</b>	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P . . . . .			
<b>8</b>	Actual distributions of previously taxed E&P . . . . .			
<b>9</b>	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P . . . . .			
<b>10</b>	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions) . . . . .			
<b>11</b>	Other adjustments (attach statement) . . . . .			
<b>12</b>	Balance at beginning of next year (combine lines 6 through 11) . . . . .			

**Part I** **Previously Taxed E&P in Functional Currency** (see instructions) *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
<b>1a</b>								
<b>b</b>								
<b>c</b>								
<b>2</b>								
<b>3</b>								
<b>4</b>								
<b>5</b>								
<b>6</b>								
<b>7</b>								
<b>8</b>								
<b>9</b>								
<b>10</b>								
<b>11</b>								
<b>12</b>								

**Part II** Previously Taxed E&P in U.S. Dollars

		(a) Reclassified section 965(a) PTEP	(b) Reclassified section 965(b) PTEP	(c) General section 959(c)(1) PTEP
<b>1a</b>	Balance at beginning of year (see instructions) . . . . .			
<b>b</b>	Beginning balance adjustments (attach statement) . . . . .			
<b>c</b>	Adjusted beginning balance (combine lines 1a and 1b) . . . . .			
<b>2</b>	Reduction for taxes unsuspended under anti-splitter rules . . . . .			
<b>3</b>	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation . . . . .			
<b>4</b>	Previously taxed E&P carried over in nonrecognition transaction . . . . .			
<b>5</b>	Other adjustments (attach statement) . . . . .			
<b>6</b>	Total previously taxed E&P (combine lines 1c through 5) . . . . .			
<b>7</b>	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P . . . . .			
<b>8</b>	Actual distributions of previously taxed E&P . . . . .			
<b>9</b>	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P . . . . .			
<b>10</b>	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions) . . . . .			
<b>11</b>	Other adjustments (attach statement) . . . . .			
<b>12</b>	Balance at beginning of next year (combine lines 6 through 11) . . . . .			

**Part II** Previously Taxed E&P in U.S. Dollars *(continued)*

	(d) Reclassified section 951A PTEP	(e) Reclassified section 245A(d) PTEP	(f) Section 965(a) PTEP	(g) Section 965(b) PTEP	(h) Section 951A PTEP	(i) Section 245A(d) PTEP	(j) Section 951(a)(1)(A) PTEP	(k) Total
<b>1a</b>								
<b>b</b>								
<b>c</b>								
<b>2</b>								
<b>3</b>								
<b>4</b>								
<b>5</b>								
<b>6</b>								
<b>7</b>								
<b>8</b>								
<b>9</b>								
<b>10</b>								
<b>11</b>								
<b>12</b>								