

SUPPORTING STATEMENT  
FOR THE PAPERWORK REDUCTION ACT INFORMATION COLLECTION  
FOR FORM 18-K

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

One of the purposes of the Securities Exchange Act of 1934 (the “Exchange Act”) is to help ensure that secondary markets for publicly traded securities are fair and honest. One method by which the Exchange Act carries out this purpose is by requiring issuers that have securities listed on a national securities exchange to file periodic reports with the Commission. Issuer periodic reporting requirements are prescribed by the Securities and Exchange Commission (“Commission”) pursuant to its authority in Section 13(a) of the Exchange Act. The Commission exercised its authority under Section 13(a) to establish a periodic reporting system for foreign governments and political subdivisions. The system is only applicable with respect to issuers with securities registered on national securities exchanges under Section 12(b) of the Exchange Act. Form 18-K (17 CFR 249.318) is an annual report that is filed by foreign governments or political subdivisions of foreign governments that have securities that are listed on a national securities exchange.

2. Purpose and Use of the Information Collection

Form 18-K elicits disclosure of information concerning the listed securities of a foreign government or political subdivision of a foreign government, including external and internal debt, receipts and expenditures, foreign exchange controls, imports and exports, and balance of payments. A copy of the issuer’s latest annual budget is required to be filed as well. In requiring such information, Form 18-K helps to ensure that relevant information about the issuer is available and updated annually and can help to confirm the accuracy of previously disclosed information.

3. Consideration Given to Information Technology

Form 18-K is filed electronically using the Commission’s Electronic Data Gathering, Analysis and Retrieval (“EDGAR”) system.

4. Duplication of Information

Although the statistical data published by each foreign government differs from country to country, the Commission is not aware of any government that issues securities in this country that does not make public the data required by Form 18-K. The form, however, presents the data, otherwise available from a variety of sources, in one cohesive document.

5. Reducing the Burden on Small Entities

Form 18-K is not filed by small entities because it is an annual report form filed by foreign governments or political subdivisions of foreign governments with securities listed on a United States exchange.

6. Consequences of Not Conducting Collection

Form 18-K is required to be filed annually. Not requiring Form 18-K to be filed, or requiring it be filed any less frequently, would deprive investors of the information protection of the Exchange Act with respect to listed securities of foreign governments or political subdivisions thereof.

7. Special Circumstances

There are no special circumstances.

8. Consultations with Persons Outside the Agency

No comments were received for this request during the 60-day comment period prior to OMB's review of this submission.

9. Payment or Gift to Respondents

No payment or gift to respondents.

10. Confidentiality

Form 18-K is a public document.

11. Sensitive Questions

No information of a sensitive nature, including social security numbers, will be required under this collection of information. The information collection collects basic Personally Identifiable Information (PII) that may include name, job title, work telephone number and work address. However, the agency has determined that the information collection does not constitute a system of record for purposes of the Privacy Act. Information is not retrieved by a personal identifier. In accordance with Section 208 of the E-Government Act of 2002, the agency has conducted a Privacy Impact Assessment (PIA) of the EDGAR system, in connection with this collection of information. The EDGAR PIA, published on March 6, 2025, is provided as a supplemental document and is also available at <https://www.sec.gov/privacy>.

12. Estimate of Respondent Reporting Burden

**Estimated Reporting Burden**

Information Collection Title	OMB Control Number	Number of Responses	Burden Hours
Form 18-K	3235-0120	37	296

For purposes of the Paperwork Reduction Act (“PRA”), we estimate that Form 18-K takes approximately 8 hours per response to comply with the collection of information requirements and is filed once per year by an average of 37 respondents annually, for an average total of 37 responses annually (calculated for the period 2022 through 2024). We further estimate that 100% of the collection of information burden is carried internally by the issuer. Thus, we estimate the total annual reporting burden to be 296 hours (8 hours per response x 37 responses).

We derived our burden hour estimates by estimating the average number of hours it would take an issuer to compile the necessary information and data, prepare and review disclosure, file documents and retain records. In connection with rule amendments to the form, we occasionally receive PRA estimates from public commenters about incremental burdens that are used in our burden estimates. We believe that the actual burdens will likely vary among individual companies based on the size and complexity of their organization and the nature of their operations. The burden hours estimate is made solely for the purpose of the PRA.

13. Estimate of Total Annualized Cost Burden

We estimate that there is no cost associated with this information collection because 100% of the burden is carried internally by the issuer.

14. Costs to Federal Government

The SEC is in the process of revising its methodologies to estimate annualized costs to the Federal government for all its relevant collections of information. The SEC anticipates that future extensions of this collection of information will reflect the revised methodologies.

15. Reason for Change in Burden

**Estimated Burden Hours Adjustment**

Information Collection Title	OMB Control Number	Burden Hours Adjustment
Form 18-K	3235-0120	(8)

The decrease in burden of 8 hours is due to a decrease in the estimated number of Form 18-Ks filed with the Commission annually (from 38 to 37).

16. Information Collection Planned for Statistical Purposes

The information collection does not employ statistical methods.

17. Approval to Omit OMB Expiration Date

We request authorization to omit the expiration date on the electronic version of the form. Including the expiration date on the electronic version of the form will result in increased costs, because the need to make changes to the form may not follow the application's scheduled version release dates. The OMB control number will be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to certification for PRA submissions.

B. STATISTICAL METHODS

The information collection does not employ statistical methods.