

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

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# Form 1118

Name of corporation

A B C

(Rev. December 2022)
Department of the Treasury
Internal Revenue Service

### Foreign Tax Credit—Corporations

Attach to the corporation's tax return.

Go to www.irs.gov/Form1118 for instructions and the latest information.

For calendar year 20 , or other tax year beginning , 20 , and ending

OMB No. 1545-0123

Attachment Sequence No. **118** 

**Employer identification number** 

Use a separate Form 1118 for each applicable category of income (see instructions). a Separate Category (Enter code—see instructions.) . . . 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 A Income or (Loss) Before Adjustments (Report all amounts in U.S. dollars. See Specific Instructions. Gross Income or (Loss) From Sources Outside the United States 2. Foreign Country or U.S. Possession 1. EIN or Reference ID Number 3. Inclusions Under Sections 951(a)(1) and 951A (enter two-letter code-4. Dividends (see instructions)\* (see instructions) 5. Interest use a separate line for (see instructions) each) (see instructions) (b) Gross-Up (section 78) (a) Exclude Gross-Up Α В С Totals (add lines A through C) **12.** Total 6. Gross Rents, Royalties, 8. Gross Income From 10. Currency Gain Code 11. Other 7. Sales 9. Currency Gain (add columns 3(a) and License Fees Performance of Services (see instructions) (attach schedule) through 9 and 11) Α В С Totals 13. Allocable Deductions Rental, Royalty, and Licensing Expenses (a) Dividends (b) Deduction Allowed Under (c) Deduction Allowed Under (g) Expenses Allocable (f) Expenses Allocable Received Deduction Section 250(a)(1)(A) - Foreign Section 250(a)(1)(B)-Global to Gross Income From (d) Depreciation, Depletion, (e) Other Allocable to Sales Income (see instructions) Derived Intangible Income Intangible Low-Taxed Income Performance of Services and Amortization Expenses Α В С Totals 14. Apportioned Share 13. Allocable Deductions (continued) of Deductions (enter amount 17. Total Income or (Loss) 16. Total Deductions (i) Other Allocable (k) Total Allocable from applicable 15. Net Operating Before Adjustments (add columns 13(k) (i) Currency Loss Code Deductions Deductions line of Schedule H, Loss Deduction (subtract column 16 (h) Currency Loss through 15) (see instructions) (attach schedule) (add columns 13(a) Part I, column (b); from column 12) (see instructions) through 13(h) and 13(j)) Part II, column (f); and Part III, column (q))

<sup>\*</sup> For section 863(b) income, NOLs, income from RICs, high-taxed income, section 951A, and reattribution of income by reason of disregarded payments, use a single line (see instructions). Also, for reporting branches that are QBUs, use a separate line for each such branch.

	hedule B		edit (Report all foreig							
Part	I-Foreign Ta	axes Paid, Accru	ued, and Deemed Pa	aid (see instructions)						
	1. Credit Is CI	aimed for Taxes		2. Foreign Taxes Paid or Ad	ccrued (attach schedule showi	ing amounts in foreign	currency and c	onversion rate(s) us	ed)	
		ck one):		Tax Withheld at Source of	on:					
	Paid	Accrued		(b) Distributions of				OD-14 Portion		
	Date Paid	Date Accrued	(a) Dividends	Previously Taxed Earnings and Profits	(c) Branch Remittances	(d) Interest		e) Rents, Royalties, and License Fees		(f) Other
Α										
В										
С										
Tota	<b>ls</b> (add lines A tl									
		2. Foreign Taxes Pai	id or Accrued (attach schedule	showing amounts in foreign	currency and conversion rate	(s) used) (continued)				
		Other Foreig	gn Taxes Paid or Accrued on:			(j) Total Foreign Tax	os Paid or Aco	ruod		eemed Paid
	(g) S	Sales	(h) Services Income		(i) Other	(add columns 2			(see in	structions)
Α										
В										
С										
Totals										
Part			edit (Complete a sepa							
1a	-	•	ued (total from Part I, co	•,,			1a			
b			by the corporation duri							
			related income is taken	-		•	41.			
•	•	,					1b			
2			rom Part I, column 3)				3 (			
3			ed, or deemed paid (en				4	)		
4			x kickout				4			
5			of foreign taxes (from S e current tax year .				5			
6	<i>,</i> .	•	es 1a through 5)						6	
7	_	•	licable column of Sche						-	
•			" line of column 17 of th						7	
8a			urces (enter taxable inc	• •		1	8a		•	
b			ructions)	•	·		8b			
c	-	•							8c	
9			e resulting fraction as a						9	
10		=	hich credit is allowed (re	· ·	· -					
		_		• • •	,			•	10	
11	,								11	
12	, ,	•	60(c))						12	
13		•	d 12) (see instructions)						13	
14		,	ter the smaller of line 6						14	

orm 1118 (Rev. 12-2022)								Page
	n Tax Credit (Report a							,
1 Credit for taxes on sec 2 Credit for taxes on fore 3 Credit for taxes on pas 4 Credit for taxes on ger 5 Credit for taxes on sec 6 Credit for taxes on inco 7 Total (add lines 1 through the second of the second	etion 951A category income sive category income sive category income seral category income seral category income seral category income re-sourced by treating h 6)	me	pine all such creating and or see instruction or here and or section 951 d paid by the criminal include the	redits on this lime.  In the approp  (a)(1) Incluse corporation column 10 a	s line)	f the corporation's  Comestic Corporation 951(a column 3 of the line	tax return  tax return  ration Filing Return (Second Schedule B, Part I, that come in Schedule B, Part I, that come is second by the schedule B, Part II I I I I I I I I I I I I I I I I I	s paid to sanctioned countries  7 8 9 ction 960(a)) m foreign corporations under orresponds with the identifying his Schedule C (see instructions
	of Foreign Corporation	Corrodato		IN or Reference		the Foreign Corporatio	n	Reference ID (if applicable)
0 T V F	<b>0</b> O	4. Function	onal Currency			5	5. Subpart F Income Group	
2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code— see instructions)	(ente	n Corporation er code— estructions)	(a) Reg 1.960-1(d)( (enter d	2)(ii)(B)(2)	(b) Reg. sec. 1.904-4(c)(3)(i)-(iv (enter code)	)	(c) Unit
6. Total Net Income in Subpart F Income Group (in functional currency of foreign corporation)	7. Total Eligible Current Year in Subpart F Income Gro (in U.S. dollars)		S. Section 951(a)(1	<u> </u>		ppart F Income Group U.S. Dollars	9. Divide Column 8(a) by Column 6	10. Tax Deemed Paid (multiply column 7 by column 9)
						-		
	1	1			1			1

Total (add amounts in column 10) . . . .

FORTI 1116 (Rev. 12-2022)						Page
	d Paid With Respect to Section 9					
Use this sche section 960(d	dule to figure the tax deemed paid by t ).	he corporation with respect to	section 951A inclusions of ea	rnings fro	m foreign corporation	ons under
Part I—Foreign Corporation's	Tested Income and Foreign Taxe	es .				
1a. Name of Fo	reign Corporation	1b. EIN or Reference ID I of the Foreign Corpora (see instructions)	ation (Year/	Year End 'Month) tructions)	3. Country of Incorporation (enter country code—see instructions)	4. Functional Currency of Foreign Corporation (enter code)
	B 0 1	107		_		
	<del>- 1 1                                 </del>					
5. Pro Rata Share of CFC's Tested Income From Applicable Form 8992 Schedule (see instructions)	6. CFC's Tested Income From Applicable Form 8992 Schedule (see instructions)	7. Divide Column 5 by Column 6	8. CFC's Tested Foreign Incon From Schedule Q (Form 5 (see instructions)		9. Pro Rata Share of Tes Taxes Paid or Acc (multiply column 7	crued by ČFC
	Total (add amounts in column 5)					
			Total (add amounts in co	olumn 9)		
Part II—Foreign Income Tax D	Deemed Paid					
1. Global Intangible Low-Taxed Inco	<b>2. Inclusion Percent</b> Divide Part II, Column	1 by 3. Multi	ply Part I, Column 9 Total, by		<b>4.</b> Tax Deemed Paultiply Part II, column 3, by the result here and include	y 80% (0.80).

Global Intangible Low-Taxed Income (section 951A inclusion)	<b>2. Inclusion Percentage.</b> Divide Part II, Column 1, by Part I, Column 5 Total	<b>3.</b> Multiply Part I, Column 9 Total, by Part II, Column 2 Percentage	4. Tax Deemed Paid (Multiply Part II, column 3, by 80% (0.80). Enter the result here and include on the line of Schedule B, Part I, column 3, that corresponds with the line with "951A" in column 2 of Schedule A.)

### Schedule E Tax Deemed Paid With Respect to Previously Taxed Earnings and Profits (PTEP) by Domestic Corporation Filing the Return (Section 960(b))

### Part I—Tax Deemed Paid by Domestic Corporation

Use this part to report the tax deemed paid by the domestic corporation with respect to distributions of PTEP from first-tier foreign corporations under section 960(b). For each line in Schedule E, Part I, include the column 11 amount in column 3 of the line in Schedule B, Part I, that corresponds with the identifying number specified in column 1 of Schedule A and that also corresponds with the identifying number specified in column 1b of this Schedule E, Part I (see instructions).

1a. Name of Distributing Foreign Co	prporation	of the	or Reference ID Number Foreign Corporation see instructions)	(Ye	ax Year End ear/Month) instructions)	3. Country of Incorporation (enter country code—see instructions)	4. Function of the D	nal Currency istributing Corporation	5. PTEP Group (enter code)	6. Annual PTEP Account (enter year)
						1				
7. Total Amount of PTEP in the PTEP Group Within an Annual PTEP Account	Taxes With Res	t of the PTEP Group spect to PTEP Group nual PTEP Account	9. Distribution From the PTEP Gr Within an Annual PTEP Accour	oup it		ivide Column 9 y Column 7		Properly Not F	Foreign Income  Attributable to  Previously Deem  y column 8 by c	PTEP and ed Paid
	<u> </u>									
Total (add amounts in column 11)										

## Schedule E Tax Deemed Paid With Respect to Previously Taxed Earnings and Profits (PTEP) by Domestic Corporation Filing the Return (Section 960(b)) (continued)

#### Part II—Tax Deemed Paid by First- and Lower-Tier Foreign Corporations

Use this part to report the tax deemed paid by a foreign corporation with respect to distributions of PTEP from lower-tier foreign corporations under section 960(b) that relate to distributions reported in Part I (see instructions).

<b>1</b> a.	Name of Distributing F	oreign Corporation	mb	1b. EIN or Reference ID No (see	umber of the Foreign Corporatinstructions)	tion	2. Tax Year I (Year/Mont (see instruction	:h)	3. Country of Incorporation (enter country code—see instructions)
	_					_			
	_			<del>/                                     </del>					
42	a. Name of Recipient Fo	oreign Corporation			umber of the Foreign Corporat instructions)	ion	5. Tax Year I (Year/Mont (see instruction	th)	6. Country of Incorporation (enter country code—see instructions)
7. Functional Currency of the Distributing Foreign Corporation	8. PTEP Group (enter code)	9. Annual PTEP Account (enter year)	10. Total Amount of PTEP in the PTEP Group Within an Annual PTEP Account	11. Total Amount of the PTEP Group Taxes With Respect to PTEP Group Within an Annual PTEP Account	<b>12.</b> PTEP Distributed		Divide Column 12 Div Column 10	Proper to Pi Previous (multip	gn Income Taxes ly Attributable TEP and Not ly Deemed Paid oly column 11 column 13)

orm i	1118 (Rev. 12-2022)		Page I
Sc	chedule F Reserved		
Sc	chedule G Reductions of Taxes Paid, Accrued, or Deemed Paid		
Part	t I—Reduction Amounts		
Α	Reduction of taxes under section 901(e)—Attach separate schedule	A	
В	Reduction of foreign oil and gas taxes—Enter amount from Schedule I, Part II, line 4	В	
С	Reduction of taxes due to international boycott provisions—Enter appropriate portion from Schedule C (Form 5713) (see instructions).  Important: Enter only "specifically attributable taxes" here	С	
D	Reduction of taxes for section 6038(c) penalty—Attach separate schedule	D	
E	Taxes suspended under section 909	E	
F	Reduction for disallowed taxes under section 965(g)	F	
G	Reduction for disallowed taxes under section 245A	G	
Н	Other reductions in taxes (attach schedule—see instructions)	н	
Γotal	ll (add lines A through H). Enter here and on Schedule B, Part II, line 3		
art	t II – Other Information		
ı	Check this box if, during the tax year, the corporation paid or accrued any foreign tax that was disqualified for credit under section 901(m) .		
J	Check this box if, during the tax year, the corporation paid or accrued any foreign tax that was disqualified for credit under section 901(j), (k), or	r (l) .	

### Schedule H Apportionment of Certain Deductions (Complete only once for all categories of income.)

Part I—Research and Experimental Deductions
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			(a) Gross Receipts Method							
		Product Line #	1 (SIC Code:	)	Product Line #	2 (SIC Code:	)	R&E Deductions (enter the sum of all amounts entered in		
	Santar	(i) Gross Intangible Income	(ii) Gross Receipts	(iii) R&E Deductions	(iv) Gross Intangible Income	(v) Gross Receipts	(vi) R&E Deductions	all applicable "R&E Deductions" columns).		
_1	Total (see instructions)									
2	Exclusive apportionment (50%) to either:									
а	U.S. source gross intangible income, or									
b	Foreign source gross intangible income									
3	Remaining R&E deductions to be apportioned (line 1 minus line 2a or line 2b)			_						
4	U.S. source gross intangible income/related gross receipts/allocated and apportioned R&E deductions									
а	Gross intangible income/Taxpayer's gross receipts									
b	Gross intangible income/Controlled parties' gross receipts									
С	Gross intangible income/Uncontrolled parties' gross									
	receipts									
d	Total line 4									
5	Total foreign source gross intangible income/related gross receipts/allocated and apportioned R&E deductions									
а	Gross intangible income/Taxpayer's gross receipts									
b	Gross intangible income/Controlled parties' gross receipts									
С	Gross intangible income/Uncontrolled parties' gross receipts									
d	Total line 5									

**Important:** See **Computer-Generated Schedule H** in the instructions.

#### Apportionment of Certain Deductions (Complete only once for all categories of income.) (continued) Schedule H Part I—Research and Experimental Deductions (continued) (a) Gross Receipts Method (b) Total R&E Deductions Product Line #1 (SIC Code: Product Line #2 (SIC Code: enter the sum of all amounts entered in all applicable "R&E (i) Gross Intangible (ii) Gross (iii) R&E (iv) Gross Intangible (v) Gross (vi) R&E Deductions" Income Receipts Deductions Income Receipts Deductions columns). Foreign source gross intangible income/related gross receipts/allocated and apportioned R&E deductions Enter code (1) Gross intangible income/Taxpayer's gross receipts (2) Gross intangible income/Controlled parties' gross receipts (3) Gross intangible income/Uncontrolled parties' gross receipts (5) Amount of line 3 R&E deductions apportioned to this separate category . . . . . . . . . . . . . . . . (6) Amount of line 2b R&E deductions apportioned to this separate category . . . . . . . . . . . . . . . . (7) Total R&E deductions for this separate category. Add lines 6a(5) and 6a(6) . . . . . . . . . . . . . . . Enter code (1) Gross intangible income/Taxpayer's gross receipts . (2) Gross intangible income/Controlled parties' gross receipts (3) Gross intangible income/Uncontrolled parties' gross receipts **(4)** Add lines 6b(1), 6b(2), and 6b(3) . . . . . . . . (5) Amount of line 3 R&E deductions apportioned to this separate category . . . . . . . . . . . . . . . . (6) Amount of line 2b R&E deductions apportioned to this separate category . . . . . . . . . . . . . . .

**Note:** Include the amount from column (b) of line 6a(7) in column 14 of the Schedule A that corresponds with the code entered on line 6a. If applicable, you should likewise include the amount from column (b) of line 6b(7) in column 14 of the Schedule A that corresponds with the code entered on line 6b. On page 10, you should likewise include the amount(s) from column (b) of lines 6c(7), 6d(7), and 6e(7) in column 14 of the Schedule A that corresponds with the code entered on lines 6c, 6d, and 6e, respectively.

**Important:** See **Computer-Generated Schedule H** in the instructions.

#### Schedule H Apportionment of Certain Deductions (Complete only once for all categories of income.) (continued)

Part	I—Research and Experimental Deductions (continue	ed)						
			(b) Total R&E Deductions					
		Product Line #	1 (SIC Code:	)	Product Line #	2 (SIC Code:	)	(enter the sum of all
	Santar	(i) Gross Intangible Income	(ii) Gross Receipts	(iii) R&E Deductions	(iv) Gross Intangible Income	(v) Gross Receipts	(vi) R&E Deductions	all applicable "R&E Deductions" columns).
С								
	(1) Gross intangible income/Taxpayer's gross receipts .							
	(2) Gross intangible income/Controlled parties' gross receipts							
	(3) Gross intangible income/Uncontrolled parties' gross receipts							
	<b>(4)</b> Add lines 6c(1), 6c(2), and 6c(3)							
	(5) Amount of line 3 R&E deductions apportioned to this separate category							
	(6) Amount of line 2b R&E deductions apportioned to this							
	separate category							
	(7) Total R&E deductions for this separate category. Add lines 6c(5) and 6c(6)							
d	Enter code							
	(1) Gross intangible income/Taxpayer's gross receipts .							
	(2) Gross intangible income/Controlled parties' gross receipts							
	(3) Gross intangible income/Uncontrolled parties' gross receipts							
	(4) Add lines 6d(1), 6d(2), and 6d(3)							
	(5) Amount of line 3 R&E deductions apportioned to this							
	separate category							
	(6) Amount of line 2b R&E deductions apportioned to this							
	separate category							
	(7) Total R&E deductions for this separate category. Add							
	lines 6d(5) and 6d(6)							
е								
	(1) Gross intangible income/Taxpayer's gross receipts .							
	(2) Gross intangible income/Controlled parties' gross receipts							
	(3) Gross intangible income/Uncontrolled parties' gross receipts							
	(4) Add lines 6e(1), 6e(2), and 6e(3)							
	(5) Amount of line 3 R&E deductions apportioned to this							
	separate category							
	(6) Amount of line 2b R&E deductions apportioned to this							
	separate category							
	(7) Total R&E deductions for this separate category. Add lines 6e(5) and 6e(6)							
7	Total foreign-source apportioned R&E deductions (add lines 6a(7), 6b(7), 6c(7), 6d(7), and 6e(7)). This should equal the amount entered on line 5d of this column							

	II – Deductions Allocated		ed Based on As		Tor all categorie	3 of income.) (co	ontinued)		
		(a) Average Va Check Me Tax book	lue of Assets – thod Used:		Deductions	(c) Stewardship Deductions	(d) Certain Industrial/Investor Damages	(e) Other Deductions (attach schedule)	(f) Totals (add the amounts from columns (b)(iii), (b)(iv), (c), (d), and (e))
	Sc	(i) Nonfinancial Corporations	(ii) Financial Corporations	(iii) Nonfinancial Corporations	(iv) Financial Corporations		(see instructions)	(see instructions)	Additional note: With respect to each
1a	Totals (see instructions) .	7 0 1 4							applicable statutory
b	Amounts specifically allocable under Temporary Regulations section 1.861-10T(e)								grouping, include the amount in column (f) of line 3a(2), 3b(2), 3c(2), 3d(2), or 3e(2)
С	Other specific allocations under Temporary Regulations section 1.861-10T								below in column 14 of the corresponding Schedule A.
d	Assets excluded from apportionment formula .								
2	Total to be apportioned (subtract the sum of lines 1b, 1c, and 1d from line 1a)								
3	Apportionment among statutory groupings and residual grouping (see instructions): Enter code								
а	(1) Section 245A dividend								
	(2) Other								
	(3) Total line a								
b	Enter code								
	(1) Section 245A dividend								
	(2) Other								
	(3) Total line b								
С	Enter code								
	(1) Section 245A dividend								
	(2) Other								
	(3) Total line c								
d	Enter code								
	(1) Section 245A dividend								
	(2) Other								
	(3) Total line d								
е	Enter code								
	(1) Section 245A dividend								
	(2) Other								
	(3) Total line e								
f	U.S. source								
-	(1) Section 245A dividend								
	(2) Other								
	(3) Total line f								
4	Expenses Allocated and App	oortioned to Secti	on 245A Dividend	s. Enter the sum	of amounts in col	umn (f) of lines 3	a(1), 3b(1), 3c(1) (	3d(1), 3e(1).	
-	and 3f(1) Include this line 4 r					( ) 3	( ) ( ) ( ) ,	4	

Schedule H Apportionment of Certain Deductions (Complete only once for all categories of income.) (continued)

Part III—Other Deductions

Part	III — Other Deductions								
	Sei		(a) Officers' Compensation Expense	(b) Amortization Deductions	(c) Depletion Deductions	(d) Product Liability Damages (see instructions)	(e) Other Deductions	(f) Total Deductions Allocated and Apportioned to Section 245A Dividend (add the amounts from columns (a) through (e))	(g) Totals (add the amounts from columns (a) through (e)).  Additional note: With respect to each applicable statutory grouping, include the amount in column (g) of line 2a(2), 2b(2), 2c(2), 2d(2), or 2e(2) below in column 14 of the corresponding Schedule A.
1	Total to be apportioned (see instru	ictions) .							
2	Apportionment among statutory grand residual grouping (see instruct								
а	Enter code								
	(1) Section 245A dividend								
	(2) Other								
	(3) Total line a								
b	Enter code								
	(1) Section 245A dividend								
	(2) Other								
	(3) Total line b								
С	Enter code								
	(1) Section 245A dividend								
	(2) Other								
	(3) Total line c								
d	Enter code								
	(1) Section 245A dividend								
	(2) Other								
	(3) Total line d								
е	Enter code								
	(1) Section 245A dividend								
	(2) Other								
	(3) Total line e								
f	U.S. source								
	(1) Section 245A dividend								
	(2) Other								
	(3) Total line f								
3	Expenses Allocated and Apportion								
	negative amount on Schedule B, F						3		
mnoi	tanti 500 Computor Conoratod S	anadula H	in the inetriletions						