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SCHEDULE I (Form 1120-F) (Rev. December 2026) Department of the Treasury Internal Revenue Service

Interest Expense Allocation Under Regulations Section 1.882-5

OMB No. 1545-0123

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

Name of corporation Employer identification number

- A Check here if the corporation is a foreign bank as defined in Regulations section 1.882-5(c)(4)
B This Schedule I is being completed with respect to (check one):
Adjusted U.S. booked liabilities method under Regulations section 1.882-5(d). Complete lines 1 through 15 and 21 through 25.
Separate currency pools method under Regulations section 1.882-5(e). Complete lines 1 through 9 and 16a through 25.

Step 1 Average U.S. Assets for the Tax Year: Regulations section 1.882-5(b)

Table with 5 columns: (a) Set(s) of books that give rise to U.S. booked liabilities, (b) Partnership interests, (c) Set(s) of books other than those described in columns (a) and (b), (d) Totals. Rows 1-5 describe asset categories and adjustments.

Step 2 U.S.-Connected Liabilities for the Tax Year: Regulations section 1.882-5(c)

Table with 6 columns: 6a-6d describe liability methods and ratios, 6e-7c describe U.S.-connected liabilities and reductions.

Step 3 Interest Expense Paid or Accrued on Average U.S. Booked Liabilities: Regulations section 1.882-5(d)

Table with 3 columns: (a) Set(s) of books that give rise to U.S. booked liabilities, (b) Partnership interests, (c) Totals. Rows 8-9 describe interest expense amounts.

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Step 3 (cont.) Adjusted U.S. Booked Liabilities Method: Regulations section 1.882-5(d)

If line 7c is greater than line 8, column (c), complete lines 10 through 13 below and skip lines 14a and 14b.

If line 7c is less than or equal to line 8, column (c), skip lines 10 through 13 and complete lines 14a and 14b.

10	If the corporation is a foreign bank that is making a current-year election to use a published rate as provided under Regulations section 1.882-5(d)(5)(ii)(B), check the box on this line, skip lines 10a through 10c, and enter the rate on line 10d <input type="checkbox"/>			
10a	Total interest paid or accrued during the tax year on U.S. dollar liabilities that are not U.S. booked liabilities included on line 8	10a		
10b	Average U.S. dollar denominated liabilities that are not U.S. booked liabilities included on line 8	10b		
10c	Divide line 10a by line 10b	10c		%
10d	Enter the published rate, if elected under Regulations section 1.882-5(d)(5)(ii)(B)	10d		%
10e	Enter the rate from line 10c or, if elected, the published rate on line 10d. See instructions if amount on line 10c is zero	10e		%
11	Excess U.S.-connected liabilities. Subtract line 8, column (c), from line 7c	11		
12	Excess interest. Multiply line 10e by line 11	12		
13	Add line 9, column (c), and line 12	13		
14a	Scaling ratio. Divide line 7c by line 8, column (c)	14a		%
14b	Multiply line 9, column (c) by line 14a. See instructions for hedging amounts	14b		
15	Interest expense allocable to ECI under the adjusted U.S. booked liabilities method. Enter the result from line 13 or line 14b here and on line 21	15		

Step 3 (cont.) Separate Currency Pools Method: Regulations section 1.882-5(e)

	(a) U.S. dollar denominated	(b) Home country currency. Specify:	(c) Other currency. Specify:	(d) Other currency. Specify:
16a	U.S. assets. Enter the corporation's U.S. assets, using the methodology in Regulations section 1.882-5(e)(1)(i). If more columns are needed, attach statement. See instructions			
16b	Check here if a less than 3% currency election was made <input type="checkbox"/>			
17a	Enter the percentage from line 6e	%	%	%
17b	U.S.-connected liabilities. Multiply line 16a by line 17a, or, if a liability reduction election is made, see instructions			
18a	Enter the total interest expense paid or accrued for the tax year with respect to the foreign corporation's worldwide liabilities denominated in that foreign currency (enter in functional currency)			
18b	Enter the corporation's average worldwide liabilities (whether interest bearing or not) denominated in that foreign currency (enter in functional currency)			
18c	Borrowing rate: Divide line 18a by line 18b	%	%	%
19	Interest expense allocation by separate currency pool. Multiply line 17b by line 18c			
20	Interest expense allocable to ECI under the separate currency pools method. Total the amounts on line 19, columns (a) through (d), and amounts from attached statement, if any, and enter the result here and on line 21			20

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SUMMARY—Interest Expense Allocation and Deduction under Regulations section 1.882-5

21	Amount from line 15 or line 20, as applicable	21		
22	Enter the corporation's interest expense directly allocable under Regulations section 1.882-5(a)(1)(ii). (Include total from Schedule P, line 7.)	22		
23	Interest expense allocable to ECI under Regulations section 1.882-5. Add lines 21 and 22			23
24a	Amount of line 23 that is permanently disallowed as a deduction under the Internal Revenue Code or under an income tax treaty (attach statement—see instructions)	24a	()	
24b	Amount of line 23 that is deferred as a deduction in the current tax year by a provision of the Internal Revenue Code other than section 163(j) but may be allowed as a deduction in a subsequent tax year (attach statement—see instructions)	24b	()	
24c	Amount of line 23 that is disallowed business interest expense under section 163(j) (attach Form 8990)	24c	()	
24d	Amount of line 23 that is required to be capitalized under certain provisions of the Internal Revenue Code (attach statement—see instructions)	24d	()	
24e	Amount of interest expense that was deferred in a previous year by a provision of the Internal Revenue Code other than section 163(j) and allowed as a deduction in the current tax year (attach statement—see instructions)	24e		
24f	Amount of business interest expense that was disallowed in a previous year under section 163(j) but allowed as a deduction in the current year	24f		
24g	Combine lines 24a through 24f			24g
25	Total interest expense deduction under Regulations section 1.882-5. Combine lines 23 and 24g and enter here and on Form 1120-F, Section II, line 18. The amount entered on line 25 may not exceed the total interest expense paid or accrued by the foreign corporation			25

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