APA Annual Report SUMMARY

Department of the Treasury--Internal Revenue Service Large Business and International Division Transfer Pricing Operations

Advance Pricing and Mutual Agreement Program

| APA No | |
|---------------|-------------|
| Team Leader _ | |
| Economist | |
| Intl Examiner | |

| *T) | [m] | | |
|---------------------|---|--|--|
| APA Information | Taxpayer Name: | | |
| | Taxpayer EIN: NAICS: | | |
| | APA Term: Taxable years ending to | | |
| | Original APA [] Renewal APA [] | | |
| | Annual Report due dates: | | |
| | , 201 for all APA Years through APA Year ending in 200; for each APA Year | | |
| | thereafter, on [month and day] immediately following the close of the APA Year | | |
| | Principal foreign country(ies) involved in covered transaction(s): | | |
| | Type of APA: [] unilateral [] bilateral with | | |
| | Tested party is [] US [] foreign [] both | | |
| | Approximate dollar volume of covered transactions (on an annual basis) involving tangible goods and services: | | |
| | [] N/A [] <\$50 million [] \$50-100 million [] \$100-250 million [] \$250-500 million [] >\$500 million | | |
| | APA tests on (check all that apply): | | |
| | [] annual basis [] multi-year basis [] term basis | | |
| | APA provides (check all that apply) a: | | |
| | [] range [] point [] floor only [] ceiling only [] other | | |
| | APA provides for adjustment (check all that apply) to: | | |
| | [] nearest edge [] median [] other point | | |
| | | | |
| APA Annual Report | APA date executed:, 201 | | |
| Information | This APA Annual Report Summary is for APA Year(s) ending in 200_ and was filed on, 201_ | | |
| (to be completed | Check here [] if Annual Report was filed after original due date but in accordance with extension. | | |
| by the Taxpayer) | Has this APA been amended or changed? [] yes [] no Effective Date: | | |
| | Has Taxpayer complied with all APA terms and conditions? [] yes [] no | | |
| | Were all the critical assumptions met? [] yes [] no | | |
| | Has a Primary Compensating Adjustment been made in any APA Year covered by this Annual Report? | | |
| | [] yes [] no If yes, which year(s): 200 | | |
| | Have any necessary Secondary Compensating Adjustments been made? [] yes [] no | | |
| | Did Taxpayer elect APA Revenue Procedure treatment? [] yes [] no | | |
| | Any change to the entity classification of a party to the APA? [] yes [] no | | |
| | Taxpayer notice information contained in the APA remains unchanged? [] yes [] no | | |
| | Taxpayer's current US principal place of business: (City, State) | | |
| | | | |
| APA Annual Report | Financial analysis reflecting TPM calculations [] yes [] no | | |
| Checklist of | Financial statements showing compliance with TPM(s) [] yes [] no | | |
| Key Contents | Schedule M-1 or M-3 book-tax differences [] yes [] no | | |
| (to be completed | Current organizational chart of relevant portion of world-wide group [] yes [] no | | |
| by the Taxpayer) | Attach copy of APA [] yes [] no | | |
| o y : | Other APA records and documents included: | | |
| | | | |
| | | | |
| Contact Information | Authorized Representative Phone Number Affiliation and Address | | |
| Contact Information | Authorized Representative Thome Number Attituding and Address | | |
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