

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



Caution: DRAFT—NOT FOR FILING

This is an early release draft of an IRS tax form, instructions, or publication, which the IRS is providing for your information. **Do not file draft forms** and do **not** rely on draft forms, instructions, and publications for filing. We do **not** release draft forms until we believe we have incorporated all changes (except when explicitly stated on this coversheet). However, unexpected issues occasionally arise, or legislation is passed—in this case, we will post a new draft of the form to alert users that changes were made to the previously posted draft. Thus, there are never any changes to the last posted draft of a form and the final revision of the form. Forms and instructions generally are subject to OMB approval before they can be officially released, so we post only drafts of them until they are approved. Drafts of instructions and publications usually have some changes before their final release.

Early release drafts are at [IRS.gov/DraftForms](https://www.irs.gov/DraftForms) and remain there after the final release is posted at [IRS.gov/LatestForms](https://www.irs.gov/LatestForms). All information about all forms, instructions, and pubs is at [IRS.gov/Forms](https://www.irs.gov/Forms).

Almost every form and publication has a page on IRS.gov with a friendly shortcut. For example, the Form 1040 page is at [IRS.gov/Form1040](https://www.irs.gov/Form1040); the Pub. 501 page is at [IRS.gov/Pub501](https://www.irs.gov/Pub501); the Form W-4 page is at [IRS.gov/W4](https://www.irs.gov/W4); and the Schedule A (Form 1040/SR) page is at [IRS.gov/ScheduleA](https://www.irs.gov/ScheduleA). If typing in a link above instead of clicking on it, be sure to type the link into the address bar of your browser, not a Search box.

If you wish, you can submit comments to the IRS about draft or final forms, instructions, or publications at [IRS.gov/FormsComments](https://www.irs.gov/FormsComments). We cannot respond to all comments due to the high volume we receive and may not be able to consider many suggestions until the subsequent revision of the product.

If you have comments on reducing paperwork and respondent (filer) burden, with respect to draft or final forms, please respond to the relevant information collection through the Federal Register process; for more info, click [here](#).

Foreign Tax Credit—Corporations

▶ Attach to the corporation's tax return.
 ▶ Go to www.irs.gov/Form1118 for instructions and the latest information.

OMB No. 1545-0123

Attachment
 Sequence No. **118**

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

Name of corporation

Employer identification number

Use a separate Form 1118 for each applicable category of income (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) ▶ _____
- 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.)

	1. EIN or Reference ID Number (see instructions)*	2. Foreign Country or U.S. Possession (enter two-letter code—use a separate line for each) (see instructions)	3. Inclusions Under Sections 951(a)(1) and 951A (see instructions)				4. Dividends (see instructions)		5. Interest
			(a) Exclude Gross-Up	(b) Gross-Up (section 78)	(a) Exclude Gross-Up	(b) Gross-Up (section 78)			
A									
B									
C									
Totals (add lines A through C)									
	6. Gross Rents, Royalties, and License Fees	7. Sales	8. Gross Income From Performance of Services	9. Section 986(c) Gain	10. Section 987 Gain	11. Section 988 Gain	12. Other (attach schedule)		
A									
B									
C									
Totals									
	13. Total (add columns 3(a) through 12)	14. Allocable Deductions				Rental, Royalty, and Licensing Expenses		(f) Expenses Allocable to Sales Income	
		(a) Dividends Received Deduction (see instructions)	(b) Deduction Allowed Under Section 250(a)(1)(A)—Foreign Derived Intangible Income	(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	(d) Depreciation, Depletion, and Amortization	(e) Other Allocable Expenses			
A									
B									
C									
Totals									
	14. Allocable Deductions (continued)			15. Apportioned Share of Deductions (enter amount from applicable line of Schedule H, Part II, column (d))	16. Net Operating Loss Deduction	17. Total Deductions (add columns 14(i) through 16)	18. Total Income or (Loss) Before Adjustments (subtract column 17 from column 13)		
	(g) Expenses Allocable to Gross Income From Performance of Services	(h) Other Allocable Deductions (attach schedule) (see instructions)	(i) Total Allocable Deductions (add columns 14(a) through 14(h))						
A									
B									
C									
Totals									

* For section 863(b) income, NOLs, income from RICs, high-taxed income, section 965, 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.

Schedule B Foreign Tax Credit (Report all foreign tax amounts in U.S. dollars.)

Part I—Foreign Taxes Paid, Accrued, and Deemed Paid (see instructions)

1. Credit Is Claimed for Taxes (check one): <input type="checkbox"/> Paid <input type="checkbox"/> Accrued		2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)					
		Tax Withheld at Source on:					
		(a) Dividends	(b) Distributions of Previously Taxed Earnings and Profits	(c) Branch Remittances	(d) Interest	(e) Rents, Royalties, and License Fees	(f) Other
	Date Paid	Date Accrued					
A							
B							
C							
Totals (add lines A through C)							

		2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)			3. Tax Deemed Paid (see instructions)	
		Other Foreign Taxes Paid or Accrued on:				
	(g) Sales	(h) Services Income	(i) Other	(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))		
A						
B						
C						
Totals						

Part II—Separate Foreign Tax Credit (Complete a separate Part II for each applicable category of income.)

1a	Total foreign taxes paid or accrued (total from Part I, column 2(j))		
b	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)		
2	Total taxes deemed paid (total from Part I, column 3)		
3	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G)	()	
4	Taxes reclassified under high-tax kickout		
5	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year		
6	Total foreign taxes (combine lines 1a through 5)		
7	Enter the amount from the applicable column of Schedule J, Part I, line 11 (see instructions). If Schedule J is not required to be completed, enter the result from the "Totals" line of column 18 of the applicable Schedule A		
8a	Total taxable income from all sources (enter taxable income from the corporation's tax return)		
b	Adjustments to line 8a (see instructions)		
c	Subtract line 8b from line 8a		
9	Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1		
10	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)		
11	Multiply line 9 by line 10		
12	Increase in limitation (section 960(c))		
13	Credit limitation (add lines 11 and 12) (see instructions)		
14	Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III		

Schedule B Foreign Tax Credit (continued) (Report all foreign tax amounts in U.S. dollars.)

Part III—Summary of Separate Credits (Enter amounts from Part II, line 14 for each applicable category of income. Do not include taxes paid to sanctioned countries.)

1	Credit for taxes on section 951A category income	
2	Credit for taxes on foreign branch category income	
3	Credit for taxes on passive category income	
4	Credit for taxes on general category income	
5	Credit for taxes on section 901(j) category income (combine all such credits on this line)	
6	Credit for taxes on income re-sourced by treaty (combine all such credits on this line)	
7	Total (add lines 1 through 6)	
8	Reduction in credit for international boycott operations (see instructions)	
9	Total foreign tax credit (subtract line 8 from line 7). Enter here and on the appropriate line of the corporation's tax return	

Schedule C Tax Deemed Paid With Respect to Section 951(a)(1) Inclusions by Domestic Corporation Filing Return (Section 960(a))

Use this schedule to report the tax deemed paid by the corporation with respect to section 951(a)(1) inclusions of earnings from foreign corporations under section 960(a). For each line in Schedule C, include the column 10 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 entered in column 1b of this Schedule C (see instructions).

1a. Name of Foreign Corporation	1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	1c. QBU Reference ID (if applicable)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code—see instructions)	4. Functional Currency of Foreign Corporation (enter code - see instructions)	5. Subpart F Income Group		
						(a) Reg. sec. 1.960-1(d)(2)(ii)(B)(2)(enter code)	(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 Current Year Taxes in Subpart F Income Group (in U.S. Dollars)	8. Section 951(a)(1) Inclusion Attributable to Subpart F Income Group		9. Divide column 8(a) by column 6	10. Tax Deemed Paid (multiply column 7 by column 9)			
		(a) Functional Currency	(b) U.S. Dollars					
Total (add amounts in column 10)								

Schedule D Tax Deemed Paid With Respect to Section 951A Income by Domestic Corporation Filing the Return (Section 960(d))

Use this schedule to figure the tax deemed paid by the corporation with respect to section 951A inclusions of earnings from foreign corporations under section 960(d).

Part I—Foreign Corporation’s Tested Income and Foreign Taxes

1a. Name of Foreign Corporation	1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code— see instructions)	4. Functional Currency of Foreign Corporation (enter code)	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 income taxes from Schedule Q (Form 5471) (see instructions)	9. Pro rata share of tested foreign income taxes paid or accrued by CFC (Multiply amount in column 7 by amount in column 8)
Total (add amounts in column 5)									
Total (add amounts in column 9)									

Part II—Foreign Income Tax Deemed Paid

1. Global Intangible Low-Taxed Income (Section 951A Inclusion)	2. Inclusion Percentage. Divide Part II, Column 1, by Part I, Column 5 Total	3. Multiply Part I, Column 9 Total, by Part II, Column 2 Percentage	4. Tax Deemed Paid (Multiply Part II, column 3, by 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 Corporation	1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code—see instructions)	4. Functional Currency of the Distributing Foreign Corporation	5. PTEP Group (enter code)	6. Annual PTEP account (enter year)	7. Total amount of PTEP in the PTEP Group	8. Total amount of the PTEP group taxes with respect to PTEP group	9. Distribution from the PTEP Group	10. Divide column 9 by column 7	11. Foreign income taxes properly attributable to PTEP and not previously deemed paid (multiply column 8 by column 10)
Total (add amounts in column 11)											

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).

1a. Name of Distributing Foreign Corporation	1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code—see instructions)	4a. Name of Recipient Foreign Corporation	4b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	5. Tax Year End (Year/Month) (see instructions)	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	11. Total Amount of the PTEP group taxes with respect to PTEP group	12. PTEP Distributed	13. Divide column 12 by column 10	14. Foreign income taxes properly attributable to PTEP and not previously deemed paid (multiply column 11 by column 13)

Schedule F-1 Tax Deemed Paid by Domestic Corporation Filing Return—Pre-2018 Tax Years of Foreign Corporations

Use this schedule to figure the tax deemed paid by the corporation with respect to dividends from a first-tier foreign corporation under section 902(a), and deemed inclusions of earnings from a first- or lower-tier foreign corporation under section 960(a). **Report all amounts in U.S. dollars unless otherwise specified.**

IMPORTANT: Applicable to dividends or inclusions from tax years of foreign corporations beginning on or before December 31, 2017. If taxpayer does not have such a dividend or inclusion, do not complete Schedule F-1 (see instructions).

Part I—Dividends and Deemed Inclusions From Post-1986 Undistributed Earnings

For each line in Schedule F-1, Part I, include the column 12 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 either column 1b or 1c of this Schedule F-1, Part I (see instructions).

1a. Name of Foreign Corporation (identify DISCs and former DISCs)	1b. EIN (if any) of the Foreign Corporation	1c. Reference ID Number (see instructions)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code—see instructions)	4. Post-1986 Undistributed Earnings (in functional currency) (attach schedule)	5. Opening Balance in Post-1986 Foreign Income Taxes	6. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated	
							(a) Taxes Paid	(b) Taxes Deemed Paid (see instructions)
7. Post-1986 Foreign Income Taxes (add columns 5, 6(a), and 6(b))	8. Dividends and Deemed Inclusions		9. Divide Column 8(a) by Column 4	10. Multiply Column 7 by Column 9	11. Section 960(c) Limitation	12. Tax Deemed Paid (subtract column 11 from column 10)		
	(a) Functional Currency	(b) U.S. Dollars						
Total (add amounts in column 12)							▶	

Schedule F-1 Tax Deemed Paid by Domestic Corporation Filing Return—Pre-2018 Tax Years of Foreign Corporations (continued)

IMPORTANT: Applicable to dividends or inclusions from tax years of foreign corporations beginning on or before December 31, 2017.
If taxpayer does not have such a dividend or inclusion, do not complete Schedule F-1 (see instructions).

Part II—Dividends Paid Out of Pre-1987 Accumulated Profits

For each line in Schedule F-1, Part II, include the column 8(b) 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 either column 1b or 1c of this Schedule F-1, Part I (see instructions).

1a. Name of Foreign Corporation (identify DISCs and former DISCs)	1b. EIN (if any) of the Foreign Corporation	1c. Reference ID Number (see instructions)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code— see instructions)	4. Accumulated Profits for Tax Year Indicated (in functional currency computed under section 902) (attach schedule)	6. Dividends Paid		7. Divide Column 6(a) by Column 4		8. Tax Deemed Paid (see instructions)	
						(a) Functional Currency	(b) U.S. Dollars	(a) Functional Currency	(b) U.S. Dollars	(a) Functional Currency	(b) U.S. Dollars

Total (add amounts in column 8b) ▶

Part III—Deemed Inclusions From Pre-1987 Earnings and Profits

For each line in Schedule F-1, Part III, include the column 8 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 either column 1b or 1c of this Schedule F-1, Part I (see instructions).

1a. Name of Foreign Corporation (identify DISCs and former DISCs)	1b. EIN (if any) of the Foreign Corporation	1c. Reference ID Number (see instructions)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code— see instructions)	4. E&P for Tax Year Indicated (in functional currency translated from U.S. dollars, computed under section 964) (attach schedule)	6. Deemed Inclusions		7. Divide Column 6(a) by Column 4	8. Tax Deemed Paid (multiply column 5 by column 7)
						(a) Functional Currency	(b) U.S. Dollars		

Total (add amounts in column 8) ▶

Schedule F-2 Tax Deemed Paid by First- and Second-Tier Foreign Corporations Under Section 902(b) – Pre-2018 Tax Years of Foreign Corporations

Use Part I to compute the tax deemed paid by a first-tier foreign corporation with respect to dividends from a second-tier foreign corporation. Use Part II to compute the tax deemed paid by a second-tier foreign corporation with respect to dividends from a third-tier foreign corporation. **Report all amounts in U.S. dollars unless otherwise specified.**

IMPORTANT: Applicable to dividends from tax years of foreign corporations beginning on or before December 31, 2017. If taxpayer does not have such a dividend, do not complete Schedule F-2 (see instructions).

Part I – Tax Deemed Paid by First-Tier Foreign Corporations

Section A – Dividends Paid Out of Post-1986 Undistributed Earnings (Include the column 10 results in Schedule F-1, Part I, column 6(b).)

Table with 6 columns: 1a. Name of Second-Tier Foreign Corporation and Its Related First-Tier Foreign Corporation; 1b. EIN (if any) of the Second-Tier Foreign Corporation; 1c. Reference ID Number (see instructions); 2. Tax Year End (Year/Month) (see instructions); 3. Country of Incorporation (enter country code—see instructions); 4. Accumulated Profits for Tax Year Indicated (in functional currency—see instructions); 5. Opening Balance Post-1986 Foreign Income Taxes.

November 18, 2020

Table with 6 main sections: 6. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated (a) Taxes Paid, (b) Taxes Deemed Paid (see instructions); 7. Post-1986 Foreign Income Taxes (add columns 5, 6(a), and 6(b)); 8. Dividends Paid (in functional currency) (a) of Second-Tier Corporation, (b) of First-Tier Corporation; 9. Divide Column 8(a) by Column 4; 10. Tax Deemed Paid (multiply column 7 by column 9).

Section B – Dividends Paid Out of Pre-1987 Accumulated Profits (Include the column 8(b) results in Schedule F-1, Part I, column 6(b).)

Table with 6 columns: 1a. Name of Second-Tier Foreign Corporation and Its Related First-Tier Foreign Corporation; 1b. EIN (if any) of the Second-Tier Foreign Corporation; 1c. Reference ID Number (see instructions); 2. Tax Year End (Year/Month) (see instructions); 3. Country of Incorporation (enter country code—see instructions); 4. Accumulated Profits for Tax Year Indicated (in functional currency—attach schedule).

Table with 5 main sections: 5. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated (in functional currency—see instructions); 6. Dividends Paid (in functional currency) (a) of Second-Tier Corporation, (b) of First-Tier Corporation; 7. Divide Column 6(a) by Column 4; 8. Tax Deemed Paid (see instructions) (a) Functional Currency of Second-Tier Corporation, (b) U.S. Dollars.

Schedule F-2 Tax Deemed Paid by First- and Second-Tier Foreign Corporations Under Section 902(b) – Pre-2018 Tax Years of Foreign Corporations *(continued)*

IMPORTANT: Applicable to dividends from tax years of foreign corporations beginning on or before December 31, 2017. If taxpayer does not have such a dividend, do not complete Schedule F-2 (see instructions).

Part II – Dividends Deemed Paid by Second-Tier Foreign Corporations

Section A – Dividends Paid Out of Post-1986 Undistributed Earnings (In general, include the column 10 results in Section A, column 6(b), of Part I. However, see instructions for Schedule F-1, Part I, column 6(b), for an exception.)

1a. Name of Third-Tier Foreign Corporation and Its Related Second-Tier Foreign Corporation		1b. EIN (if any) of the Third-Tier Foreign Corporation	1c. Reference ID Number (see instructions)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code— see instructions)	4. Post-1986 Undistributed Earnings (in functional currency— attach schedule)	5. Opening Balance in Post-1986 Foreign Income Taxes
6. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated		7. Post-1986 Foreign Income Taxes (add columns 5, 6(a), and 6(b))		8. Dividends Paid (in functional currency)		9. Divide Column 8(a) by Column 4	10. Tax Deemed Paid (multiply column 7 by column 9)
(a) Taxes Paid	(b) Taxes Deemed Paid (from Schedule F-3, Part I, column 10)	(a) of Third-Tier Corporation	(b) of Second-Tier Corporation				

Section B – Dividends Paid Out of Pre-1987 Accumulated Profits (In general, include the column 8(b) results in Section A, column 6(b), of Part I. However, see instructions for Schedule F-1, Part I, column 6(b) for an exception.)

1a. Name of Third-Tier Foreign Corporation and Its Related Second-Tier Foreign Corporation		1b. EIN (if any) of the Third-Tier Foreign Corporation		1c. Reference ID Number (see instructions)		2. Tax Year End (Year/Month) (see instructions)		3. Country of Incorporation (enter country code— see instructions)		4. Accumulated Profits for Tax Year Indicated (in functional currency— attach schedule)	
5. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated (in functional currency— see instructions)		6. Dividends Paid (in functional currency)		7. Divide Column 6(a) by Column 4		8. Tax Deemed Paid (see instructions)					
		(a) of Third-Tier Corporation	(b) of Second-Tier Corporation			(a) Functional Currency of Third-Tier Corporation	(b) U.S. Dollars				

Schedule F-3 Tax Deemed Paid by Certain Third-, Fourth-, and Fifth-Tier Foreign Corporations Under Section 902(b) – Pre-2018 Tax Years of Foreign Corporations

Use this schedule to report taxes deemed paid with respect to dividends from eligible post-1986 undistributed earnings of fourth-, fifth-, and sixth-tier controlled foreign corporations. **Report all amounts in U.S. dollars unless otherwise specified.**

IMPORTANT: Applicable to dividends from tax years of foreign corporations beginning on or before December 31, 2017. If taxpayer does not have such a dividend, do not complete Schedule F-3 (see instructions).

Part I – Tax Deemed Paid by Third-Tier Foreign Corporations (In general, include the column 10 results in Schedule F-2, Part II, Section A, column 6(b). However, see instructions for Schedule F-1, Part I, column 6(b), for an exception.)

1a. Name of Fourth-Tier Foreign Corporation and Its Related Third-Tier Foreign Corporation		1b. EIN (if any) of the Fourth-Tier Foreign Corporation	1c. Reference ID Number (see instructions)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code—see instructions)	4. Post-1986 Undistributed Earnings (in functional currency—attach schedule)	5. Opening Balance in Post-1986 Foreign Income Taxes
6. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated		7. Post-1986 Foreign Income Taxes (add columns 5, 6(a), and 6(b))		8. Dividends Paid (in functional currency)		9. Divide Column 8(a) by Column 4	10. Tax Deemed Paid (multiply column 7 by column 9)
(a) Taxes Paid	(b) Taxes Deemed Paid (from Part II, column 10)	(a) of Fourth-Tier CFC	(b) of Third-Tier CFC				

Schedule F-3 Tax Deemed Paid by Certain Third-, Fourth-, and Fifth-Tier Foreign Corporations Under Section 902(b) – Pre-2018 Tax Years of Foreign Corporations (continued)

IMPORTANT: Applicable to dividends from tax years of foreign corporations beginning on or before December 31, 2017. If taxpayer does not have such a dividend, do not complete Schedule F-3 (see instructions).

Part II – Tax Deemed Paid by Fourth-Tier Foreign Corporations (In general, include the column 10 results in column 6(b) of Part I. However, see instructions for Schedule F-1, Part I, column 6(b), for an exception.)

Table with 10 columns: 1a. Name of Fifth-Tier Foreign Corporation and Its Related Fourth-Tier Foreign Corporation; 1b. EIN (if any) of the Fifth-Tier Foreign Corporation; 1c. Reference ID Number (see instructions); 2. Tax Year End (Year/Month) (see instructions); 3. Country of Incorporation (enter country code—see instructions); 4. Post-1986 Undistributed Earnings (in functional currency—attach schedule); 5. Opening Balance in Post-1986 Foreign Income Taxes; 6. Foreign Taxes Paid and Deemed Paid for Tax Year Indicated (a) Taxes Paid, (b) Taxes Deemed Paid (from Part III, column 10); 7. Post-1986 Foreign Income Taxes (add columns 5, 6(a), and 6(b)); 8. Dividends Paid (in functional currency) (a) of Fifth-Tier CFC, (b) of Fourth-Tier CFC; 9. Divide Column 8(a) by Column 4; 10. Tax Deemed Paid (multiply column 7 by column 9).

Part III – Tax Deemed Paid by Fifth-Tier Foreign Corporations (In general, include the column 10 results in column 6(b) of Part II, above. However, see instructions for Schedule F-1, Part I, column 6(b), for an exception.)

Table with 10 columns: 1a. Name of Sixth-Tier Foreign Corporation and Its Related Fifth-Tier Foreign Corporation; 1b. EIN (if any) of the Sixth-Tier Foreign Corporation; 1c. Reference ID Number (see instructions); 2. Tax Year End (Year/Month) (see instructions); 3. Country of Incorporation (enter country code—see instructions); 4. Post-1986 Undistributed Earnings (in functional currency—attach schedule); 5. Opening Balance in Post-1986 Foreign Income Taxes; 6. Foreign Taxes Paid for Tax Year Indicated; 7. Post-1986 Foreign Income Taxes (add columns 5 and 6); 8. Dividends Paid (in functional currency) (a) of Sixth-Tier CFC, (b) of Fifth-Tier CFC; 9. Divide Column 8(a) by Column 4; 10. Tax Deemed Paid (multiply column 7 by column 9).

Schedule G Reductions of Taxes Paid, Accrued, or Deemed Paid

Part I—Reduction Amounts

A	Reduction of Taxes Under Section 901(e)—Attach separate schedule	
B	Reduction of Foreign Oil and Gas Taxes—Enter amount from Schedule I, Part II, line 4	
C	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	
D	Reduction of Taxes for Section 6038(c) Penalty—Attach separate schedule	
E	Taxes suspended under section 909	
F	Other Reductions of Taxes 1. Enter code—see instructions ▶ _____ 2. If more than one code is entered on line F1 or if code OTH is entered on line F1, attach schedule (see instructions).	

Total (add lines A through F). Enter here and on Schedule B, Part II, line 3 ▶

Part II—Other Information

G	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)	<input type="checkbox"/>
H	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 (l)	<input type="checkbox"/>

DRAFT AS OF
November 18, 2020
DO NOT FILE

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

Part I—Research and Experimental Deductions

	(a) Sales Method				(b) Gross Income Method—Check method used: <input type="checkbox"/> Option 1 <input type="checkbox"/> Option 2				(c) Total R&E Deductions (enter the sum of all amounts entered in all applicable “R&E Deductions” columns)
	Product Line #1 (SIC Code:)		Product Line #2 (SIC Code:)		Product Line #1 (SIC Code:)		Product Line #2 (SIC Code:)		
	(i) Gross Sales	(ii) R&E Deductions	(iii) Gross Sales	(iv) R&E Deductions	(v) Gross Income	(vi) R&E Deductions	(vii) Gross Income	(viii) R&E Deductions	
1 Totals (see instructions)									
2 Total to be apportioned									
3 Apportionment among statutory groupings (see instructions):									
a 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									
c 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									
e Enter Code									
(1) Section 245A dividend									
(2) Other									
(3) Total line e									
f Enter Code									
(1) Section 245A dividend									
(2) Other									
(3) Total line f									
4 Total foreign (add lines 3a(3), 3b(3), 3c(3), 3d(3), 3e(3), and 3f(3))									

Important: See Computer-Generated Schedule H in instructions.

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

Part II—Interest Deductions, All Other Deductions, and Total Deductions

	(a) Average Value of Assets— Check method used: <input type="checkbox"/> Tax book value <input type="checkbox"/> Alternative tax book value		(b) Interest Deductions		(c) All Other Deductions (attach schedule) (see instructions)	(d) Totals (add the corresponding amounts from column (c), Part I; columns (b)(iii) and (b)(iv), Part II; and column (c), Part II)
	(i) Nonfinancial Corporations	(ii) Financial Corporations	(iii) Nonfinancial Corporations	(iv) Financial Corporations		
1a Totals (see instructions)						
b Amounts specifically allocable under Temporary Regulations section 1.861-10T(e)						Additional note: Be sure to also enter the totals from lines 3a(2), 3b(2), 3c(2), 3d(2), 3e(2), and 3f(2) below in column 15 of the corresponding Schedule A.
c Other specific allocations under Temporary Regulations section 1.861-10T						
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 (see instructions):						
a 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						
c 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						
e Enter Code _____						
(1) Section 245A dividend						
(2) Other						
(3) Total line e						
f Enter Code _____						
(1) Section 245A dividend						
(2) Other						
(3) Total line f						
4 Total foreign (add lines 3a(3), 3b(3), 3c(3), 3d(3), 3e(3), and 3f(3)) ▶						

Section 904(b)(4) Adjustments

5 Expenses Allocated and Apportioned to Foreign Source Section 245A Dividend. Enter the sum of lines 3a(1), 3b(1), 3c(1), 3d(1), 3e(1), and 3f(1). Include the column (d) result as a negative amount on Schedule B, Part II, line 8b	
6 Enter expenses allocated and apportioned to U.S. source section 245A dividend. Include the column (d) result as a negative amount on Schedule B, Part II, line 8b	

Important: See Computer-Generated Schedule H in instructions.