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



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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; the Pub. 501 page is at IRS.gov/Pub501; the Form W-4 page is at IRS.gov/W4; and the Schedule A (Form 1040/SR) page is at 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.

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SCHEDULE H (Form 1120-F)

Department of the Treasury Internal Revenue Service Name of corporation

Deductions Allocated to Effectively Connected Income Under Regulations Section 1.861-8

► Attach to Form 1120-F.

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

2020

Employer identification number

OMB No. 1545-0123

Part I Home Office Deductible Expenses Definitely Related Solely to ECI or Non-ECI Note: Enter all amounts on lines 1a through 13 in only U.S. dollars or in only functional currency. If U.S. dollars, check box Otherwise, specify currency ▶ Total expenses on the books of the home office . . . Check the applicable box below to indicate the accounting convention used to compute the amount on line 1a: U.S. GAAP ☐ Home Country GAAP IFRS Other (specify) 2 Adjustments for U.S. tax principles (attach statement - see instructions) Total deductible expenses on the books of the home office. Combine lines 1a and 2 3 4 5 Bad debt expense included on line 3 5 Total of interest expense and bad debt expense. Add lines 4 and 5...... 6 6 7 Remaining deductible expenses to be allocated and apportioned between ECI and non-ECI. Subtract line 6 from line 3 7 Deductible expenses definitely related solely to non-ECI from subsidiaries 8 9 Deductible expenses definitely related solely to other non-ECI booked in the home country 9 10 Deductible expenses definitely related solely to other non-ECI booked in other 10 11 Total deductible expenses definitely related solely to ECI or non-ECI. Add lines 8 through 11 . 12 12 Home Office Deductible Expenses Allocated and Apportioned to ECI Part II Note: Enter the amounts on lines 15 through 20 in U.S. dollars. 13 Remaining deductible expenses on the books of the home office not definitely related solely to ECI or 13 14 Average exchange rate used to convert amounts to U.S. dollars (see instructions) 14 15 Enter the amount from line 13. If line 13 is stated in functional currency, divide line 13 by line 14 . . . 15 16 Remaining home office deductible expenses on line 15 allocated and apportioned under Regulations 16 Enter the amount from line 11. If line 11 is stated in functional currency, divide line 11 by line 14 . . . 17 17 18 Total home office deductible expenses allocated and apportioned to ECI. Add lines 16 and 17 18 Total deductible expenses from other non-U.S. locations allocated and apportioned to ECI . . . 19 19 20 Total deductible expenses allocated and apportioned to ECI. Add lines 18 and 19 and enter the amount here and on Form 1120-F, Section II, line 26 Part III Allocation and Apportionment Methods and Financial Records Used to Complete Parts I and II Note: Enter the amounts in Part III, lines 21a, 21b, 22a, and 22b in U.S. dollars. If any amount on line 20 is recorded as an interbranch amount on books and records used to prepare Form 1120-F. Gross income ratio: Gross ECI Worldwide gross income 21c **c** Divide line 21a by line 21b . . % 22 Asset ratio: Average U.S. assets from Schedule I, line 5, column (d) Worldwide assets (if applicable, from Schedule I, line 6b) . Divide line 22a by line 22b 22c % Number of personnel ratio: 23 Personnel of U.S. trade or business 23b % No 24 Did the corporation use any ratio-based methods (other than those indicated on lines 21 through 23 above) in 25 Did the corporation use any other methods (e.g., time-spent analysis or estimates) in Parts I and II? If "Yes," attach statement (see instructions).

Schedule H (Form 1120-F) 2020 Page **2**

Part III Allocation and Apportionment Methods and Financial Records Used to Complete Parts I and II (continued)

Note: Indicate whether the corporation used any of the following financial and other records in Parts I and II to identify deductible expenses allocated and apportioned to ECI.

	and the control of th							
26a							es N	lo.
b oz	Non-audited financial statements							
27 28	Other (e.g., home country regulatory reports or written, contemporal	ports neous	functional ana	 alvses) (attach s	 tatemer	.		
	Salar (sign, panel)			, (3,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1		,		
Part IV Allocation and Apportionment of Expenses on Books and Records Used to Prepare Form 1120-F, Schedule L Note: Enter all amounts in Part IV in U.S. dollars.								
29	Total expenses per books and records used to prepare For Schedule L	m 11	20-F, 29	20		0		
30	Adjustments for U.S. tax principles (attach statement – see instruction	ons)	30					
31	Total deductible expenses. Combine lines 29 and 30				31			
32a	Third-party interest expense included on line 31		32a					
b	Interbranch interest expense included on line 31		32b		_			
33	Bad debt expense included on line 31		33					
34	Other third-party deductible expenses not allocated or apportioned non-ECI under Regulations section 1.861-8 included on line statement)	31 (a						
35	Interbranch expenses per books and records included on line 3 included on line 32b (attach statement)				_			
36	Add lines 32a through 35				36			
37	Deductible expenses on books and records allocated and apportage Regulations section 1.861-8. Subtract line 36 from line 31				37			
	Reconciliation of allocation and apportionment of deductible expenses to ECI and non-ECI on books and records under Regulations section 1.861-8 (from line 37)		(a) ECI Amounts	(b) Non-ECI Am	ounts	(c) Total: Add columns (a) and (b)		
38a	Derivative transaction deductible expenses definitely related to ECI or non-ECI under Regulations section 1.861-8 (from line 37) .	38a						
b	Other deductible expenses definitely related to ECI or non-ECI (from line 37)	38b						
39	Total deductible expenses definitely related to ECI or non-ECI. Add lines 38a and 38b	39						
40	Other deductible expenses on books and records not definitely related to ECI or non-ECI that are allocated and apportioned to ECI and non-ECI (from line 37)	40						
41	Total deductible expenses on books and records allocated and apportioned to ECI and non-ECI. Add lines 39 and 40. Column (c) must equal line 37	41						
	Note: Line 41, column (a) is the total of the deductions reported on 24, and 27.	Form	1120-F, Sectio	on II, lines 12, 1	3, 14, 16	5, 17, 19	throu	ıgh