

**SCHEDULE P  
(Form 5471)**

(Rev. December 2019)

Department of the Treasury  
Internal Revenue Service

**Previously Taxed Earnings and Profits of U.S. Shareholder  
of Certain Foreign Corporations**

▶ Attach to Form 5471.

▶ Go to [www.irs.gov/Form5471](http://www.irs.gov/Form5471) for instructions and the latest information.

OMB No. 1545-0123

Name of U.S. shareholder	<b>Identifying number</b>
Name of foreign corporation	<b>Reference ID number</b> (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) . . . . . ▶ \_\_\_\_\_

<b>Part I Previously Taxed E&amp;P in Functional Currency</b> (see instructions)		<b>(a)</b> Section 965(a) Inclusion (section 959(c)(1)(A))	<b>(b)</b> Section 965(b)(4)(A) (section 959(c)(1)(A))	<b>(c)</b> Earnings Invested in U.S. Property (section 959(c)(1)(A))	<b>(d)</b> Section 951A Inclusion (section 959(c)(1)(A))	<b>(e)</b> Section 245A(e)(2) Inclusion (section 959(c)(1)(A))	<b>(f)</b> Section 959(e) (section 959(c)(1)(A))	<b>(g)</b> Section 964(e)(4) Inclusion (section 959(c)(1)(A))
<b>1a</b>	Balance at beginning of year (see instructions)							
<b>b</b>	Beginning balance adjustments (attach statement)							
<b>c</b>	Adjusted beginning balance (combine lines 1a and 1b)							
<b>2</b>	Reduction for taxes unsuspended under anti-splitter rules							
<b>3</b>	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation							
<b>4</b>	Previously taxed E&P carried over in nonrecognition transaction							
<b>5</b>	Other adjustments (attach statement)							
<b>6</b>	Total previously taxed E&P (combine lines 1c through 5)							
<b>7</b>	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P							
<b>8</b>	Actual distributions of previously taxed E&P							
<b>9</b>	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P							
<b>10</b>	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)							
<b>11</b>	Other adjustments (attach statement)							
<b>12</b>	Balance at beginning of next year (combine lines 6 through 11)							

**Part I** **Previously Taxed E&P in Functional Currency** (see instructions) *(continued)*

	<b>(h)</b> Section 951(a)(1)(A) Inclusion (section 959(c)(1)(A))	<b>(i)</b> Earnings Invested in Excess Passive Assets (section 959(c)(1)(B))	<b>(j)</b> Section 965(a) Inclusion (section 959(c)(2))	<b>(k)</b> Section 965(b)(4)(A) (section 959(c)(2))	<b>(l)</b> Section 951A Inclusion (section 959(c)(2))	<b>(m)</b> Section 245A(e)(2) Inclusion (section 959(c)(2))	<b>(n)</b> Section 959(e) (section 959(c)(2))	<b>(o)</b> Section 964(e)(4) Inclusion (section 959(c)(2))	<b>(p)</b> Section 951(a)(1)(A) Inclusion (section 959(c)(2))	<b>(q)</b> Total
<b>1a</b>										
<b>b</b>										
<b>c</b>										
<b>2</b>										
<b>3</b>										
<b>4</b>										
<b>5</b>										
<b>6</b>										
<b>7</b>										
<b>8</b>										
<b>9</b>										
<b>10</b>										
<b>11</b>										
<b>12</b>										

**Part II** Previously Taxed E&P in U.S. Dollars

		(a) Section 965(a) Inclusion (section 959(c)(1)(A))	(b) Section 965(b)(4)(A) (section 959(c)(1)(A))	(c) Earnings Invested in U.S. Property (section 959(c)(1)(A))	(d) Section 951A Inclusion (section 959(c)(1)(A))	(e) Section 245A(e)(2) Inclusion (section 959(c)(1)(A))	(f) Section 959(e) (section 959(c)(1)(A))	(g) Section 964(e)(4) Inclusion (section 959(c)(1)(A))
<b>1a</b>	Balance at beginning of year (see instructions)							
<b>b</b>	Beginning balance adjustments (attach statement)							
<b>c</b>	Adjusted beginning balance (combine lines 1a and 1b)							
<b>2</b>	Reduction for taxes unsuspended under anti-splitter rules							
<b>3</b>	Previously taxed E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation							
<b>4</b>	Previously taxed E&P carried over in nonrecognition transaction							
<b>5</b>	Other adjustments (attach statement)							
<b>6</b>	Total previously taxed E&P (combine lines 1c through 5)							
<b>7</b>	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P							
<b>8</b>	Actual distributions of previously taxed E&P							
<b>9</b>	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P							
<b>10</b>	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)							
<b>11</b>	Other adjustments (attach statement)							
<b>12</b>	Balance at beginning of next year (combine lines 6 through 11)							

**Part II** Previously Taxed E&P in U.S. Dollars *(continued)*

	<b>(h)</b> Section 951(a)(1)(A) Inclusion (section 959(c)(1)(A))	<b>(i)</b> Earnings Invested in Excess Passive Assets (section 959(c)(1)(B))	<b>(j)</b> Section 965(a) Inclusion (section 959(c)(2))	<b>(k)</b> Section 965(b)(4)(A) (section 959(c)(2))	<b>(l)</b> Section 951A Inclusion (section 959(c)(2))	<b>(m)</b> Section 245A(e)(2) Inclusion (section 959(c)(2))	<b>(n)</b> Section 959(e) (section 959(c)(2))	<b>(o)</b> Section 964(e)(4) Inclusion (section 959(c)(2))	<b>(p)</b> Section 951(a)(1)(A) Inclusion (section 959(c)(2))	<b>(q)</b> Total
<b>1a</b>										
<b>b</b>										
<b>c</b>										
<b>2</b>										
<b>3</b>										
<b>4</b>										
<b>5</b>										
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