00-0000003

FORM 1120 TEST SCENARIO 3

FORMS REQUIRED: 1120, Sch G (F1120), Sch M-3 (F1120), Sch N (F1120), 926, 1118(4), Sch J (F1118), Sch K (F1118) (2), 5471 (2), Sch E (5471)(3), Sch H (F5471)(2), Sch J (F5471)(3), Sch I-1 (F5471), Sch M (F5471), Sch O (F5471), 5472, 8832, 8858(2), 8992, 8993

ATTACHMENTS:

ItemizedOtherDeductionsSchedule ItemizedOtherCurrentAssetsSchedule ItemizedOtherInvestmentSchedule ItemizedOtherInvestmentsSchedule NonincludibleForeignEntitySchedule

OtherIncomeLossItemsWithDifferencesSchedule OtherExpenseDeductionItemsWithDifferencesSchedule

OtherReductionOfTaxesSchedule

Category3FilerStatement

ItemizedOtherDeductionsSchedule2 ItemizedOtherCurrentAssetsSchedule ItemizedOtherCurrentLiabilitesSchedule

ItemizedOtherLiabilitiesSchedule EarningsAndProfitsOtherAdjStmt

BINARY ATTACHMENTS: Organizational Chart for Form 5471 Sch O

HEADER INFO: Not on actual form

MultipleSoftwarePackagesUsed: No

Originator: EFIN: Self-select

Type: ERO
Practioner PIN:
EFIN: Self-select
PIN: Self-select
PIN Entered by: ERO

Signature Option: PIN Number

Officer: Name: Poppy Seed

Title: Chief Executive Officer Officer PIN: 000-00-1234 Taxpayer PIN: Self-select Phone: 888-555-1212 Email Address: poppyseed@IFI.com

Date signed: 02/15/2024

Preparer Name: Johnny Appleseed

Date Prepared: 02/15/2024

IRS PAYMENT: N/A
Prior Year Income Amt: \$417,113

October 05, 2023

Name Control: ANYW

Additional notes: Form 8832 has no information on page 3. Form 5471 (Sch J) has no information on page 3.

Form 1118 with Separate Category GEN has no information on page 6, 7, 8, 9, 10, 11, 13, and 14

Form 1118 with Separate Category 951A has no information on page 5-14

Form 1118 with Separate Category FB has no information on page 3-14

Form 1118 with Separate Category PAS has no information on page 3-14

Attachment 1, F1120, Line 26, Other Deductions (ItemizedOtherDeductionsSchedule)

Description	Amount
Audit Fees	68,160
Professional Expenses	31,227
Financial Service Costs	21,000
TOTAL*	120,387

^{*}The total amount is not part of the dependency schema; it is for illustrative purposes only.

Attachment 2, F1120, Schedule L, Line 6(b) & (d), Other Current Assets (ItemizedOtherCurrentAssetsSchedule)

Other Current Asset Description	Beginning Amount	Ending Amount
Pre-paid Expenses & Special Deposits	35,726	35,726

Attachment 3, F1120, Schedule L, Line 9 (b) & (d), Other Investments (ItemizedOtherInvestmentsSchedule)

Other Investment Description	Beginning Amount	Ending Amount
Investments in Subsidiaries	139.197.191	250.072.971

Attachment 4, F1120, Schedule M-3, Line 5 (a), Net Income From Nonincludible Foreign Entities (NonincludibleForeignEntitySchedule)

Name	EIN	Net income (loss) Amount	Total Assets	Total liabilities	Net amounts
Foreign Finance	APPLD FOR	41,193,236	76,436,862	6,395,936	0
Corporation					

Attachment 5, F1120, Sch M-3, Part II, Line 25, Other Income (Loss) Items with Differences (OtherIncomeLossItemsWithDifferencesSchedule)

Description	Income (Loss) per Income Statement Amount	Temporary Difference Amount	Permanent Difference Amount	Other Permanent Differences for Allocations to Non-ECI and ECI	Income (Loss) per Tax Return Amount
Recovery of Expense	512,526	-512,526	0	0	0

Attachment 6, F1120, Schedule M-3, Part III, Line 38, Other Expenses/Deduction Items with Differences (OtherExpenseDeductionItemsWithDifferencesSchedule)

Description	Expense per Income Statement Amount	Temporary Difference Amount	Permanent Difference Amount	Other Permanent Differences for Allocations to Non-ECI and ECI	Deductions per Tax Return Amount
Other Expense	(256,260)	256,260	0	0	0

Attachment 7, F1118, Sch G, Line F, Other Reduction of Taxes Schedule

OtherReductionOfTaxesSchedule

245A reduction	11,788,082
965(g) reduction	134,925
Total Other Reduction Amount	11,923,007

Attachment 8, F5471, Box B(3), Category of filer checkboxes (Category3FilerStatement)

Amount of Indebtedness	0
Type of Indebtedness	New acquisition
Name	Foreign Finance Corporation
US Address	75 Any Street, Austin, TX 78737
EIN/SSN/Missing EIN	APPLD FOR
Number of Shares	1000

Attachment 9, F5471, Sch C, Line 17, Other Deductions (ItemizedOtherDeductionsSchedule2)

Description	Foreign Amount	Amount
Miscellaneous Deductions	199,936	295,720
Operating Supplies	356,382	527,114
TOTAL*	556,318	822,834

^{*}The total amount is not part of the dependency schema; it is for illustrative purposes only.

Attachment 10, F5471, Schedule F, Line 5 (a) & (b), Other Current Assets (ItemizedOtherCurrentAssetsSchedule)

Other Current Asset Description	Beginning Amount	Ending Amount
Miscellaneous	255,108	243,012

Attachment 11, F5471, Schedule F, Line 8 (a) & (b), Other Investments (ItemizedOtherInvestmentSchedule)

Other Investment Description	Beginning Amount	Ending Amount
Investments in Stock (Non-affiliated)	57,437	36,820,277

Attachment 12, F5471, Schedule F, Line 16 (a) & (b), Other Current Liabilities (ItemizedOtherCurrentLiabilitiesSchedule)

Other Current Liability Description	Beginning Amount	Ending Amount
Other accrued liabilities	4,001,670	5,080,202

Attachment 13, F5471, Schedule F, Line 19 (a) & (b), Other Liabilities (ItemizedOtherLiabiliitesSchedule)

Other Liability Description	Beginning Amount	Ending Amount
Deferred Federal Income Taxes	2,016,428	1,247,422

Attachment 14, F5471, Schedule H, Line 2i, Other (EarningsAndProfitsOtherAdjStmt)

Recognize Exchange Gain on Note (Net Additions)	1,848,728
Reverse Stock Write-down (Net Additions)	86,410
Reverse Book Remediation Reserve (Net Additions)	11,146
TOTAL* (Net Additions)	1,946,284*
Reverse Book Exchange Gain (Net Subtractions)	515,184
TOTAL* (Net Subtractions)	515,184*

Tax Year 2023

October 05, 2023 1120 MeF ATS Scenario 3 *The total amount is not part of the dependency schema; it is for illustrative purposes only.

OMB No. 1545-0123

October 05, 2023

Tax Year 2023 1120 MeF ATS Scenario 3 U.S. Corporation Income Tax Return

For calendar year 2023 or tax year beginning January 01, 2023, ending December 31, 20, 23

Department of the Treasury Go to www.irs.gov/Form1120 for instructions and the latest information. Internal Revenue Service A Check if: Name B Employer identification number 1a Consolidated return Anywork Finance Incorporated 00-000003 (attach Form 851) **TYPE** C Date incorporated Number, street, and room or suite no. If a P.O. box, see instructions. b Life/nonlife consoli-OR dated return . 08-01-1985 **PRINT** Personal holding co. D Total assets (see instructions) City or town, state or province, country, and ZIP or foreign postal code (attach Sch PH) Personal service corp. Anytown, NY 10006 250,306,361 (see instructions) 4 Schedule M-3 attached ✓ E Check if: (1) Initial return ☐ Final return Name change (4) Address change Gross receipts or sales 1a 1,000,000 b 1b Returns and allowances . С Balance. Subtract line 1b from line 1a. 1c 1,000,000 2 2 Cost of goods sold (attach Form 1125-A). 3 Gross profit. Subtract line 2 from line 1c 3 1,000,000 4 4 Dividends and inclusions (Schedule C. line 23) 44,743,620 5 5 6 Gross rents 6 7 Gross royalties 7 8 Capital gain net income (attach Schedule D (Form 1120)) . 8 9 Net gain or (loss) from Form 4797. Part II. line 17 (attach Form 4797) 9 10 Other income (see instructions—attach statement) . . . 10 100,000 11 Total income. Add lines 3 through 10. 11 45,843,620 12 Compensation of officers (see instructions—attach Form 1125-E) 12 instructions for limitations on deductions.) 13 13 Salaries and wages (less employment credits) 200,000 14 Repairs and maintenance 14 15 Bad debts 15 16 16 17 Taxes and licenses 17 18 Interest (see instructions) 18 19 19 Charitable contributions . 20 Depreciation from Form 4562 not claimed on Form 1125-A or elsewhere on return (attach Form 4562). 20 21 21 22 Advertising 22 Pension, profit-sharing, etc., plans 23 23 24 Employee benefit programs 24 25 Energy efficient commercial buildings deduction (attach Form 7205) . 25 Deductions (See 26 Other deductions (attach statement) 26 120,387 27 27 320,387 28 28 Taxable income before net operating loss deduction and special deductions. Subtract line 27 from line 11. 45,523,233 29a Net operating loss deduction (see instructions) b Special deductions (Schedule C, line 24) . 29b 44,106,120 29c С 44,106,120 30 Taxable income. Subtract line 29c from line 28. See instructions 30 1,417,113 Refundable Credits, and 31 Total tax (Schedule J, Part I, line 11) 31 168,000 32 32 33 Total payments and credits (Schedule J, Part II, line 23) 33 16,678,103 34 Estimated tax penalty. See instructions. Check if Form 2220 is attached 34 35 35 Amount owed. If line 33 is smaller than the total of lines 31 and 34, enter amount owed . 36 Overpayment. If line 33 is larger than the total of lines 31 and 34, enter amount overpaid 36 16,510,103 Тах, 37 37 Enter amount from line 36 you want: Credited to 2024 estimated tax Refunded 16,510,103 Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge. Sign May the IRS discuss this return Here with the preparer shown below? Chief Executive Officer See instructions. ✓ Yes No Signature of officer Print/Type preparer's name Date Preparer's signature PTIN Check if **Paid** self-employed P00000002 **Preparer** 00-0000011 Firm's name Electronic Tax Filers, Inc. Firm's EIN **Use Only** 512-555-1212 Firm's address 100 Efile Drive, Anytown, NY 10006 Phone no.

Tax Year 2023 1120 MeF ATS Scenario 3

Form 1120 (2023)

Form 1	120 (2023)				Page 2
Sch	edule C	Dividends, Inclusions, and Special Deductions (see instructions)	(a) Dividends and inclusions	(b) %	(c) Special deductions (a) × (b)
1		from less-than-20%-owned domestic corporations (other than debt-financed		50	
2		from 20%-or-more-owned domestic corporations (other than debt-financed		65	
3	Dividends	on certain debt-financed stock of domestic and foreign corporations		See instructions	
4	Dividends	on certain preferred stock of less-than-20%-owned public utilities		23.3	
5	Dividends	on certain preferred stock of 20%-or-more-owned public utilities		26.7	
6	Dividends	from less-than-20%-owned foreign corporations and certain FSCs		50	
7	Dividends	from 20%-or-more-owned foreign corporations and certain FSCs		65	
8	Dividends	from wholly owned foreign subsidiaries		100	
9	Subtotal.	Add lines 1 through 8. See instructions for limitations		See instructions	
10	Dividends	from domestic corporations received by a small business investment operating under the Small Business Investment Act of 1958		100	
11	Dividends	from affiliated group members		100	
12	Dividends	from certain FSCs		100	
13	•	ource portion of dividends received from a specified 10%-owned foreign on (excluding hybrid dividends) (see instructions)		100	
14		from foreign corporations not included on line 3, 6, 7, 8, 11, 12, or 13 any hybrid dividends)			
15	Reserved	for future use			
16a	the stock	inclusions derived from the sale by a controlled foreign corporation (CFC) of of a lower-tier foreign corporation treated as a dividend (attach Form(s) 5471) actions)	43,668,620	100	43,668,620
b		inclusions derived from hybrid dividends of tiered corporations (attach Form(s) einstructions)			
С		usions from CFCs under subpart F not included on line 16a, 16b, or 17 (attach 471) (see instructions)	160,000		
17	Global Inta	angible Low-Taxed Income (GILTI) (attach Form(s) 5471 and Form 8992)	700,000		
18	Gross-up	for foreign taxes deemed paid	215,000		
19	IC-DISC a	and former DISC dividends not included on line 1, 2, or 3			
20	Other divid	dends			
21	Deduction	for dividends paid on certain preferred stock of public utilities			
22	Section 25	50 deduction (attach Form 8993)			437,500
23	Total divi	dends and inclusions. Add column (a), lines 9 through 20. Enter here and on the 4	44,743,620		.5.7500
24		cial deductions. Add column (c), lines 9 through 22. Enter here and on page 1, li			44,106,120

October 05, 2023 Form 1120 (2023) Page 3

Sch	redule J Tax Computation and Payment (see instructions)		•
Part I	-Tax Computation		
1	Income tax. See instructions	1	297,594
2	Base erosion minimum tax amount (attach Form 8991)	2	
3	Corporate alternative minimum tax from Form 4626, Part II, line 13 (attach Form 4626)	3	
4	Add lines 1, 2, and 3	4	297,594
5a	Foreign tax credit (attach Form 1118)		
b	Credit from Form 8834 (see instructions)		
С	General business credit (see instructions—attach Form 3800)		
d	Credit for prior year minimum tax (attach Form 8827)		
е	Bond credits from Form 8912		
6	Total credits. Add lines 5a through 5e	6	129,594
7	Subtract line 6 from line 4	7	168,000
8	Personal holding company tax (attach Schedule PH (Form 1120))	8	
9a	Recapture of investment credit (attach Form 4255)		
b	Recapture of low-income housing credit (attach Form 8611)		
С	Interest due under the look-back method—completed long-term contracts (attach		
	Form 8697)		
d	Interest due under the look-back method—income forecast method (attach Form 8866) 9d		
е	Alternative tax on qualifying shipping activities (attach Form 8902) 9e		
f	Interest/tax due under section 453A(c)		
g	Interest/tax due under section 453(I)		
Z	Other (see instructions—attach statement)		
10	Total. Add lines 9a through 9z	10	
11	Total tax. Add lines 7, 8, and 10. Enter here and on page 1, line 31	11	168,000
	I—Payments and Refundable Credits		
12	Reserved for future use	12	
13	Preceding year's overpayment credited to the current year	13	1,678,103
14	Current year's estimated tax payments	14	15,000,000
15	Current year's refund applied for on Form 4466	15 ()
16	Combine lines 13, 14, and 15	16	16,678,103
17	Tax deposited with Form 7004	17	
18	Withholding (see instructions)	18	
19	Total payments. Add lines 16, 17, and 18	19	16,678,103
20	Refundable credits from:		
а	Form 2439		
b	Form 4136		
С	Reserved for future use		
Z	Other (attach statement—see instructions)		
21	Total credits. Add lines 20a through 20z	21	
22	Elective payment election amount from Form 3800	22	
23	Total payments and credits. Add lines 19, 21, and 22. Enter here and on page 1, line 33	23	16,678,103

Form **1120** (2023)

October 05, 2023 Form 1120 (2023) Page 4

Sch	edule K Other Information (see instructions)				-			
1	Check accounting method: a ☐ Cash b ✓ Accrual	c Other (specify)			Yes	No		
2	See the instructions and enter the:							
а	Business activity code no.	522293						
b								
С								
3	Is the corporation a subsidiary in an affiliated group or a parent–subs		'		✓			
	If "Yes," enter name and EIN of the parent corporation ABC Finance	e (ABCF) 00-0000021						
4	At the end of the tax year:							
а	Did any foreign or domestic corporation, partnership (including							
	organization own directly 20% or more, or own, directly or indirectly, 50% or more of the total voting power of all classes of the							
	corporation's stock entitled to vote? If "Yes," complete Part I of Schedule G (Form 1120) (attach Schedule G)							
b	classes of the corporation's stock entitled to vote? If "Yes," complet					1		
_	At the end of the tax year, did the corporation:	e i ait ii oi ochedule a (i	omi 1120) (attach ochedule	, a) .		_ v		
5								
а	Own directly 20% or more, or own, directly or indirectly, 50% or more of any foreign or domestic corporation not included on Form 851 , Affiliations				√			
	If "Yes," complete (i) through (iv) below.	3 Octionals: 1 of fales of c	onstructive ownership, see ms	tractions	_			
		(ii) Employer	(iii) Country of		ercenta			
	(i) Name of Corporation	Identification Number (if any)	Incorporation		l in Voti tock	ing		
		, ,,						
Foreig	n Finance Corporation		UK			100%		
	·							
Foreig	n Sands		NL			100%		
b	Own directly an interest of 20% or more, or own, directly or indirectly, at							
	(including an entity treated as a partnership) or in the beneficial interest of	of a trust? For rules of cor	nstructive ownership, see instr	ructions				
	If "Yes," complete (i) through (iv) below.	(*) E	1					
	(i) Name of Entity	(ii) Employer Identification Number	(iii) Country of Organization	Percenta		ned in		
		(if any)	Organization	Profit, Los	ss, or C	Capital		
	D : 11:1							
6	During this tax year, did the corporation pay dividends (other than excess of the corporation's current and accumulated earnings and p		9	,		1		
	If "Yes," file Form 5452 , Corporate Report of Nondividend Distribution					v		
	If this is a consolidated return, answer here for the parent corporation							
7	•		•	vor of all				
7	At any time during this tax year, did one foreign person own, direct classes of the corporation's stock entitled to vote or at least 25% of		ũ.		1			
	For rules of attribution, see section 318. If "Yes," enter:		, , , , , , , , , , , , , , , , , , ,					
	(a) Percentage owned 100 and (b) Owner's country	UK						
	(c) The corporation may have to file Form 5472, Information Return							
	Corporation Engaged in a U.S. Trade or Business. Enter the number	<u> </u>	•	g.,				
8	Check this box if the corporation issued publicly offered debt instrun			. 🗆				
	If checked, the corporation may have to file Form 8281, Information R	_						
9	Enter the amount of tax-exempt interest received or accrued during							
10	Enter the number of shareholders at the end of the tax year (if 100 or	r fewer)						
11	If the corporation has an NOL for the tax year and is electing to forec							
	If the corporation is filing a consolidated return, the statement require or the election will not be valid.	-	·	,				
12	Enter the available NOL carryover from prior tax years (do not reduce it by a	ny deduction reported on r	page 1. line 29a) \$					

October 05, 2023 Form 1120 (2023) Page 5

Sch	edule K	Other Information (continued from page 4)		
13	Are the corpor tax year less th	ration's total receipts (page 1, line 1a, plus lines 4 through 10) for the tax year and its total assets at the end of the man \$250,000?	Yes	No ✓
	distributions a	corporation is not required to complete Schedules L, M-1, and M-2. Instead, enter the total amount of cash nd the book value of property distributions (other than cash) made during this tax year \$		
14		tion required to file Schedule UTP (Form 1120), Uncertain Tax Position Statement? See instructions		√
15a b		ration make any payments that would require it to file Form(s) 1099?		√
16	During this tax own stock?	year, did the corporation have an 80%-or-more change in ownership, including a change due to redemption of its		√
17	•	sequent to this tax year, but before the filing of this return, did the corporation dispose of more than 65% (by value) a taxable, non-taxable, or tax deferred transaction?		√
18		ration receive assets in a section 351 transfer in which any of the transferred assets had a fair market basis or fair of more than \$1 million?		√
19	under chapter	rporation's tax year, did the corporation make any payments that would require it to file Forms 1042 and 1042-S 3 (sections 1441 through 1464) or chapter 4 (sections 1471 through 1474) of the Code?		√ √
20		tion operating on a cooperative basis?		~
21	section 267A?	x year, did the corporation pay or accrue any interest or royalty for which the deduction is not allowed under See instructions		✓
22	Does this corp	the total amount of the disallowed deductions \$		√
	If "Yes," comp	elete and attach Form 8991.		V
23		ation have an election under section 163(j) for any real property trade or business or any farming business in effect year? See instructions		√
24	-	oration satisfy one or more of the following? If "Yes," complete and attach Form 8990. See instructions		√
а	The corporation	on owns a pass-through entity with current, or prior year carryover, excess business interest expense.		
b	current tax yea	on's aggregate average annual gross receipts (determined under section 448(c)) for the 3 tax years preceding the ar are more than \$29 million and the corporation has business interest expense.		
С	•	on is a tax shelter and the corporation has business interest expense.		/
25	•	tion attaching Form 8996 to certify as a Qualified Opportunity Fund?		V
26	indirectly by the 50% (for example)	per 22, 2017, did a foreign corporation directly or indirectly acquire substantially all of the properties held directly or the corporation, and was the ownership percentage (by vote or value) for purposes of section 7874 greater than help, the shareholders held more than 50% of the stock of the foreign corporation)? If "Yes," list the ownership wote and by value. See instructions		√
27	services); or (b)	uring this tax year, did the corporation (a) receive a digital asset (as a reward, award, or payment for property or) sell, exchange, or otherwise dispose of a digital asset (or a financial interest in a digital asset)? See instructions .		✓
28	If "Yes," attach	tion a member of a controlled group?		✓
29	•	ernative Minimum Tax:		/
а	If "Yes," go to	pration an applicable corporation under section 59(k)(1) in any prior tax year?		√
b		ation an applicable corporation under section 59(k)(1) in the current tax year because the corporation was an poration in the prior tax year?		√
	If "Yes," comp	lete and attach Form 4626. If "No," continue to question 29c.		
С	year? See insti			✓
20		ete and attach Form 4626. If "Yes," the corporation is not required to file Form 4626.		
30 a		tion required to file Form 7208 relating to the excise tax on repurchase of corporate stock (see instructions): s for stock repurchased by a covered corporation (or stock acquired by its specified affiliate)?		√
b		licable foreign corporation rules?		▼
c		ered surrogate foreign corporation rules?		√
		her (a), (b), or (c), complete Form 7208, Excise Tax on Repurchase of Corporate Stock. See the Instructions for		
31		olidated return with gross receipts or sales of \$1 billion or more and a subchapter K basis adjustment, as described ons, of \$10 million or more?		✓
	If "Yes," attac	ch a statement. See instructions.		

October 05, 2023 Page 6

Sch	edule L Balance Sheets per Books	Beginning	of tax	/ear	End of ta	x year
	Assets	(a)		(b)	(c)	(d)
1	Cash			250,328		192,664
2a	Trade notes and accounts receivable					·
b	Less allowance for bad debts	()			()	
3	Inventories					
4	U.S. government obligations					
5	Tax-exempt securities (see instructions)					
6	Other current assets (attach statement)			35,726		35,726
7	Loans to shareholders			5,000		5,000
8	Mortgage and real estate loans					·
9	Other investments (attach statement)			139,197,191		250,072,971
10a	Buildings and other depreciable assets					
b	Less accumulated depreciation	(()	
11a	Depletable assets				,	
b	Less accumulated depletion	(()	
12	Land (net of any amortization)				,	
13a	Intangible assets (amortizable only)					
b	Less accumulated amortization	(()	
14	Other assets (attach statement)				,	
15	Total assets					
	Liabilities and Shareholders' Equity					
16	Accounts payable					
17	Mortgages, notes, bonds payable in less than 1 year					
18	Other current liabilities (attach statement)					
19	Loans from shareholders					
20	Mortgages, notes, bonds payable in 1 year or more					
21	Other liabilities (attach statement)					
22	Capital stock: a Preferred stock					
	b Common stock	5,000		5,000	5,000	5,000
23	Additional paid-in capital			139,231,622	.,	249,913,859
24	Retained earnings—Appropriated (attach statement)			, , , ,		. , , ,
25	Retained earnings—Unappropriated			251,623		387,502
26	Adjustments to shareholders' equity (attach statement)					·
27	Less cost of treasury stock		()		()
28	Total liabilities and shareholders' equity			139,488,245		250,306,361
Sche	edule M-1 Reconciliation of Income (L	oss) per Books V	Vith In	come per Re	eturn	
	Note: The corporation may be requi					
1	Net income (loss) per books		7	Income recorde	d on books this year	
2	Federal income tax per books				this return (itemize):	
3	Excess of capital losses over capital gains .				rest \$	
4	Income subject to tax not recorded on books					
•	this year (itemize):					
	· · · · · · · · · · · · · · · · · · ·		8		nis return not charged	
5	Expenses recorded on books this year not				ome this year (itemize):	
	deducted on this return (itemize):		а	Depreciation .	. \$	
а	Depreciation \$		b	Charitable contribu	utions \$	
b	Charitable contributions . \$					
С	Travel and entertainment . \$					
			9		8	
6	Add lines 1 through 5		10	Income (page 1, li	ne 28)—line 6 less line 9	
_	edule M-2 Analysis of Unappropriated	Retained Earnin				
1	Balance at beginning of year	251,623			Cash	
2	Net income (loss) per books	135,879			Stock	
3	Other increases (itemize):	100,017			Property	
-			6		(itemize):	
			7	Add lines 5 and	6	
4	Add lines 1, 2, and 3	387.502			f year (line 4 less line 7)	387.502

October 05, 2023 **SCHEDULE G**

Anywork Finance Incorporated

1120 MeF ATS Scenario 3 **Information on Certain Persons Owning the Corporation's Voting Stock**

Tax Year 2023

(Rev. December 2011)

(Form 1120)

Name

► Attach to Form 1120. ▶ See instructions on page 2.

Certain Entities Owning the Corporation's Voting Stock. (Form 1120, Schedule K, Question 4a). Complete

OMB No. 1545-0123

00-0000003

Department of the Treasury Internal Revenue Service

Employer identification number (EIN)

instructions). (i) Name of Entity	(ii) Employer Identification	(iii) Type of Enti	ity (iv) Country of 0	Organization (v) Percent	tage Owned in Voting Stock
3C Finance	Number (if any)			,	(-)	
Je i manec	00-000021	Corporation	UK			100%
Question 4b). Cor more, or owns, di	als and Estates Own mplete columns (i) thr rectly or indirectly, 50 rote (see instructions)	ough (iv) below)% or more of	ı for any individua	I or estate th	at owr	ns directly 20% or
(i) Name o	f Individual or Estate		(ii) Identifying Number (if any)	(iii) Country (Citizenship (s instructions	ee	(iv) Percentage Owned in Voting Stock

Cat. No. 52684S

Tax Year 2023

October 05, 2023 SCHEDULE M-3 N6 (Form 1120)

Net Income (Loss) Reconciliation for Corporations With Total Assets of \$10 Million or More

(Rev. December 2019)
Department of the Treasury
Internal Revenue Service

► Attach to Form 1120 or 1120-C.

▶ Go to www.irs.gov/Form1120 for instructions and the latest information.

OMB No. 1545-0123

	corporation (common parent, if consolidated return)				Employer ide	ntification	number
Anywo	rk Finance Incorporated					00-00000	03
Che	ck applicable box(es): (1) ✓ Non-consolidated i	return (2)	Consolida	ted return (Fo	orm 1120 o	nly)	
	(3) ☐ Mixed 1120/L/PC g	group (4)	□ Dormant s	ubsidiaries s	chedule att	ached	
Part	Financial Information and Net Income (Loss) Reconci	iation (see i	instructions)		
	Did the corporation file SEC Form 10-K for its inco Yes. Skip lines 1b and 1c and complete lines 2 No. Go to line 1b. See instructions if multiple of the corporation prepare a certified audited nor Yes. Skip line 1c and complete lines 2a throug	2a through 11 wit non-tax-basis incom n-tax-basis incom	n respect to the come statement he statement for	nat SEC Form nts are prepa or that period	n 10-K. red. d?	?	
	 ☐ Yes. Complete lines 2a through 11 with respect to that income statement. ☐ No. Skip lines 2a through 3c and enter the corporation's net income (loss) per its books and records on line 4a. a Enter the income statement period: Beginning MM/DD/YYYY Ending MM/DD/YYYY 						
С	Has the corporation's income statement been respreceding the period on line 2a? Yes. (If "Yes," attach an explanation and the ar No.	-		ome stateme	nt periods	immediat	tely
С	Stock		-	oting		J 	$\overline{}$
4a b	Worldwide consolidated net income (loss) from inc Indicate accounting standard used for line 4a (see (1) ☐ GAAP (2) ☐ IFRS (3) ☐ Statutory (4)	instructions):	ource identifie		ne 1 .	4a	41,193,236
5a b 6a	Net income from nonincludible foreign entities (attach Net loss from nonincludible foreign entities (attach Net income from nonincludible U.S. entities (attach	statement and en statement) .				5a (5b 6a (41,193,236)
b 7a b c	Net loss from nonincludible U.S. entities (attach standard loss) of other includible foreign disregular Net income (loss) of other includible U.S. disregard Net income (loss) of other includible entities (attach loss) of other includible entities (attach loss)	arded entities (at ded entities (attac	tach statemen h statement)	t)		6b 7a 7b 7c	
8	Adjustment to eliminations of transactions betwee statement)	en includible entit	ies and noning	cludible entit	ies (attach	8 9	
10a b	Intercompany dividend adjustments to reconcile to Other statutory accounting adjustments to reconcil Other adjustments to reconcile to amount on line 1	o line 11 (attach s le to line 11 (atta	tatement) . ch statement)			10a 10b 10c	
11	Net income (loss) per income statement of inclu Note: Part I, line 11, must equal Part II, line 30, co	udible corporation	ons. Combine	lines 4 throu	gh 10 .	11	135,879
12	Enter the total amount (not just the corporation's following lines.		ets and liabili		tities includ	ed or re	moved on the
a b c d	Included on Part I, line 4		26,743,223 76,436,862		6,395,936 6,395,936		

October 05, 2023 Schedule M-3 (Form 1120) (Rev. 12-2019) Page 2

Name	e of corporation (common parent, if consolidated return)				Employer i	dentification number	_
Any	work Finance Incorporated					00-000003	
Chec	k applicable box(es): (1) Consolidated group (2) Parent corp	(3) Consolidated	eliminations (4)	Subsidia	ary corp (5)	Mixed 1120/L/PC gro	oup
Chec	k if a sub-consolidated: (6) 1120 group (7) 1120 eliminations	•					
Name	e of subsidiary (if consolidated return)				Employer i	dentification number	
D.	The December of Net Income (I and Income			0		With Taxable	
Pa	Reconciliation of Net Income (Loss) per I Income per Return (see instructions)	income Stateme	ent of includible	Corp	orations	with Taxable	
	Income (Loss) Items	(a)	(b)		(c)	(d)	—
	(Attach statements for lines 1 through 12)	Income (Loss) per Income Statement	Temporary Difference		Permanent Difference	Income (Loss) per Tax Return	
1	Income (loss) from equity method foreign corporations	moomo otatomont	Billoronoo		Billororioo	por rax riotam	
2	Gross foreign dividends not previously taxed						
3	Subpart F, QEF, and similar income inclusions		43,668,620			43,668,6	 620
4	Gross-up for foreign taxes deemed paid		43,000,020			43,000,0	320
5	Gross foreign distributions previously taxed						
6	Income (loss) from equity method U.S. corporations						
7	U.S. dividends not eliminated in tax consolidation .						
8	Minority interest for includible corporations						
9	Income (loss) from U.S. partnerships						_
10	Income (loss) from foreign partnerships						
11	Income (loss) from other pass-through entities						
12	Items relating to reportable transactions						
13	Interest income (see instructions)						
14	Total accrual to cash adjustment						
15	Hedging transactions						
16	Mark-to-market income (loss)						
17	Cost of goods sold (see instructions)	()				()
18	Sale versus lease (for sellers and/or lessors)						
19	Section 481(a) adjustments						
20	Unearned/deferred revenue						
21	Income recognition from long-term contracts						
	Original issue discount and other imputed interest .						_
23	a Income statement gain/loss on sale, exchange,						
	abandonment, worthlessness, or other disposition of						
	assets other than inventory and pass-through entities						
k	Gross capital gains from Schedule D, excluding						
	amounts from pass-through entities						
(Gross capital losses from Schedule D, excluding						
	amounts from pass-through entities, abandonment losses, and worthless stock losses						
	·						
(Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities,						
	abandonment losses, and worthless stock losses .						
	Abandonment losses						
	Worthless stock losses (attach statement)						
	Other gain/loss on disposition of assets other than inventory						
24							
25	Other income (loss) items with differences (attach statement)	512,526	(512,526)			_
26	Total income (loss) items. Combine lines 1 through 25	512,526	43,156,094			43,668,6	 620
27	Total expense/deduction items (from Part III, line 39)	(256,260)	256,260			15755076	0
28	Other items with no differences	(120,387)				(120,3	
2 9a	Mixed groups, see instructions. All others, combine	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,					
	lines 26 through 28	135,879	43,412,354	4		45,548,2	<u>2</u> 33
k	PC insurance subgroup reconciliation totals						_
(Life insurance subgroup reconciliation totals						
30	Reconciliation totals. Combine lines 29a through 29c	135,879	43,412,354	4		43,548,2	233
	Note: Line 30, column (a), must equal Part I, line 11, a	and column (d) mu	st equal Form 1120), page	e 1, line 28		

Tax Year 2023 1120 MeF ATS Scenario 3

|--|

	e of corporation (common parent, if consolidated return)			Employor idon	tification number
	work Finance Incorporated	(2) Canaslidated	Laliminations (4) □ C		-0000003
	k applicable box(es): (1) Consolidated group (2) Parent corp	(3) Consolidated	l eliminations (4) S	ubsidiary corp (5)	Mixed 1120/L/PC group
	k if a sub-consolidated: (6) 1120 group (7) 1120 eliminations				
lame	e of subsidiary (if consolidated return)			Employer iden	tification number
Б.					
Рa	rt III Reconciliation of Net Income (Loss) per I			Corporations W	ith Taxable
	Income per Return-Expense/Deduction			(a)	(4)
	Expense/Deduction Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1	U.S. current income tax expense				
2	U.S. deferred income tax expense				
3	State and local current income tax expense				
4	State and local deferred income tax expense				
5	Foreign current income tax expense (other than				
	foreign withholding taxes)				
6	Foreign deferred income tax expense				
	Foreign withholding taxes				
	Interest expense (see instructions)				
	Stock option expense				
	Other equity-based compensation				
	Meals and entertainment				
12	Fines and penalties				
	Judgments, damages, awards, and similar costs .				
	Parachute payments				
	Compensation with section 162(m) limitation				
	Pension and profit-sharing				
	Other post-retirement benefits				
	Deferred compensation				
	Charitable contribution of cash and tangible property				
20	Charitable contribution of intangible property				
21	Charitable contribution limitation/carryforward				
22	Domestic production activities deduction (see				
	instructions)				
23	Current year acquisition or reorganization				
	investment banking fees				
24	Current year acquisition or reorganization legal and				
	accounting fees				
	Current year acquisition/reorganization other costs .				
	Amortization/impairment of goodwill				
27	Amortization of acquisition, reorganization, and				
	start-up costs				
	Other amortization or impairment write-offs				
	Reserved				
	Depletion				
	Depreciation				
	Bad debt expense				
	Corporate owned life insurance premiums				
	Purchase versus lease (for purchasers and/or lessees) .				
	Research and development costs				
	Section 118 exclusion (attach statement)				
37	Section 162(r)—FDIC premiums paid by certain				
00	large financial institutions (see instructions)				
38	Other expense/deduction items with differences				
	(attach statement)	256,260	(256,260)		0
39	Total expense/deduction items. Combine lines 1				
	through 38. Enter here and on Part II, line 27,				
	reporting positive amounts as negative and		(0= (- : - :		

October 05, 2023 SCHEDULE N

1120 MeF ATS Scenario 3

Tax Year 2023

Foreign Operations of U.S. Corporations

Department of the Treasury Internal Revenue Service

(Form 1120)

Attach to Form 1120, 1120-C, 1120-IC-DISC, 1120-L, 1120-PC, 1120-REIT, 1120-RIC, or 1120-S. Go to www.irs.gov/Form1120 for the latest information.

OMB No. 1545-0123

Anywork Finance Incorporated

Employer identification number (EIN) 00-0000003

Foreign Operations Information

		_	
		Yes	No
1a	During the tax year, did the corporation own (directly or indirectly) any foreign entity that was disregarded as an entity separate from its owner under Regulations sections 301.7701-2 and 301.7701-3 or did the corporation own		
	(directly or indirectly) any foreign branch (see instructions)?	✓	
	If "Yes," you are generally required to attach Form 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), for each FDE and for each FB (see instructions).		
b	Enter the number of Forms 8858 attached to the corporation's tax return		
2	Enter the number of Forms 8865, Return of U.S. Persons With Respect to Certain Foreign Partnerships, attached to the corporation's tax return		
3	Excluding any partnership for which a Form 8865 is attached to the tax return, did the corporation own at least a 10% interest, directly or indirectly, in any other foreign partnership (including an entity treated as a foreign partnership under Regulations section 301.7701-2 or 301.7701-3)?		√
4a	Reserved for future use		
b	Enter the number of Forms 5471, Information Return of U.S. Persons With Respect to Certain Foreign Corporations, attached to the corporation's tax return		
5	During the tax year, did the corporation receive a distribution from, or was it the grantor of, or transferor to, a foreign trust?		√
	If "Yes," the corporation may have to file Form 3520, Annual Return To Report Transactions With Foreign Trusts and Receipt of Certain Foreign Gifts.		
6a	At any time during the 2023 calendar year, did the corporation have an interest in or a signature or other authority over a financial account (such as a bank account, securities account, or other financial account) in a foreign country?	✓	
b	See the instructions for exceptions and filing requirements for FinCEN Form 114 , Report of Foreign Bank and Financial Accounts (FBAR). If "Yes," enter the name of the foreign country		
7a	Is the corporation claiming the extraterritorial income exclusion?		
b	Enter the number of Forms 8873 attached to the tax return		
С	Enter the total of the amounts from line 52 (extraterritorial income exclusion (net of disallowed deductions)) of all Forms 8873 attached to the tax return		
8	Was the corporation a specified domestic entity required to file Form 8938 for the tax year (see the Instructions for Form 8938)?		√

926

1120 MeF ATS Scenario 3 Return by a U.S. Transferor of Property to a Foreign Corporation

Tax Year 2023

(Rev. November 2018) Department of the Treasury Internal Revenue Service

▶ Go to www.irs.gov/Form926 for instructions and the latest information.
 ▶ Attach to your income tax return for the year of the transfer or distribution.

OMB No. 1545-0026

Attachment Sequence No. **128**

Part		T
Name o	f transferor	Identifying number (see instructions)
Anywo	ork Finance, Incorporated	00-000003
1 2	Is the transferee a specified 10%-owned foreign corporation of the transferor was a corporation, complete questions 2a thr	· · ·
а	If the transfer was a section 361(a) or (b) transfer, was the	ransferor controlled (under section 368(c)) by
	five or fewer domestic corporations?	
b	Did the transferor remain in existence after the transfer? .	
	If not, list the controlling shareholder(s) and their identifying n	umber(s).
	Controlling shareholder	Identifying number
С	If the transferor was a member of an affiliated group filling corporation?	ng a consolidated return, was it the parent
	If not, list the name and employer identification number (EIN)	of the parent corporation.
	,	
	Name of parent corporation	EIN of parent corporation
d	Have basis adjustments under section 367(a)(4) been made?	
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d.	actual transferor (but is not treated as such under section 367),
а	The state of the s	
	·	CINI of a cuta cushin
	Name of partnership	EIN of partnership
b	Did the partner pick up its pro rata share of gain on the transf	er of partnership assets?
С	Is the partner disposing of its entire interest in the partnership	o?
d	Is the partner disposing of an interest in a limited partners	nip that is regularly traded on an established
_	securities market?	
Part	II Transferee Foreign Corporation Information (se	e instructions)
4	Name of transferee (foreign corporation)	5a Identifying number, if any
oreia	n Finance Corporation	00-000045
6	Address (including country)	5b Reference ID number
	, , , , , , , , , , , , , , , , , , , ,	(see instructions)
75 Anv	Street, Birmingham, England 126375	
7	Country code of country of incorporation or organization (see	instructions)
	UK	
0		
8	Foreign law characterization (see instructions)	
	ration Is the transferee foreign corporation a controlled foreign corporation.	

Tax Year 2023 1120 MeF ATS Scenario 3

Form 926 (Rev. 11-2018) Page **2**

		ding Transfer of Property	(see instructions)		
Section A—Cas		4)		, n	
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	09-30-2023	3	100,333		
If "Yes," sk	•	r transferred?r of Part III and go to Part IV.			🗌 Yes 🗌 No
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities	08-25-2023		25,752	35,45	
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
 Totals					
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra 13 Did the tra	rporation? o to line 12b. ansferor a domes a branch that is a continue to line 12 ly after the transforeign corporation tinue to line 12 ransferred loss a nsferor transfer p	stic corporation that transferration for a foreign disregarded entity) to the first transferration was the domestic content. It is included in gross incomponents of the described in section questions 14a through 15.	red substantially all of the o a specified 10%-owner 12d, and go to line 13. rporation a U.S. shareh	e assets of a foreign brid foreign corporation? older with respect to	ranch Yes . No
Section C-Intar	ngible Property	Subject to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) (d) Useful Arm's length on date of tra	price (e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described					
in sec. 367(d)(4)					
Totals					

October 05, 2023 Form 926 (Rev. 11-2018) Page 3

b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?
Suppl	lemental Part III Information Required To Be Reported (see instructions)
Part l	Additional Information Regarding Transfer of Property (see instructions)
ı artı	Additional information negariting transfer of Property (see instructions)
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
17	
18	(a) Before100 % (b) After100 %
а	(a) Before100 % (b) After100 % Type of nonrecognition transaction (see instructions) ▶ 356
	(a) Before100 % (b) After100 %
b	(a) Before
b c	(a) Before
С	(a) Before
С	(a) Before100 % (b) After100 % Type of nonrecognition transaction (see instructions) ▶ 356 Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(3)
c d	(a) Before
c d 19	(a) Before
c d 19	(a) Before
c d 19 20a b	(a) Before
c d 19 20a	(a) Before
c d 19 20a b	(a) Before

Form **926** (Rev. 11-2018)

(Rev. December 2022)

Tax Year 2023 1120 MeF ATS Scenario 3

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

	artment of the Treasury nal Revenue Service	For calendar year 20	23 , or oth	ner tax year	beginning _		, 20	,	and ending	, 2	0	Sequence No. 118
	ne of corporation											identification number
	ywork Finance Incorpor											00-0000003
	e a separate Form 111			•		,						
а	Separate Category ((Enter code—see inst	ructions.) .									GEN
b	If code 901j is enter	ed on line a, enter the	e country co	de for the	sanctioned	d country (s	ee instructions	3) .				
	If one of the RBT co											
S	chedule A Inc	ome or (Loss) Bef	ore Adjust	ments (F	report all a	amounts II			•			
					Country or				e or (Loss) From So	ources Outside th	e United S	States
		or Reference ID Number see instructions)*		(enter two-	letter code-	3. Inc	lusions Under Sec (see inst		(a)(1) and 951A	4. Dividend	ds	5.1.1
	(*	(See Instructions)		use a separate line for each) (see instructions)		(a) Evalu	de Gross-Up		rese Un (section 70)	(see instructions)		5. Interest
Α		00-000045			JK	(a) Exclu	43,668,620	(b) G	ross-Up (section 78)			
B		00-0000045			VL		43,000,020					
C		00-0000040		'	VL.							
	lals (add lines A through	C)					43,668,620					
100	6. Gross Rents, Royalties, and License Fees 7. Sales		8	8. Gross Income From Performance of Services		9. Cur			Currency Gain Code see instructions)	11. Other		12. Total (add columns 3(a) through 9 and 11)
Α												43,668,620
В												
С												
otals												43,668,620
						13. Allocal	ole Deductions					
	(a) Dividends	(b) Deduction Allowe	d Under (c) [Deduction All	owed Under	R	ental, Royalty, and	Licensin	g Expenses	(0.E. All		(g) Expenses Allocable
	Received Deduction (see instructions)	Section 250(a)(1)(A)— Derived Intangible In		Section 250(a)(1)(B)—Global Intangible Low-Taxed Income			(d) Depreciation, Depletion, and Amortization		Other Allocable Expenses	(f) Expenses All to Sales Inco		to Gross Income From Performance of Services
Α	43,668,6	520										
В												
С												
otals	43,668,6	520										
		13. Allocable Dedu	uctions <i>(continu</i>	ied)			14. Apportioned of Deduction					
	(h) Currency Loss	(i) Currency Loss Code (see instructions)	(j) Other A Deduc (attach so (see instru	tions :hedule)	Dedu (add colu	Allocable ctions mns 13(a) (h) and 13(j))	(enter amou from applica line of Schedu Part I, column Part II, column Part III, colum	unt uble ule H, n (b); (f); and	15. Net Operating Loss Deduction	16. Total De (add colum) through	ns 13(k)	17. Total Income or (Loss) Before Adjustments (subtract column 16 from column 12)
Α				120,387		43,789,007				4:	3,789,007	-120,387
В												
0			1									

43,789,007

120,387

-120,387

43,789,007

Totals

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

October 05, 2023 Form 1118 (Rev. 12-2022) Page 2

	hedule B		redit (Report all foreig			. dollars.)						
Part	I—Foreign T	axes Paid, Accr	ued, and Deemed Pa	aid (see ii	nstructions)							
		laimed for Taxes				crued (attach schedule show	ring amounts in foreign	currency	and conversion	n rate(s) use	d)	
	(che Paid	ck one):		Tax With	held at Source of	n:						
	Date Paid	Accrued Date Accrued	(a) Dividends	Previo	stributions of ously Taxed as and Profits	(c) Branch Remittances	(d) Interest	t	(e) Rents, and Lice			(f) Other
_				Laming	95 4114 1 101115							
A												
В												
С	In /n alal liman A 4	dayay ala O										
ota	ls (add lines A t		-:	1			(-) ()					
-			aid or Accrued (attach schedule		nounts in foreign	currency and conversion rate	e(s) usea) (continuea)					
-		Other Fore	eign Taxes Paid or Accrued on:				(j) Total Foreign Ta	xes Paid o	or Accrued		Tax Deei (see instri	
	(g)	Sales	(h) Services Income			(i) Other	(add columns 2	2(a) throug	gh 2(i))		(,
Α												11,788,082
В												175,000
С												170,000
otals												11,963,082
art	II-Separate	Foreign Tax Cr	edit (Complete a sep	arate Pal	rt II for each	applicable category	of income.)					
1a	Total foreign	taxes paid or accr	ued (total from Part I, co	olumn 2(j))				1a				
b	Foreign taxe	s paid or accrued	by the corporation dur	ring prior t	ax years that	were suspended due	e to the rules of					
	section 909	and for which the	related income is taken	n into acco	ount by the c	orporation during the	current tax year					
	(see instructi	ons)						1b				
2			from Part I, column 3)					2	11,	,963,082		
3			ued, or deemed paid (en					3 (11,9	923,007)		
4			ax kickout					4				
5			of foreign taxes (from S									
	, ·	•	ne current tax year .					$\overline{}$				
6			es 1a through 5)								6	40,075
7			olicable column of Sche								_	
0-			s" line of column 17 of th								7	
8a			ources (enter taxable inc					-	1,	,417,113		
b	-	·	ructions)								8c	1,417,113
с 9											9	1,417,113
		-	which credit is allowed (re	-							9	
10			vnich credit is allowed (r								10	297,594
11											11	277,374
12			60(c))								12	
13			nd 12) (see instructions)							-	13	0
14			iter the smaller of line 6								14	0

Sc	hedule B Foreign	Tax Credit (Report a	all foreig	ın tax amour	nts in U.S. dol	lars.) (co	ntinued)					
Part	III-Summary of Separ	rate Credits (Enter am	ounts fr	om Part II, lir	ne 14, for each	applical	ole category of inco	ome. Do not include taxes pa	aid to sanctioned countries.,			
1	Credit for taxes on sect	tion 951A category inco	me .					1				
2	Credit for taxes on fore	ign branch category inc	ome .					2				
3	Credit for taxes on pass	sive category income						3				
4	Credit for taxes on gene	eral category income						4				
5	Credit for taxes on sect	tion 901(j) category inco	me (com	bine all such	credits on this	line)		5				
6	Credit for taxes on inco	ome re-sourced by treat	y (combii	ne all such cr	edits on this lin	ie)		6				
7	Total (add lines 1 through	gh 6)							. 7			
8				•	,							
9								ax return				
Sc	hedule C Tax Dec	emed Paid With Res	pect to	Section 95	1(a)(1) Inclusi	ions by I	Domestic Corpor	ation Filing Return (Section	on 960(a))			
	section 9 number s	960(a). For each line in S specified in column 1 of	chedule	C, include the	e column 10 an also correspond	nount in c	olumn 3 of the line i	inclusions of earnings from to Schedule B, Part I, that correct rentered in column 1b of this to the second s	esponds with the identifying Schedule C (see instructions)			
	1a. Name o	f Foreign Corporation		10.		see instruction		1c. Tested Unit Re	1c. Tested Unit Reference ID (if applicable)			
Forei	ign Finance Corp					00-000004	5					
		T	ı									
	2. Tax Year End	3. Country of Incorporation		tional Currency			5.	Subpart F Income Group				
	(Year/Month) (see instructions)	(enter country code— see instructions)	(en	ign Corporation iter code— instructions)	(a) Reg. 1.960-1(d)(2 (enter co	2)(ii)(B)(2) 1.904-4(c)(3)(i)-(iv)		(0	c) Unit			
	202312	UK		GBP								
	6. Total Net Income in Subpart F Income Group (in functional currency	7. Total Eligible Current Yea in Subpart F Income Gro					ppart F Income Group	9. Divide Column 8(a) by Column 6	10. Tax Deemed Paid (multiply column 7			
	of foreign corporation)	(in U.S. dollars)		(a) Function	al Currency	(b)	U.S. Dollars	.,	by column 9)			
	161,917,394	3,7	180,665		600,093,170 43,688		43,688,620	3.70616865	11,788,082			
Total	(add amounts in column	10)						+	11 788 082			

Tax Year 2023 1120 MeF ATS Scenario 3

Form 1118 (Rev. 12-2022)

•	
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 I	ncome and Foreign Ta	xes							
1a. Name of Fore	eign Corpor	ation		N or Reference ID Numb he Foreign Corporation (see instructions)	per	2. Tax Year (Year/Mor (see instruc	nth)	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 pplicable Form 8992 Schedule (see instructions)		Column 5 lumn 6	8. CFC's Tested Foreign Income Taxes From Schedule Q (Form 5471) (see instructions)			Pro Rata Share of Tested Foreign Incom Taxes Paid or Accrued by CFC (multiply column 7 by column 8)		
							+			
	Total (:	add amounts in column 5)								
	Total (add amounts in column of			Total (add a	mounts in colur	mn 9)			
Part II—Foreign Income Tax De	eemed l	Paid			(- /			
Part II—Foreign Income Tax Deen 1. Global Intangible Low-Taxed Income (section 951A inclusion)		2. Inclusion Perce Divide Part II, Colur Part I, Column 5	mn 1, by	3. Multiply Part I, Column 9 Tot Part II, Column 2 Percentag		ge Enter t		4. Tax Deemed Paid ultiply Part II, column 3, by 80% (0.80). the result here and include on the line of le B, Part I, column 3, that corresponds we with "951A" in column 2 of Schedule A		

Tax Year 2023 1120 MeF ATS Scenario 3

Form 1118 (Rev. 12-2022)

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).

and that also componed with the i	dontinying name	or opcomod in cold	inin ib or tillo collocatio E, i ai	. 1 (000	motraotiono).					
1a. Name of Distributing Foreign Co	orporation	1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)			. Tax Year End (Year/Month) ee instructions)	3. Country of Incorporation (enter country code—see instructions)	Functional Currency of the Distributing Foreign Corporation		5. PTEP Group (enter code)	6. Annual PTEP Account (enter year)
Foreign Sands			00-000046		202312	NL	EUR			
7. Total Amount of PTEP in the PTEP Group Within an Annual PTEP Account	Taxes With Res	nt of the PTEP Group spect to PTEP Group nual PTEP Account	Distribution From the PTEP Gr Within an Annual PTEP Account			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)		
			3,5	00,000						175,000
Total (add amounts in column 11)			•		•					

October 05, 2023

Form 1118 (Rev. 12-2022)

Schedule E

Tax Deemed Paid With Respect to Previously Taxed Earnings and Profits (PTEP) by Domestic Corporation Filing the Return (Section 960(b)) (continued)

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 F	Foreign Corporation			umber of the Foreign Corpora instructions)	tion	2. Tax Year (Year/Mon (see instructi	th)	3. Country of Incorporation (enter country code—see instructions)
Foreign Sands				00-	-000046		202312)	CA
4	a. Name of Recipient Fo	oreign Corporation		4b. EIN or Reference ID Number of the Foreign Corporation (see instructions) 5. Tax Year (Year/Mor (see instruct					6. Country of Incorporation (enter country code—see instructions)
)	NL
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 Within an Annual PTEP Account	11. Total Amount of the PTEP Group Taxes With Respect to PTEP Group Within an Annual PTEP Account	12. PTEP Distributed		Divide Column 12 by Column 10		
EUR			3,500,000						175,000

October 05, 2023 Form 1118 (Rev. 12-2022) Page 7

Sc	chedule F Reserved		
Sc	chedule G Reductions of Taxes Paid, Accrued, or Deemed Paid		
Part	I-Reduction Amounts		
Α	Reduction of taxes under section 901(e)—Attach separate schedule	Α	
В	Reduction of foreign oil and gas taxes—Enter amount from Schedule I, Part II, line 4	В	
С	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	С	
D	Reduction of taxes for section 6038(c) penalty—Attach separate schedule	D	
E	Taxes suspended under section 909	E	
F	Reduction for disallowed taxes under section 965(g)	F	
G	Reduction for disallowed taxes under section 245A	G	
<u>H</u>	Other reductions in taxes (attach schedule—see instructions)	Н	11,923,007
	I (add lines A through H). Enter here and on Schedule B, Part II, line 3		11,923,007
Part	II – Other Information		
_1	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)		
J	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)	

(Rev. December 2022)

Tax Year 2023 1120 MeF ATS Scenario 3

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

	artment of the Treasury nal Revenue Service	For calendar year 20	23 ,	or other tax year	year beginning, 20, and ending, 20							Sequence No. 118	
Nam	e of corporation										Employer i	identification number	
An	ywork Finance Incorpor	rated										00-000003	
Use	a separate Form 111		_	•		,							
а	Separate Category (Enter code—see insti	ructions	s.)								951A	
b	If code 901j is enter	ed on line a, enter the	countr	y code for the	sanctioned	d country (s	ee instructions	s) .					
С	If one of the RBT co	des is entered on line	a, ente	er the country o	code for the	e treaty cou	untry (see instr	uctions	s)				
S	chedule A Inc	ome or (Loss) Befo	ore Ad	ljustments <i>(F</i>	Report all a	amounts ii							
					Country or	Gross Income or (Loss) From Sources Ou					Outside the United States		
		or Reference ID Number see instructions)*		(enter two-	ossession letter code— arate line for	3. Inclusions Under Sections 951(a)((see instructions)			4. Dividends (see instructions)		5. Interest		
				each) (see	instructions)	(a) Exclu	de Gross-Up	(b) G	iross-Up (section 78)	(888 11181148111	51.5)		
Α		00-000046		1	NL 700		700,000	175,000					
В													
С													
Tot	als (add lines A through	C)					700,000	175,000					
	6. Gross Rents, Royalties and License Fees	7. Sales		8. Gross Inco Performance o		9. Cur	rency Gain		Currency Gain Code see instructions)	11. Other (attach sched		12. Total (add columns 3(a) through 9 and 11)	
Α												875,000	
В													
С													
Totals												875,000	
		•				13. Allocal	ble Deductions				'		
	(a) Dividends	(b) Deduction Allowed	d I Inder	(c) Deduction All	owed Linder	R	Rental, Royalty, and Licensing Expenses					(g) Expenses Allocable	
	Received Deduction Section 250(a)(1)(A)—Foreign Section 250(a)(1)(A)—Foreign		(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income		(d) Depreciation, Depletion, and Amortization		(e) Other Allocable Expenses		(f) Expenses Alle to Sales Inco		to Gross Income From Performance of Services		
Α				437,500									
В													
С													
Totals					437,500								
		13. Allocable Dedu	uctions (c	ontinued)			14. Apportioned of Deduction						
	(h) Currency Loss	(i) Currency Loss Code (see instructions)	(atta	ther Allocable Deductions ach schedule) e instructions)	Dedu (add colu	Allocable ctions mns 13(a) h) and 13(j))	of Deductio (enter amou from applica line of Schedu Part I, columr Part II, column (Part III, colum	unt able ule H, n (b); (f); and	15. Net Operating Loss Deduction	16. Total Dec (add column through	ns 13(k)	17. Total Income or (Loss) Before Adjustments (subtract column 16 from column 12)	
Α						437,500					437,500	437,500	
В													
С													
Totals						437,500					437,500	437,500	

Cat. No. 10900F

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

October 05, 2023 Form 1118 (Rev. 12-2022) Page 2

Part I - Foreign Taxes Paid, Accrued, and Deemed Paid (see instructions) 1. Credit is Claimed for Taxes (check one): Tax Withheld at Source on: Tax Withheld at Source	140,000
Check one): Accrued Accrued (a) Dividends (b) Distributions of Previously Taxed Earnings and Profits (c) Branch Remittances (d) Interest (e) Rents, Royalties, and License Fees (f) Other Previously Taxed Earnings and Profits (e) Branch Remittances (d) Interest (e) Rents, Royalties, and License Fees (f) Other Remittances (e) Branch Remittances (d) Interest (e) Rents, Royalties, and License Fees (f) Other Remittances (e) Branch Remitt	140,000
Paid Accrued (a) Dividends (b) Distributions of Previously Taxed Earnings and Profits (c) Branch Remittances (d) Interest (e) Rents, Royalties, and License Fees (f) Other	140,000
Date Paid Date Accrued (a) Dividends Previously Taxed Earnings and Profits (c) Branch Remittances (d) Interest (e) Rents, Royalties, and License Fees (f) Other Additional Continued) Contails (add lines A through C)	140,000
A B C C C C C C C C C C C C C C C C C C	140,000
C C C C C C C C C C	140,000
Cotals (add lines A through C)	140,000
Totals (add lines A through C) . 2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (continued) Other Foreign Taxes Paid or Accrued on: (g) Sales (h) Services Income (i) Other (j) Total Foreign Taxes Paid or Accrued (see instructions) A B C C Otale Deart 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. Tax Deemed Paid (see instructions) 1	140,000
2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (continued) Other Foreign Taxes Paid or Accrued on: (g) Sales (h) Services Income (i) Other (i) Other (i) Total Foreign Taxes Paid or Accrued (see instructions) A B C C Interpretable Complete a separate Part II for each applicable category of income.) 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) Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G, Part I) Taxes reclassified under high-tax kickout Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III,	140,000
Other Foreign Taxes Paid or Accrued on: (g) Sales (h) Services Income (i) Other (i) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(ii)) Part II — Separate Foreign Tax Credit (Complete a separate Part II for each applicable category of income.) Total foreign taxes paid or accrued (total from Part I, column 2(j)) 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) Total taxes deemed paid (total from Part I, column 3) Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G, Part I) Taxes reclassified under high-tax kickout Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III,	140,000
(g) Sales (h) Services Income (i) Other (income) (ii) Other (income) (iii) Other (iii) Other (iiii) Other (iiii) Other (iiii) Other (iiii) Other (iiiii) Other (iiiiiii) Other (iiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiii	140,000
(g) Sales (h) Services Income (i) Other (add columns 2(a) through 2(ii)) A B C C C C C C C C C C C C C C C C C C	140,000
B C C Cotable C C Cotable C C Complete a separate Part II for each applicable category of income.) 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))	140,000
B C C Cotable C C Cotable C C Complete a separate Part II for each applicable category of income.) 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))	140,000
C Cotals Cotals Cotals Complete a separate Part II for each applicable category of income.) 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))	
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))	
Total foreign taxes paid or accrued (total from Part I, column 2(j))	
Total foreign taxes paid or accrued (total from Part I, column 2(j))	
section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)	
section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)	
Total taxes deemed paid (total from Part I, column 3)	
Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G, Part I)	
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 tay year	
	140,000
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,	
	366,084
8a Total taxable income from all sources (enter taxable income from the corporation's tax return)	
b Adjustments to line 8a (see instructions)	
	417,113
3	330846
Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development	207 504
'	297,594 76,878
11 Multiply line 9 by line 10	76,878
13 Credit limitation (add lines 11 and 12) (see instructions)	76,878
14 Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III	10,010

	n Tax Credit (Report a									
Part III—Summary of Sepa	<u> </u>		Part II, line	e 14, for eac	h applicat	ole category of inco	ome. Do	not include taxes p	aid to sanct	ioned countries.)
	ction 951A category inco									
	eign branch category inc							2 17,5	572	
•	ssive category income							35,1	144	
	neral category income							4	0	
	ction 901(j) category inco	•			,			5		
	ome re-sourced by treat	• `			•			6		
•	ugh 6)								. 7	129,594
	international boycott op	`		,					. 8	
	lit (subtract line 8 from li									129,594
Use this section	emed Paid With Res schedule to report the t 960(a). For each line in S specified in column 1 of	ax deemed pa Schedule C, in	aid by the clude the and that al	corporation column 10 also correspor	with respect mount in counts and swith the	ct to section 951(a)(olumn 3 of the line i e identifying numbe	1) inclusi in Schedu r entered	ons of earnings from ule B, Part I, that corr	foreign corp	h the identifying
1a. Name o	of Foreign Corporation		1b. E		ID Number of (see instruction	the Foreign Corporation ns)	1c. Tested Unit Reference ID (if applicable)			
		4. Functional	Currency			5.	Subpart F I	ncome Group		
2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code— see instructions)	(enter co	of Foreign Corporation (enter code — see instructions)		(a) Reg. sec. 1.960-1(d)(2)(ii)(B)(2) (enter code)			((c) Unit	
6. Total Net Income in Subpart F Income Group	7. Total Eligible Current Yea		ction 951(a)(1	1) Inclusion Attrib	outable to Sub	part F Income Group	9. 0	Divide Column 8(a)		Deemed Paid
(in functional currency of foreign corporation)	in Subpart F Income Gro (in U.S. dollars)		a) Functional	l Currency	(b)	U.S. Dollars		by Column 6		ply column 7 column 9)
Fotal (add amounts in column	n 1Ω\									

Tax Year 2023 1120 MeF ATS Scenario 3

Form 1118 (Rev. 12-2022)

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 Ta	xes						
1a. Name of Ford	eign Corpor	ration		N or Reference ID Numb he Foreign Corporation (see instructions)	per	2. Tax Ye (Year/M (see instru	onth)	3. Country of Incorporation (enter country code—see instructions)	4. Functional Currency of Foreign Corporation (enter code)
Foreign Sands				00-0000046		2023	12	NL	EUR
5. Pro Rata Share of CFC's Tested Income From Applicable Form 8992 Schedule (see instructions)		6. CFC's Tested Income pplicable Form 8992 Schedule (see instructions)		Column 5 lumn 6	From Sche	l ed Foreign Income edule Q (Form 547 e instructions)		9. Pro Rata Share of Tes Taxes Paid or Acc (multiply column 7	crued by CFC
800,000		200,000		4			50,000		200,000
	Total (add amounts in column 5)							
	Total	add amounts in column 5)		mounts in colu	ımn 9)	200,0			
Part II – Foreign Income Tax D	eemed	Paid			1				
Global Intangible Low-Taxed Income (section 951A inclusion)		2. Inclusion Perce Divide Part II, Colur Part I, Column 5	3. Multiply Part I, Column 9 Total, by Part II, Column 2 Percentage			Enter t	4. Tax Deemed Paid (Multiply Part II, column 3, by 80% Enter the result here and include on Schedule B, Part I, column 3, that corre the line with "951A" in column 2 of Sc		
	700,00		.875			175,000			140,000
		l .		I .					

(Rev. December 2022)

Department of the Treasury

Tax Year 2023 1120 MeF ATS Scenario 3

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

Interr	· · · · · · · · · · · · · · · · · · ·			or other tax year	her tax year beginning, 20, and ending, 20 Sequer							
Name	e of corporation										Employer i	dentification number
Any	work Finance Incorpor	rated										00-000003
Use	a separate Form 111	8 for each applicable	catego	ry of income (s	see instruct	tions).						
а	Separate Category (Enter code—see inst	ructions	s.)								FB
b	If code 901j is entere	ed on line a, enter the	countr	y code for the	sanctioned	d country (s	ee instructions	s)				
С	If one of the RBT co	des is entered on line	a, ente	er the country of	code for the	e treaty cou	untry (see instr	uctions	s)			
		ome or (Loss) Bef										
				2. Foreigi	n Country or		Gross Income or (Loss) From Sources Outside the United States					
	1. EIN o	or Reference ID Number			ossession -letter code—	3. Inclusions Under Sections 951(a)(1) and 951A						
	(\$	see instructions)*		,	arate line for	(see instructions)			4. Dividends (see instructions)		5. Interest	
				each) (see	instructions)	(a) Exclu	de Gross-Up	(b) Gi	ross-Up (section 78)	(555 111511 4511	51.5)	
Α		00-000018			NL							
В												
С												
Tota	als (add lines A through	C)										
	6. Gross Rents, Royalties and License Fees	7. Sales		8. Gross Inco Performance o		9. Cur	rency Gain		Currency Gain Code see instructions)	11. Other (attach sched		12. Total (add columns 3(a) through 9 and 11)
Α		2	200,000		100,000							300,000
В												
С												
Totals		2	200,000		100,000							300,000
		-				13. Allocal	ble Deductions					
	(a) Dividende	(b) Deduction Allowe	d Under	(c) Deduction All	lowed Linder	Rental, Royalty, and Licensing Expenses					(g) Expenses Allocable	
	Received Deduction Section 250(a)(1)(A)—Foreign Section 250(a)(1)(A)—Foreign		Section 250(a)(1	Deduction Allowed Under ction 250(a)(1)(B)—Global angible Low-Taxed Income		(d) Depreciation, Depletion, and Amortization		Other Allocable Expenses	(f) Expenses Allocable to Sales Income		to Gross Income From Performance of Services	
Α											150,000	50,000
В												
С												
Totals											150,000	50,000
	1	13. Allocable Ded	uctions (co	ontinued)	1		14. Apportioned of Deduction					
	(h) Currency Loss	(i) Currency Loss Code (see instructions)	D (atta	ther Allocable Deductions ach schedule) Einstructions)	Dedu (add colu	Allocable ctions mns 13(a) h) and 13(j))	(enter amou from applica line of Schedu Part I, column Part II, column Part III, colum	unt able ule H, n (b); (f); and	15. Net Operating Loss Deduction	16. Total Dec (add column through	ns 13(k)	17. Total Income or (Loss) Before Adjustments (subtract column 16 from column 12)
Α											200,000	100,000
В												
С												
Totals											200,000	100,000

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

October 05, 2023 Form 1118 (Rev. 12-2022) Page 2

Sc	hedule B	Foreign Tax Cr	redit (Report all foreig	n tax am	ounts in U.S	. dollars.)						
art	I-Foreign Ta	axes Paid, Accr	ued, and Deemed Pa	aid (see i	instructions)	,						
	1. Credit Is Cl	aimed for Taxes		2. Foreign	Taxes Paid or Ac	crued (attach schedule show	ring amounts in foreigr	currency	and conversio	n rate(s) use	ed)	
		ck one):		Tax Wit	hheld at Source or	ղ:						
	Date Paid	Accrued Date Accrued	(a) Dividends	Previ	stributions of lously Taxed gs and Profits	(c) Branch Remittances	(d) Interes	:		, Royalties, ense Fees		(f) Other
_				Lamin	gs and i ronts						-	
<u> </u>											-	
В												
С		1.0)									+	
ota	Is (add lines A t		.:				(-)					
-			aid or Accrued (attach schedule	e snowing ar	mounts in foreign o	currency and conversion rate	e(s) usea) (continuea)					
-		Other Forei	ign Taxes Paid or Accrued on:				(j) Total Foreign Ta	xes Paid	or Accrued			eemed Paid structions)
	(g) S	Sales	(h) Services Income			(i) Other	(add columns	2(a) throu	gh 2(i))		(0000	
A		13,333		6,667					20,000			
В		10,000		0,007					20,000			
С												
otals												
Part	II-Separate	Foreign Tax Cr	edit (Complete a sepa	arate Pa	rt II for each	applicable category	of income.)					
1a			ued (total from Part I, co			· · · · · · · · · · · · · · · · · · ·		1a		20,000		
b	Foreign taxes	paid or accrued	by the corporation dur	ing prior	tax years that	were suspended due	e to the rules of					
			related income is taken									
	(see instruction	ons)						1b				
2			from Part I, column 3)					2				
3			ied, or deemed paid (en					3 ()		
4	Taxes reclass	sified under high-ta	ax kickout					4				
5			of foreign taxes (from S									
			e current tax year .					5				
6	_	•	es 1a through 5)							-	6	20,000
7			olicable column of Sche								7	83,676
8a			ources (enter taxable inc							,417,113		52,010
b			ructions)		•	,		8b				
С	•	•									8c	1,417,113
9	Divide line 7 k		e resulting fraction as a							-	9	0.059046809
10		-	hich credit is allowed (re							-		
											10	297,594
11											11	17,572
12		,	60(c))							-	12	0
13		•	nd 12) (see instructions)							-	13	17,572
14	Separate fore	ign tax credit (ent	ter the smaller of line 6 of	or line 13)	. Enter here ar	nd on the appropriate I	ine of Part III .				14	17,572

(Rev. December 2022)

Tax Year 2023 1120 MeF ATS Scenario 3

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

	artment of the Treasury nal Revenue Service	For calendar year 20 _	23_, or ot	ther tax year	beginning _		, 20	,	and ending	, 2	0	Sequence No. 118
Nam	e of corporation											identification number
Any	ywork Finance Incorpor	rated										00-0000003
Use	a separate Form 111	8 for each applicable	category o	f income (s	see instruct	tions).						
а	Separate Category	(Enter code—see insti	ructions.) .									PAS
b	If code 901j is enter	ed on line a, enter the	e country co	ode for the	sanctioned	d country (s	ee instructions	s)				
С		des is entered on line	a, enter th	e country o	code for the	e treaty cou	untry (see instr	uctions	8)			
S	Schedule A Inc	ome or (Loss) Befo	ore Adjus	tments (F	Report all a	amounts ii	n U.S. dollars	. See S	Specific Instruc	tions.)		
				2. Foreign	Country or		Gross	Incom	e or (Loss) From So	urces Outside th	e United S	States
	_	or Reference ID Number see instructions)*		(enter two-	ossession letter code— arate line for	3. Inc	lusions Under Sec (see inst		(a)(1) and 951A	4. Dividend		5. Interest
					instructions)	(a) Exclu	ide Gross-Up	(b) Gr	ross-Up (section 78)	(see instruction	ons)	
Α		00-000046		1	VL	160,000			40,000			
В												
С												
Tot	als (add lines A through	C)					160,000		40,000			
	als (add lines A through C)			8. Gross Income From Performance of Services		9. Currency Gain			Currency Gain Code see instructions)	11. Other (attach sched		12. Total (add columns 3(a) through 9 and 11)
Α												200,000
В												
С												
Γotals												200,000
						13. Allocal	ble Deductions					
	(a) Dividends	(b) Deduction Allowed	d I Inder (c)	Deduction Alle	owed Linder	R	ental, Royalty, and	Licensing	g Expenses			(g) Expenses Allocable
	Received Deduction (see instructions)	Section 250(a)(1)(A)— Derived Intangible Ir	Foreign Se	ction 250(a)(1) angible Low-Ta	(B)-Global		ation, Depletion, mortization	(e)	Other Allocable Expenses	(f) Expenses All to Sales Inco		to Gross Income From Performance of Services
Α												
В												
С												
Γotals												
		13. Allocable Dedu	uctions (contin	ued)			14. Apportioned of Deduction					
	(h) Currency Loss	(i) Currency Loss Code (see instructions)	(j) Other A Deduc (attach so (see instr	ctions chedule)	Dedu (add colu	Allocable ctions mns 13(a) (h) and 13(j))	(enter amou from applica line of Schedu Part I, columr Part II, column (Part III, colum	int ble ile H, n (b); ff); and	15. Net Operating Loss Deduction	16. Total Dec (add colum through	ns 13(k)	17. Total Income or (Loss) Before Adjustments (subtract column 16 from column 12)
Α												200,000
В												
С												

200,000

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

October 05, 2023 Form 1118 (Rev. 12-2022) Page 2

	chedule B		redit (Report all foreig			. dollars.)					
Part	I—Foreign T	axes Paid, Accri	ued, and Deemed Pa								
		aimed for Taxes				crued (attach schedule show	ving amounts in foreign	currenc	y and conversion rate	(s) used)	
	(cne	ck one): Accrued		Tax Wit	hheld at Source or	1: T			1		
	Date Paid	Date Accrued	(a) Dividends	Previ	stributions of iously Taxed gs and Profits	(c) Branch Remittances	(d) Interes	t	(e) Rents, Roya and License F		(f) Other
					90 4.14 1 101110						
A											
В									+		
	Is (add lines A t	hrough C)									
IUla	is (add lines A t		id or Accrued (attach schedule	showing ar	mounts in foreign (currency and conversion rate	e(s) used) (continued)				
-			ign Taxes Paid or Accrued on:	onowing a	mounto in foreign	sarronoy and conversion race				2 Tay	Deemed Paid
		0 4.13. 1 516.	g rates raid or risorded on				(j) Total Foreign Ta				instructions)
	(g) S	Sales	(h) Services Income	:		(i) Other	(add columns	2(a) throu	ugh 2(i))		
Α											40,000
В											·
С											
Γotals											
Part	:II-Separate	Foreign Tax Cre	edit (Complete a sepa	arate Pa	art II for each	applicable category	of income.)				
1a	Total foreign	taxes paid or accru	ued (total from Part I, co	olumn 2(j))				1a	40,	000	
b			by the corporation dur								
	section 909 a	and for which the	related income is taken	into acc	ount by the co	orporation during the	current tax year				
	•	,						1b			
2		• •	from Part I, column 3)					2			
3								<u> </u>)	
4								4			
5								_			
•	, .	•	•								40.000
6	_	·									40,000
7											167 252
8a								1 1			107,333
b								-	1,417,	113	
C		•	•							80	1 <u>4</u> 17 113
9										-	
10		-	-			· -					3.110071020
		•	,	•	• '	. ,,	•		•	1 1	297.594
11	,										35,144
12											
13										. 13	35,144
14										. 14	35,144

October 05, 2023 SCHEDULE K

Tax Year 2023 1120 MeF ATS Scenario 3

Foreign Tax Carryover Reconciliation Schedule

(Rev. December 2018)

(Form 1118)

For calendar year 20 _____, or other tax year beginning ______, 20 _____, and ending ______, 20 _____.

See separate instructions.

OMB No. 1545-0123

Department of the Treasury Internal Revenue Service

► Attach to Form 1118.

to to www.irs.gov/Form1118 for instructions and the latest information.

nter	nal Revenue Service		▶(Go to www.irs.gov/Form	11118 for instructions ar	id the latest information	1.		1	
Vam	e of corporation								Employe	er identification number
Any	work Finance Incorporated	d							00	0000003
Use	a separate Schedule K (Form 1118) fo	or each category of	income (see instruc	tions).					
а	Separate Category (ent	er code—see	e instructions)					•		FB
b	If code 901j is entered	on line a, ente	er the country code	for the sanctioned	country (see instruct	ions)		•		
С	If code RBT is entered	on line a, ent	er the country code	for the treaty count	ry (see instructions)			•		
	Foreign Tax Carryo Reconciliation	ver	(i) 10th Preceding Tax Year	(ii) 9th Preceding Tax Year	(iii) 8th Preceding Tax Year	(iv) 7th Preceding Tax Year	(v) 6th Preceding Tax Year	(vi) 5th Prece Tax Ye		(vii) Subtotal (add columns (i) through (vi))
1	Foreign tax carryover from year (enter amounts from appropriate columns of lin prior year Schedule K (see	the e 8 of the								
2	Adjustments to line 1 (enter-	er description								
а	Carryback adjustment (see instructions)									
b	Adjustments for section 9 redeterminations (see inst									
С										
d										
е										
f										
g										
3	Adjusted foreign tax carry prior tax year (combine lin									
4	Foreign tax carryover used tax year (enter as a negati									
5	Foreign tax carryover expi in current tax year (enter a number)									
6	Foreign tax carryover generative current tax year	erated in								
7	Actual or estimated amou be carried back to prior ta as a negative number)									
8	Foreign tax carryover to the tax year. Combine lines 3		-0-							

October 05, 2023 Schedule K (Form 1118) (Rev. 12-2018) Page 2

SCITE	dule K (Form 1118) (Rev. 12-2018)							Page Z
	Foreign Tax Carryover Reconciliation (continued)	(viii) Subtotal from page 1 (enter the amounts from column (vii) on page 1)	(ix) 4th Preceding Tax Year	(x) 3rd Preceding Tax Year	(xi) 2nd Preceding Tax Year	(xii) 1st Preceding Tax Year	(xiii) Current Tax Year	(xiv) Totals (add columns (viii) through (xiii))
1	Foreign tax carryover from the prior tax year (enter amounts from the appropriate columns of line 8 of the prior year Schedule K (see instructions))							
2	Adjustments to line 1 (enter description—see instructions):							
а	Carryback adjustment (see instructions)							
b	Adjustments for section 905(c) redeterminations (see instructions)							
С								
d								
е								
f								
g								
3	Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2). Include the column (xiv) total on the current year Form 1118, Schedule B, Part II, line 5.							
4	Foreign tax carryover used in current tax year (enter as a negative number)							
5	Foreign tax carryover expired unused in current tax year (enter as a negative number)							
6	Foreign tax carryover generated in current tax year						2,428	2,428
7	Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number)							· ·
8	Foreign tax carryover to the following tax year. Combine lines 3 through 7.						2,428	2,428

Schedule K (Form 1118) (Rev. 12-2018)

October 05, 2023 SCHEDULE K

Tax Year 2023 1120 MeF ATS Scenario 3

Foreign Tax Carryover Reconciliation Schedule

(Rev. December 2018)

(Form 1118)

For calendar year 20 _____, or other tax year beginning ______, 20 _____, and ending ______, 20 _____.

OMB No. 1545-0123

Department of the Treasury Internal Revenue Service

► See separate instructions.

▶ Attach to Form 1118. ▶ Go to www.irs.gov/Form1118 for instructions and the latest information. Name of corporation **Employer identification number Anywork Finance Incorporated** 00 0000003 Use a separate Schedule K (Form 1118) for each category of income (see instructions). (vi) Foreign Tax Carryover Subtotal 10th Preceding 9th Preceding 8th Preceding 7th Preceding 6th Preceding 5th Preceding (add columns (i) Reconciliation Tax Year Tax Year Tax Year Tax Year Tax Year Tax Year through (vi)) Foreign tax carryover from the prior tax vear (enter amounts from the appropriate columns of line 8 of the prior year Schedule K (see instructions)) Adjustments to line 1 (enter description -see instructions): a Carryback adjustment (see instructions) Adjustments for section 905(c) redeterminations (see instructions) С d е f g Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2) Foreign tax carryover used in current tax year (enter as a negative number) Foreign tax carryover expired unused in current tax year (enter as a negative number) Foreign tax carryover generated in current tax year Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number) Foreign tax carryover to the following tax year. Combine lines 3 through 7.

Tax Year 2023 1120 MeF ATS Scenario 3

Schedule K (Form 1118) (Rev. 12-2018)

(viii) (xiv) (xi) (xii) (xiii) (ix) (x) Foreign Tax Carryover Subtotal from page 1 Totals 4th Preceding 3rd Preceding 2nd Preceding 1st Preceding Current (add columns (viii) Reconciliation (continued) (enter the amounts from Tax Year Tax Year Tax Year Tax Year Tax Year through (xiii)) column (vii) on page 1) Foreign tax carryover from the prior tax year (enter amounts from the appropriate columns of line 8 of the prior year Schedule K (see instructions)) Adjustments to line 1 (enter description—see instructions): a Carryback adjustment (see instructions) **b** Adjustments for section 905(c) redeterminations (see instructions) С d е f g Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2). Include the column (xiv) total on the current year Form 1118, Schedule B, Part II, line 5. Foreign tax carryover used in current tax year (enter as a negative number) Foreign tax carryover expired unused in current tax year (enter as a negative number) Foreign tax carryover generated in current tax year 4,856 4,856 Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number) Foreign tax carryover to the following tax year. Combine lines 3 through 7. 4,856 4,856

Schedule K (Form 1118) (Rev. 12-2018)

Page 2

Tax Year 2023

Schedule J (Form 1118)

1120 MeF ATS Scenario 3 Adjustments to Separate Limitation Income (Loss) Categories for **Determining Numerators of Limitation Fractions, Year-End Recharacterization Balances,** and Overall Foreign and Domestic Loss Account Balances

(Rev. December 2020)

Department of the Treasury Internal Revenue Service

una 0101an 10101Bn ana 2011100110 2000 / 1000an 2011an 201								
For calendar year 20	, or other tax year beginning	, 20	, and ending	, 20				
► Attach to Form 1118.								

OMB No. 1545-0123

Name of corporation **Employer identification number** Anywork Finance Incorporated 00-000003

Anyw	Anywork Finance, Incorporated 00-0000003										
Par	Part I Adjustments to Separate Limitation Income or (Losses) in Determining Numerators of Limitation Fractions (see instructions)										
		(i) Section 951A income	(ii) Foreign branch income	(iii) Passive category income	(iv) General category income	(v) Other income* (identify ▶	(vi) U.S. income				
1	Income or (loss) before adjustments	437,500	100,000	200,000	-120,387						
2	Allocation of separate limitation losses:										
а	Section 951A income		(()	()	()				
b	Foreign branch income	()		(()	()				
С	Passive category income	()	()		()	()				
d	General category income	71,416)	(16,324)	(32,647)	120,387	()				
е	Other income* (identify ►										
)	()	()	(()						
_ 3	Subtotal - Combine lines 1 through 2e.	366,084	83,676	167,353							
_ 4	Allocation of overall foreign losses						()				
5	Allocation of domestic losses	()	()	(()	()				
6	Subtotal —Combine lines 3 through 5.	366,084	83,676	167,353							
7	Recapture of overall foreign losses	()	()	(()	()				
8	Subtotal - Combine lines 6 and 7.	366,084	83,676	167,353							
9	Recharacterization of separate limitation income:										
а	Section 951A income	()									
b	Foreign branch income		(
С	Passive category income			(
d	General category income				()						
е	Other income* (identify ►)					()				
10	Recapture of overall domestic losses				_		()				
11	Numerator of Limitation Fraction— Combine lines 8 through 10. Enter each result here and on Schedule B, Part II, line 7, of corresponding Form 1118.	366,084	83,676	167,353	0						

^{*}Important: See Computer-Generated Schedule J in instructions.

Tax Year 2023 1120 MeF ATS Scenario 3

Schedule J (Form 1118) (Rev. 12-2020)

Part	Part II Year-End Balances of Future Separate Limitation Income That Must Be Recharacterized (section 904(f)(5)(C))								
		(i) Section 951A income	(ii) Foreign branch income	(iii) Passive category income	(iv) General category income	(v) Other income* (identify ▶)	(vi) U.S. income		
а	Section 951A income								
b	Foreign branch income								
С	Passive category income								
d	General category income	71,416	16,324	32,647					
е	Other income* (identify ►)								
Part	III Overall Foreign Loss Account B	alances (section 9	04(f)(1)) Complete f	_{or} each separate li	mitation income cat	egory.			
1	Beginning balance		,						
2	Current year additions								
3	Current year reductions (other than recapture)	()	()	()	()	()			
4	Current year recapture (from Part I, line 7)	()	((()	()			
5	Ending balance—Combine lines 1 through 4.								
Part		Balances (section	904(g)(1))						
1	Beginning balance								
2	Current year additions								
3	Current year reductions (other than								
	recapture)	()	()	()	()	()			
4	Subtotal - Combine lines 1 through 3.								
5	Current year recapture (from Part I, line 10)								
6	Ending balance —Subtract line 5 from line 4.								

*Important: See Computer-Generated Schedule J in instructions.

Schedule J (Form 1118) (Rev. 12-2020)

1120 MeF ATS Scenario 3

Information Return of U.S. Persons With Respect to Certain Foreign Corporations

Tax Year 2023

Go to www.irs.gov/Form5471 for instructions and the latest information.

Attachme	ent	
•		404

OMB No. 1545-0123

Department of the Treasury Internal Revenue Service

(Rev. December 2023

Information furnished for the foreign corporation's annual accounting period (tax year required by section 898) (see instructions) beginning , 20 23 , and ending Jan 01

Sequence No. 121 Name of person filing this return A Identifying number Anywork Finance Incorporated 00-000003 B Category of filer (See instructions. Check applicable box(es).): Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address) 1a 1b 1c 2 3 4 5a 5b 5c 35 Any Street City or town, state, and ZIP code C Enter the total percentage of the foreign corporation's voting stock you owned at the end of its annual accounting period Anytown, NY 10006 100% Filer's tax year beginning January 01 , 20 23 , and ending December 31 , 20 23

D Check box if this is a final Form 5471 for the foreign corporation **E** Check if any excepted specified foreign financial assets are reported on this form (see instructions) F Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40

G If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions)

H Person(s) on whose behalf this information return is filed: (4) Check applicable box(es) (3) Identifying number (1) Name (2) Address Shareholder Officer Director

Important: Fill in all applicable lines and schedules. All information must be in English. All amounts must be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation b(1) Employer identification number, if any 00-0000045 b(2) Reference ID number (see instructions) ABC1234 b(3) Previous reference ID number(s), if any (see instructions)

Foreign Finance Corporation 75 Any Street Birmingham, England 126375

d Date of incorporation | e Principal place of business

Country under whose laws incorporated

h Functional currency code

f Principal business activity code number 01/01/1990 523900 Financial Investment **GBP**

2 Provide the following information for the foreign corporation's accounting period stated above.

b If a U.S. income tax return was filed, enter: a Name, address, and identifying number of branch office or agent (if any) in the United States (i) Taxable income or (loss) (ii) U.S. income tax paid (after all credits) Samuel Addams 75 Any Street Birmingham, England 126375

 ${\bf c}$ Name and address of foreign corporation's statutory or resident agent in country of incorporation

d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation, and the location of such books and records, if different

g Principal business activity

Schedule A Stock of the Foreign Corporation

	(b) Number of shares issued and outstanding				
(a) Description of each class of stock	(i) Beginning of annual accounting period	(ii) End of annual accounting period			
Common	750	1,000			
Preferred	193,710	258,280			

October 05, 2023 Form 5471 (Rev. 12-2023)

Tax Year 2023 1120 MeF ATS Scenario 3

Form 5471 (Rev. 12-2023)

Schedule B Shareholders of Fore					
Part I U.S. Shareholders of Fo	reign Co	prporation (see instructions)			
(a) Name, address, and identifying number of shareholder	sha	escription of each class of stock held by reholder. Note: This description should match the corresponding description entered in Schedule A, column (a).	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period	(e) Pro rata share of subpart F income (enter as a percentage)
	Common		750	1,000	
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003					
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003	Class B I	Preferred	193,710	258,280	
Part II Direct Shareholders of F	oreign	Corporation (see instructions)	<u> </u>		
(a) Name, address, and identifying number of sha Also, include country of incorporation or formation, if applicable.		(b) Description of each class of stock hel Note: This description should match the description entered in Schedule A,	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period	
		I .		1	I .

Form 5471 (Rev. 12-2023) Page **3**

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. generally accepted accounting principles (GAAP). Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for dollar approximate separate transactions method (DASTM) corporations.

				Functional Currency	U.S. Dollars
	1a	Gross receipts or sales	1a		
	b	Returns and allowances	1b		
	С	Subtract line 1b from line 1a	1c		_
	2	Cost of goods sold	2		
	3	Gross profit (subtract line 2 from line 1c)	3		_
ø)	4	Dividends	4		
Ě	5	Interest	5	28,862,341	42,689,456
Income	6a	Gross rents	6a	14,988,962	22,169,741
=	b	Gross royalties and license fees	6b		
	7	Net gain or (loss) on sale of capital assets	7		
	8a	Foreign currency transaction gain or loss—unrealized	8a		
	b	Foreign currency transaction gain or loss—realized	8b		
	9	Other income (attach statement)	9		
	10	Total income (add lines 3 through 9)	10	43,851,303	64,859,197
	11	Compensation not deducted elsewhere	11		
	12a	Rents	12a	2,588,175	3,828,095
<u>ග</u>	b	Royalties and license fees	12b		
Deductions	13	Interest	13	36,977	54,692
nct	14	Depreciation not deducted elsewhere	14		
edi	15	Depletion	15		
Ω	16	Taxes (exclude income tax expense (benefit))	16	121	179
	17	Other deductions (attach statement—exclude income tax expense (benefit))	17	556,318	822,834
	18	Total deductions (add lines 11 through 17)	18	3,181,591	4,705,800
4	19	Net income or (loss) before unusual or infrequently occurring items, and			
Net Income		income tax expense (benefit) (subtract line 18 from line 10)	19	40,669,712	60,153,397
<u>0</u>	20	Unusual or infrequently occurring items	20	(12,818,965)	(18,960,161)
÷ ÷	21a	Income tax expense (benefit)—current	21a		
S	b	Income tax expense (benefit)—deferred	21b		
	22	Current year net income or (loss) per books (combine lines 19 through 21b)	22	27,850,747	41,193,236
<u>×</u>	23a	Foreign currency translation adjustments	23a		
ens	b	Other	23b		
Other prehen income	С	Income tax expense (benefit) related to other comprehensive income .	23c		
Other Comprehensive Income	24	Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c)	24		

Form **5471** (Rev. 12-2023)

Tax Year 2023 1120 MeF ATS Scenario 3

Form 5471 (Rev. 12-2023) Page **4**

Schedule F Balance Sheet

Important: Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

	Assets	(a) Beginning of annual accounting period	(b) End of annual accounting period
1	Cash	8,557,500	3,281,502
2a	Trade notes and accounts receivable	855,858	15,006,554
b	Less allowance for bad debts	()()
3	Derivatives		
4	Inventories		
5	Other current assets (attach statement)	255,108	243,012
6	Loans to shareholders and other related persons	26,569,964	
7	Investment in subsidiaries (attach statement)		
8	Other investments (attach statement)	57,437	36,820,277
9a	Buildings and other depreciable assets		
b	Less accumulated depreciation	()()
10a	Depletable assets		
b	Less accumulated depletion	()()
11	Land (net of any amortization)		<u> </u>
12	Intangible assets:		
а	Goodwill		
b	Organization costs		
С	Patents, trademarks, and other intangible assets	11,727,492	21,085,517
d	Less accumulated amortization for lines 12a, 12b, and 12c	()()
13	Other assets (attach statement)		
14	Total assets	48,023,359	76,436,862
	Liabilities and Shareholders' Equity	40,023,337	70,430,002
15	Accounts payable		68,312
16	Other current liabilities (attach statement)	4,001,670	5,080,202
17	Derivatives	1,001,070	0,000,202
18	Loans from shareholders and other related persons		
19	Other liabilities (attach statement)	2,016,428	1,247,422
20	Capital stock:	2,010,420	1,277,722
a	Preferred stock	57,545,333	76,727,110
b	Common stock	750,000	1,000,000
21	Paid-in or capital surplus (attach reconciliation)	730,000	1,000,000
22	Retained earnings		
23	Less cost of treasury stock	(16,290,072)(7,686,184)
24	Total liabilities and shareholders' equity	48,023,359	76,436,862
	dule G Other Information	40,023,337	70,430,002
1 2	During the tax year, did the foreign corporation own at least a 10% interest, directly of partnership?		
3	During the tax year, did the foreign corporation own any foreign entities that were distributed their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign cobranches (see instructions)? If "Yes," you are generally required to attach Form 8858 for each entity or branch (see in	orporation own any f	oreign
4a	During the tax year, did the filer pay or accrue any base erosion payment under sec corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with payment made or accrued to the foreign corporation (see instructions)?	ction 59A(d) to the forespect to a base e	rosion
b	Enter the total amount of the base erosion payments	\$	
С	Enter the total amount of the base erosion tax benefits	\$	
5a	During the tax year, did the foreign corporation pay or accrue any interest or royalty for allowed under section 267A?		
b	Enter the total amount of the disallowed deductions (see instructions)	\$	5474

Form 5471 (Rev. 12-2023) Page **5**

Schedule G Other Information (continued) Yes No 6a Is the filer claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any ✓ If "Yes," complete lines 6b, 6c, and 6d. See instructions. **b** Enter the amount of gross receipts derived from all sales of general property to the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) . . . \$ c Enter the amount of gross receipts derived from all sales of intangible property to the foreign corporation that the d Enter the amount of gross receipts derived from all services provided to the foreign corporation that the filer During the tax year, was the foreign corporation a participant in any cost sharing arrangement? 1 If the answer to question 7 is "Yes," complete a separate Schedule G-1 for each cost sharing arrangement in which the foreign corporation was a participant during the tax year. From April 25, 2014, to December 31, 2017, did the foreign corporation purchase stock or securities of a shareholder of the foreign corporation for use in a triangular reorganization (within the meaning of Regulations 9a Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(d) annual income inclusion for the tax year? If "Yes," go to line 9b. b Enter in functional currency the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for 10 During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section ✓ If "Yes," see instructions and attach statement. 11 During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations / If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G). During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under 12 13 During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended? 14 If "Yes," enter the corresponding code(s) from the instructions and attach statement Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)? 15 Does the foreign corporation have previously disallowed interest expense under section 163(i) carried forward to 16 ✓ 17a Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year b If the answer to question 17a is "Yes," was an election made to close the tax year such that no amount is treated as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)? Did the reporting corporation have any loan to or from the foreign corporation (i.e., the related party) to which the / b Did the reporting corporation have any loan to or from the foreign corporation (i.e., the related party) for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the applicable Federal rate (AFR) for the relevant term)? ✓ 19a Did the filer of this Form 5471 make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the tax year, or, during the period beginning 36 months before the date of the respective distribution or acquisition and ending 36 months afterward, did the filer issue or refinance indebtedness owed to ✓ **b** If the answer to question 19a is "Yes," provide the following.

Tax Year 2023 1120 MeF ATS Scenario 3

Form 5471 (Rev. 12-2023) Page **6**

Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name	of U.S. shareholder Identifying number				
1a					
h	(see instructions)	1a 1b		43,66	08,620
b		ID			
С	Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c			
d	Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d			
е	Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A)	1e			
f	Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	1f			
g	Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A) .	1g			
h	Other subpart F income (enter result from Worksheet A)	1h			
2	Earnings invested in U.S. property (enter the result from Worksheet B)	2			
3	Reserved for future use	3			
4	Factoring income	4			
	See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.				
5a	Section 245A eligible dividends (see instructions)	5a			
b	Extraordinary disposition amounts (see instructions)	5b			
С	Extraordinary reduction amounts (see instructions)	5c			
d	Section 245A(e) dividends (see instructions).	5d			
е	Dividends not reported on line 5a, 5b, 5c, or 5d	5e			
6	Exchange gain or (loss) on a distribution of previously taxed earnings and profits	6			
				Yes	No
7a	Was any income of the foreign corporation blocked?				
b	Did any such income become unblocked during the tax year (see section 964(b))?				
If the	answer to either question is "Yes," attach an explanation.				
8a	Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign con	porati	on at		
	any time during the tax year (see instructions)?				
b	If the answer to question 8a is "Yes," enter the U.S. shareholder's ED account balance at the beginning	of the	CFC	/ear	
	\$ and at the end of the tax year \$ Provide an attachment detailin	g any	chang	es fror	n the
	beginning to the ending balances.				
С	Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of	the C	FC ye	ar	
	\$ and at the end of the tax year \$. Provide an attachment detailin				n the
	beginning to the ending balances.		Ū		
9	Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions) \$			

1120 MeF ATS Scenario 3 Information Return of U.S. Persons With Respect to Certain Foreign Corporations

Tax Year 2023

(Rev. December 2023)

Go to www.irs.gov/Form5471 for instructions and the latest information.

 Attachment	

OMB No. 1545-0123

Sequence No. 121

Department of the Treasury Internal Revenue Service Information furnished for the foreign corporation's annual accounting period (tax year required by section 898) (see instructions) beginning $Jan\ 01$, 20 23, and ending $Dec\ 31$, 20 23

	30011011030) (300	o iniditidotido ida	cgiiiiiig Jairu	, 20	25 , a	ina channg	DEC 31	, 20 23		
Name of person filing this re	eturn				A Iden	tifying numbe	r			
Anywork Finance Incor	rporated						00-	-0000003		
Number, street, and room or su		mber if mail is not de	elivered to street addres	ss)	B Cate	gory of filer (Se	e instructio	ns. Check ap	plicable box(e	s).):
35 Any Street					1a 1b 1c 2 4 3 4 5a 5b 5c					
City or town, state, and ZIP	code				C Ente	r the total perc	entage of th	e foreign cor	poration's voti	ng
Anytown, NY 10006					stoc	k you owned a	t the end of	its annual ac	counting perio	d 100%
Filer's tax year beginning	January 0°	1 , 20 2	23 , and ending	Dece	ember	31 .2	20 23			
D Check box if this is a fina										П
E Check if any excepted sp				e instruction	ons) .					· . ¬
F Check the box if this Forr										.
G If the box on line F is che										
H Person(s) on whose beha						,				
								(4) Ch	eck applicable	box(es)
(1) Nam	e		(2) Address			(3) Identifyin	ig number	Shareholder		Director
								Ondronoldo.	Onicol	Director
Important Fill in all	annliachla linea	and ashadular	All information	n must l	ho in	English All	amaunta	must ho	otated in I	I C dollara
Important: Fill in all a	applicable lilles herwise indicated		s. Ali IIIIOIIIIalioi	ii iiiust k	Je III	Eligiisti. Ali	arriourits	illust De	Stated III C	J.S. UUIIAIS
1a Name and address of		<i>.</i>					h(1) Emr	lover identifi	cation number,	if any
ia Name and address of	orcigir corporation						D(I) LINE	,	,	ii diriy
							h(2) Pofe		1000046 Inber (see instru	ictions)
							D(Z) Neie		•	ictions)
							. (2) 5		C8989	
								rious referenc uctions)	e ID number(s)	, if any (see
							11130	dotions)		
Foreign Sands							_			
80 Any Street							c Cou	ntry under wh	nose laws inco	porated
Birmingham, England	126375						NL			
d Date of incorporation	e Principal place of	business	f Principal business code number	s activity	gl	Principal busin	ess activity	h	Functional curr	ency code
			Code number							
01/01/1990	nl		52390	0	Fir	nancial Inves	tment	EUR		
2 Provide the following in	nformation for the for	eign corporation's	accounting period s	tated above	e.					
a Name, address, and id	entifying number of b	oranch office or ag	ent (if any) in the	b If a U.S	3. incom	ne tax return wa	as filed, ent	er:		
United States				(i)	Taxabl	e income or (lo	ss)		J.S. income tax	
									(after all credit	s)
c Name and address of	foreign corporation's	statutory or reside	ent agent in country	d Name a	and add	dress (including	corporate	department,	f applicable) o	f person (or
of incorporation				1 '	,	custody of the			e foreign corpo	ration, and
				trie ioca	ation of	such books ar	ia recoras,	ii dillerent		
George Washington										
80 Any Street Amsterdam, Netherland	ds									
Schedule A Stoc	k of the Forei	an Corporat	ion							
2.00	2: 2::0 : 0:01;	5 : 2 : p : a :				(b) Number	of shares is	sued and out	standing	
(a)	Description of each	class of stock			(i) Pa~					ıal
(α)						inning of annua ounting period	ai .		ii) End of annu ccounting peri	
Common										
Common Professed						20,000			40,000	
Preferred						200,000			400,000	

October 05, 2023 Form 5471 (Rev. 12-2023) Page **2**

Schedule B Shareholders of Fore					
Part I U.S. Shareholders of Fo	reign Co	prporation (see instructions)			
(a) Name, address, and identifying number of shareholder	sha	(b) Description of each class of stock held by shareholder. Note: This description should match the corresponding description entered in Schedule A, column (a). (c) Number of shares held at beginning of annua accounting period			(e) Pro rata share of subpart F income (enter as a percentage)
	Common		20,000	40,000	
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003					
	Preferred	1	200,000	400,000	
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003					
Part II Direct Shareholders of F	oreign (Corporation (see instructions)			
(a) Name, address, and identifying number of sha Also, include country of incorporation or formation, if applicable.		(b) Description of each class of stock hell Note: This description should match the description entered in Schedule A,	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period	

Form 5471 (Rev. 12-2023) Page **3**

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. generally accepted accounting principles (GAAP). Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for dollar approximate separate transactions method (DASTM) corporations.

				Functional Currency	U.S. Dollars
	1a	Gross receipts or sales	1a	10,000,000	10,000,000
	b	Returns and allowances	1b		
	С	Subtract line 1b from line 1a	1c		
	2	Cost of goods sold	2	8,000,000	8,000,000
	3	Gross profit (subtract line 2 from line 1c)	3	2,000,000	2,000,000
ø.	4	Dividends	4		
Ĕ	5	Interest	5		
Income	6a	Gross rents	6a		
=	b	Gross royalties and license fees	6b	400,000	400,000
	7	Net gain or (loss) on sale of capital assets	7		
	8a	Foreign currency transaction gain or loss—unrealized	8a		
	b	Foreign currency transaction gain or loss—realized	8b		
	9	Other income (attach statement)	9		
	10	Total income (add lines 3 through 9)	10	2,400,000	2,400,000
	11	Compensation not deducted elsewhere	11		
	12a	Rents	12a		
દ	b	Royalties and license fees	12b	200,000	200,000
jo	13	Interest	13		
Deductions	14	Depreciation not deducted elsewhere	14	1,000,000	1,000,000
þ	15	Depletion	15		
	16	Taxes (exclude income tax expense (benefit))	16		
	17	Other deductions (attach statement—exclude income tax expense (benefit))	17		
	18	Total deductions (add lines 11 through 17)	18	1,200,000	1,200,000
•	19	Net income or (loss) before unusual or infrequently occurring items, and			
Net Income		income tax expense (benefit) (subtract line 18 from line 10)	19	1,200,000	1,200,000
ဝ	20	Unusual or infrequently occurring items	20		
<u>+</u>	21a	Income tax expense (benefit)—current	21a	240,000	240,000
Š	b	Income tax expense (benefit)—deferred	21b		
	22	Current year net income or (loss) per books (combine lines 19 through 21b)	22	960,000	960,000
šive	23a	Foreign currency translation adjustments	23a		
ens ne	b	Other	23b		
Other prehen ncome	С	Income tax expense (benefit) related to other comprehensive income .	23c		
Other Comprehensive Income	24	Other comprehensive income (loss), net of tax (line 23a plus line 23b less			
ပိ		line 23c)	24		474

Form **5471** (Rev. 12-2023)

If "Yes," complete line 5b.

b Enter the total amount of the disallowed deductions (see instructions)

Tax Year 2023 1120 MeF ATS Scenario 3

Form 5471 (Rev. 12-2023) Page **4**

Schedule F Balance Sheet

Important: Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

	Assets	(a) Beginning of annual accounting period accounting	(b) End of annual ecounting period
1	Cash	1	3 1
2a		a	
b	Less allowance for bad debts	b ()()
3	Derivatives	3	
4	Inventories	4	
5	Other current assets (attach statement)	5	
6	· · · · · · · · · · · · · · · · · · ·	6	
7	· · · · · · · · · · · · · · · · · · ·	7	
8	` <i>'</i>	3	
9a	Buildings and other depreciable assets	a 1.000.000	1,000,000
b	· · · · · · · · · · · · · · · · · · ·	b ()()
10a	·	Da T	,
b	· ·	Ob ()()
11		1	•
12	Intangible assets:		
а		2a	
b		2b	
С		2c	
d		2d ()()
13		3	,
14		4 1,000,000	1,000,000
	Liabilities and Shareholders' Equity		· · ·
15	Accounts payable	5	
16	Other current liabilities (attach statement)	6	
17	Derivatives	7	
18	Loans from shareholders and other related persons	8	
19	Other liabilities (attach statement)	9	
20	Capital stock:		
а	Preferred stock	Da	
b	Common stock	Ob	
21	· · · · · · · · · · · · · · · · · · ·	1	
22	_	1,000,000	1,000,000
23		3 ()()
24	1 7	1,000,000	1,000,000
Sche	dule G Other Information		
			Yes No
1	During the tax year, did the foreign corporation own at least a 10% interest, direct		
	partnership?		. 🗸
•	If "Yes," see the instructions for required statement.		
2	During the tax year, did the foreign corporation own an interest in any trust?		
3	During the tax year, did the foreign corporation own any foreign entities that were		
	their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign		
	branches (see instructions)?		
_	If "Yes," you are generally required to attach Form 8858 for each entity or branch (see	•	
4a	During the tax year, did the filer pay or accrue any base erosion payment under		
	corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) we payment made or accrued to the foreign corporation (see instructions)?		
	payment made or accrued to the foreign corporation (see instructions)?		
L	If "Yes," complete lines 4b and 4c.	¢	
b	Enter the total amount of the base erosion payments	φ	_
C Fo			
5a	During the tax year, did the foreign corporation pay or accrue any interest or royalty allowed under section 267A?		

Form 5471 (Rev. 12-2023) Page **5**

Schedule G Other Information (continued) Yes No 6a Is the filer claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any ✓ If "Yes," complete lines 6b, 6c, and 6d. See instructions. **b** Enter the amount of gross receipts derived from all sales of general property to the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) . . . \$ c Enter the amount of gross receipts derived from all sales of intangible property to the foreign corporation that the d Enter the amount of gross receipts derived from all services provided to the foreign corporation that the filer During the tax year, was the foreign corporation a participant in any cost sharing arrangement? 1 If the answer to question 7 is "Yes," complete a separate Schedule G-1 for each cost sharing arrangement in which the foreign corporation was a participant during the tax year. From April 25, 2014, to December 31, 2017, did the foreign corporation purchase stock or securities of a shareholder of the foreign corporation for use in a triangular reorganization (within the meaning of Regulations 9a Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(d) annual income inclusion for the tax year? If "Yes," go to line 9b. b Enter in functional currency the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for 10 During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section ✓ If "Yes," see instructions and attach statement. 11 During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations / If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G). During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under 12 13 During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended? 14 If "Yes," enter the corresponding code(s) from the instructions and attach statement Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)? 15 Does the foreign corporation have previously disallowed interest expense under section 163(i) carried forward to 16 ✓ 17a Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year b If the answer to question 17a is "Yes," was an election made to close the tax year such that no amount is treated as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)? Did the reporting corporation have any loan to or from the foreign corporation (i.e., the related party) to which the / b Did the reporting corporation have any loan to or from the foreign corporation (i.e., the related party) for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the applicable Federal rate (AFR) for the relevant term)? ✓ 19a Did the filer of this Form 5471 make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the tax year, or, during the period beginning 36 months before the date of the respective distribution or acquisition and ending 36 months afterward, did the filer issue or refinance indebtedness owed to ✓ **b** If the answer to question 19a is "Yes," provide the following.

Tax Year 2023 1120 MeF ATS Scenario 3

Form 5471 (Rev. 12-2023) Page **6**

Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name	of U.S. shareholder Identifying number				
1a	3				
	(see instructions)	1a			
b	Section 245A(e)(2) subpart F income from hybrid dividends of tiered corporations (see instructions) .	1b			
С	Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c		16	50,000
d	Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d			
е	Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A)	1e			
f	Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	1f			
g	Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A) .	1g			
h	Other subpart F income (enter result from Worksheet A)	1h			
2	Earnings invested in U.S. property (enter the result from Worksheet B)	2			
3	Reserved for future use	3			
4	Factoring income	4			
	See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.				
5a	Section 245A eligible dividends (see instructions)	5a			
b	Extraordinary disposition amounts (see instructions)	5b			
С	Extraordinary reduction amounts (see instructions)	5c			
d	Section 245A(e) dividends (see instructions).	5d			
е	Dividends not reported on line 5a, 5b, 5c, or 5d	5e			
6	Exchange gain or (loss) on a distribution of previously taxed earnings and profits	6			
				Yes	No
7a	Was any income of the foreign corporation blocked?				
b	Did any such income become unblocked during the tax year (see section 964(b))?				
If the a	answer to either question is "Yes," attach an explanation.				
8a	Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign con	rporati	on at		
	any time during the tax year (see instructions)?				
b	If the answer to question 8a is "Yes," enter the U.S. shareholder's ED account balance at the beginning	of the	CFC y	/ear	
	\$ and at the end of the tax year \$ Provide an attachment detailin	g any	chang	es fror	n the
	beginning to the ending balances.				
С	Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of	the C	FC yea	ar	
	\$ and at the end of the tax year \$ Provide an attachment detailin	g any	chang	es fror	n the
	beginning to the ending balances.				
9	Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions)) \$			

October 05, 2023 SCHEDULE E

1120 MeF ATS Scenario 3

Income, War Profits, and Excess Profits Taxes Paid or Accrued

Tax Year 2023

(Rev. December 2021) Department of the Treasury

(Form 5471)

► Attach to Form 5471.

► Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Internal I	Revenue Service												
Name of	person filing Form 5471										Identifyin	g numbe	r
Anywor	k Finance Incorporated											00-0	000003
Name of	foreign corporation								EIN (if any)		Reference	e ID num	ber (see instructions)
Foreign	Finance Corporation								00-000	0045		AB	C1234
а	Separate Category (Enter	r code-see instruction	ons.)								•		GEN
b	If code 901j is entered or	n line a, enter the cou	ntry code for the	sanction	ed coun	ıtry (see iı	nstructio	ons) . .			▶		
	If one of the RBT codes i				he treat	y country	y (see ins	structio	ns)		🕨		
Part		a Foreign Tax Cre											
Section	n 1 — Taxes Paid or Acc	crued Directly by Fo	reign Corporation										
	Na	(a) ame of Payor Entity		(b) EIN or Re ID Nun of Payor	ference nber	(c) Unsuspend Taxes	(E	Enter code	(d) r U.S. Possession ch Tax Is Paid -see instructions. arate line for each.)	(e) Foreign Tax Yea Entity to Which (Year/Mont	Fax Relates	l to V	(f) x Year of Payor Entity Which Tax Relates 'ear/Month/Day)
1	Foreign Finance Corporati	ion		00-000	0045				UK	2023/01	/01		2023/12/31
2													
3													
4													
	(g) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(h) If taxes are paid on U.S. source income, check box	(i) Local Curren Which Tax Is P (enter code—see ir	ayable	(in loca	(j) Paid or Accal currency is tax is paya	in which		(k) Conversion Rate to U.S. Dollars	(divide colu	(I) U.S. Dollars vide column (j) y column (k))		(m) unctional Currency oreign Corporation
1	0		GBP			7	7,969,922	2	0.6761		11,788,082		7,969,922
2													
3													
4													
5	Total (combine lines 1 the	rough 4 of column (I)).	Also report amo	ount on So	chedule	E-1, line	4		🕨		11,788,082		
6	Total (combine lines 1 the	rough 4 of column (m)								▶		7,969,922
	n 2 - Taxes Deemed Pa												
	Name of Lower-Ti	(a) ier Distributing Foreign Corp	ooration	(b) EIN or Ref Number of I Distributing Corpor	Lower-Tier g Foreign			.S. Posses	(c) ssion to Which Tax Is Pass. Use a separate line for		(d) PTEP Group (enter code)	A	(e) Annual PTEP Account (enter year)
1													
2													
3													
4													
	(f) PTEP Distrib (enter amount in functi		Total Amount of P (in functi	(g) PTEP in the Fional currence		ıp			(h) of the PTEP Group Taxe t to PTEP Group (USD)	s to	PTEP and not	t Previous	perly Attributable sly Deemed Paid column (h)) (USD)
1													
2													
3													
4													
5	Total (combine lines 1 the	rough 4 of column (i)).	Also report amo	ount on So	chedule	E-1, line	6			•			

Tax Year 2023 1120 MeF ATS Scenario 3

Schedule E (Form 5471) (Rev. 12-2021) Page 2 Name of foreign corporation EIN (if any) Reference ID number (see instructions) Foreign Finance Corporation 00-0000045 ABC1234 a Separate Category (Enter code – see instructions.) GEN c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) Election Part II For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment? If "Yes," state date of election ▶ Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.) Part III (g) EIN or Reference (c) (h) (i) Section 901(k) Suspended Name of Payor Entity ID Number Section 901(i) Section 901(m) U.S. Taxes Other Total and (I) Taxes of Payor Entity 1 2 In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions)) Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation Taxes related to: IMPORTANT: Enter amounts in U.S. dollars. (b) (a) (d) (c) Subpart F Income Tested Income Residual Income Suspended Taxes Balance at beginning of year (as reported in prior year Schedule E-1) -0--0-1a b C 2 3a b Taxes reported on Schedule E, Part I, Section 1, line 5, column (I) 4 11.788.082 5 Taxes reported on Schedule E, Part I, Section 2, line 5, column (i) 6 8 Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c 11.788.082 Taxes deemed paid with respect to inclusions (see instructions) 9 10 11 Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P 12 Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c)) 13 14 15 Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), 16 and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12 -0--0-

Tax Year 2023 1120 MeF ATS Scenario 3

	00.000.00,			•	00. /0	500::a::0 0				
Schedule	E (Form 5471) (Rev.	12-2021)								Page 3
Name of	foreign corporation						EIN (if any)		Reference ID num	ber (see instructions)
Foreign	Finance Corpora	tion					00-0	000045	AB	C1234
а	Separate Catego	ry (Enter code-	see instructions.)						. •	GEN
b	If code 901j is en	ntered on line a, e	enter the country c	ode for the sanct	tioned country (se	e instructions) .			. •	
			d on line a, enter th							
Sche	dule E-1 Ta	axes Paid, Acc	rued, or Deeme	ed Paid on Acc	umulated Earn	ings and Profit	s (E&P) of Fore	ign Corporation	on (continued)	
			_	(e) Taxes	related to previo	usly taxed E&P	(see instructions)			
	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a										
b										
С										
2										
3a										
b										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16			1	1	1			1		

Schedule E (Form 5471) (Rev. 12-2021)

1120 MeF ATS Scenario 3

Income, War Profits, and Excess Profits Taxes Paid or Accrued

Tax Year 2023

(Rev. December 2021)
Department of the Treasury

SCHEDULE E

(Form 5471)

► Attach to Form 5471.

► Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Internal F	Revenue Service												
Name of	person filing Form 5471										Identifyin	g number	
Anywor	k Finance Incorporated											00-000000)3
Name of	foreign corporation								EIN (if any)		Reference	e ID number (se	e instructions)
	Sands								00-000			ABC8989)
	Separate Category (Ent										🕨	G	EN
	If code 901j is entered of	,	•			٠,		,			🕨		
	If one of the RBT codes				he treat	y cour	ntry (se	ee instruct	ions)		🕨		
Part		h a Foreign Tax Cr											
Section	n 1 — Taxes Paid or A	ccrued Directly by F	oreign Corporati										
	ı	(a) Name of Payor Entity		(b) EIN or Re ID Nun of Payor	ference nber	(c Unsusp Tax	ended	(Enter co	(d) y or U.S. Possession Which Tax Is Paid ade—see instructions. eparate line for each.)	Foreign Tax Ye Entity to Which (Year/Mon	Tax Relates	U.S. Tax Year to Which (Year/Mo	(f) r of Payor Entity Tax Relates onth/Day)
1	Foreign Sands			00-000	0046				NL	2023/0	1/01	2023	/12/31
2													
3													
4													
	(g) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(h) If taxes are paid on U.S. source income, check box	(i) Local Curren Which Tax Is F (enter code—see ir	ayable	(in loca	l curren	Accrued acy in who ayable)		(k) Conversion Rate to U.S. Dollars	(I) In U.S. D (divide co by colun	umn (j)	In Function	m) nal Currency Corporation
1	1,000,00	00	EUR				20	0,000	1.00000		200,000		200,000
2													
3													
4													
	Total (combine lines 1 t										200,000		
6	Total (combine lines 1 t	hrough 4 of column (r	n))								<u> ►</u>		200,000
Section	n 2 — Taxes Deemed I	Paid by Foreign Corp	oration		,								
	Name of Lower-	(a) Tier Distributing Foreign Co	rporation	EIN or Refi Number of I Distributing Corpor	Lower-Tier g Foreign	(Ente			(c) session to Which Tax Is F ions. Use a separate line		(d) PTEP Group (enter code)		(e) PTEP Account nter year)
1													
2													
3													
4													
	(f) PTEP Distr (enter amount in fund		Total Amount of F (in functi	(g) PTEP in the Fional currence		р			(h) It of the PTEP Group Tax ect to PTEP Group (USD)	es to	PTEP and no	(i) Faxes Properly A t Previously Dee mn (g)) x column	emed Paid
1													
2													
3													
4	<u></u>	1 1 4 6 1 20	\ A1			<u> </u>							
5	Total (combine lines 1 t	nrough 4 of column (i)). Also report amo	ount on So	cnedule	Ŀ- 1, li	ine 6			. 🕨			

Tax Year 2023 1120 MeF ATS Scenario 3

Schedule E (Form 5471) (Rev. 12-2021) Page 2 Name of foreign corporation EIN (if any) Reference ID number (see instructions) Foreign Sands 00-0000046 ABC8989 a Separate Category (Enter code – see instructions.) GEN c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) Election Part II For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment? If "Yes," state date of election ▶ Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.) Part III (g) EIN or Reference (c) (h) (i) Section 901(k) Suspended Name of Payor Entity ID Number Section 901(i) Section 901(m) U.S. Taxes Other Total and (I) Taxes of Payor Entity 1 2 In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions)) Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation Taxes related to: IMPORTANT: Enter amounts in U.S. dollars. (b) (a) (d) (c) Subpart F Income Tested Income Residual Income Suspended Taxes Balance at beginning of year (as reported in prior year Schedule E-1) -0--0-1a b C 2 3a b Taxes reported on Schedule E, Part I, Section 1, line 5, column (I) 4 200.000 5 Taxes reported on Schedule E, Part I, Section 2, line 5, column (i) 6 8 Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c Taxes deemed paid with respect to inclusions (see instructions) 9 140.000 10 11 Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P . . . 12 60.000 Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c)) 13 14 15 Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), 16 and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12 -0--0-

Tax Year 2023 1120 MeF ATS Scenario 3

Schedule E (Form 5471) (Rev. 12-2021)

Name of	foreign corporation						EIN (if any)		Reference ID number (see instructions)			
Foreigr	n Sands						00-00	000046	ABO	C8989		
а	Separate Categor	ry (Enter code-s	ee instructions.)						. •	GEN		
b	If code 901j is ent	tered on line a, er	nter the country c	ode for the sanct	ioned country (se	e instructions) .			. •			
С	If one of the RBT	codes is entered	on line a, enter th	ne country code f	or the treaty cour	ntry (see instruction	ons)		. •			
Sche	dule E-1 Ta	xes Paid, Accr	ued, or Deeme	d Paid on Acci	umulated Earni	ngs and Profits	s (E&P) of Fore	ign Corporatio	n (continued)			
				(e) Taxes	related to previo	usly taxed E&P (see instructions)					
	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP		
1a	150,000	25,000										
b												
С												
2												
3a												
b												
4												
5												
6												
7												
8												
9												
10	150,000	25,000										
11												
12	0	0										
13												
14												
15												
16												

Schedule E (Form 5471) (Rev. 12-2021)

1120 MeF ATS Scenario 3

Income, War Profits, and Excess Profits Taxes Paid or Accrued

Tax Year 2023

(Rev. December 2021)

SCHEDULE E

(Form 5471)

► Attach to Form 5471. Department of the Treasury Internal Revenue Service ▶ Go to www.irs.gov/Form5471 for instructions and the latest information. OMB No. 1545-0123

Name of	person filing Form 5471													Identifying	g numb	oer	
Anywo	rk Finance Incorporated														00-	-0000003	
Name of	foreign corporation									E	EIN (if any)			Reference	e ID nu	mber (see instru	ctions)
Foreigr	n Sands										00-00	00046			Α	BC8989	
а	Separate Category (Enter	r code-see instr	ructions	s.)										. ▶		PAS	
b	If code 901j is entered on	n line a, enter the	countr	ry code for the	sanction	ed cou	ntry (se	e instr	uction	ıs) . .				. •			
С	If one of the RBT codes is	s entered on line	a, ente	er the country o	code for t	the trea	ty cour	ntry (se	e inst	ructions	s)			. •			
Part	Taxes for Which	a Foreign Tax	Credi	it Is Allowed													
Sectio	n 1 — Taxes Paid or Acc	crued Directly by	y Forei	ign Corporation	on												
	Na	(a) ame of Payor Entity			(b) EIN or Re ID Nur of Payor	eference mber	(c) Unsusp Tax	ended	(Ent	ter code-	(d) J.S. Possession Tax Is Paid see instructions. te line for each.)	Foreigr Entity to (Ye	(e) n Tax Year o Which Ta ear/Month,	r of Payor ax Relates /Day)	U.S. to	(f) Tax Year of Payo Which Tax Rela (Year/Month/Da	r Entity ites y)
1	Foreign Sands				00-000	00046] [NL			2023/12/	31		2023/12/31	
2																	
3																	
4																	
	(g) (h) (i) (j) (k) (k) (l) (l) (k) (l) (l) (k) (l) (k) (l) (k) (l) (l) (l) (l) (l) (l) (l) (l) (l) (l																
1	0			EUR				40	0,000		1.0000	0		40,000			40,000
2																	
3																	
4																	
5	Total (combine lines 1 thr	rough 4 of colum	ın (l)). A	Also report amo	ount on S	chedule	e E-1, li	ne 4 .			🕨			40,000			
6	Total (combine lines 1 thr	rough 4 of colum	ın (m))											. ▶			40,000
Sectio	n 2 — Taxes Deemed Pa	aid by Foreign C	orpora	ation													
	Name of Lower-Ti	(a) er Distributing Foreigr	n Corpor	ration	(k EIN or Ref Number of Distributin Corpo	Lower-Tie ng Foreign	er				e) ion to Which Tax Is Use a separate line			(d) TEP Group enter code)		(e) Annual PTEP A (enter yea	
1																	
2																	
3																	
4																	
	(f) PTEP Distribu (enter amount in function			Total Amount of P (in function	(g) TEP in the F onal currence		up				(h) the PTEP Group Ta: o PTEP Group (USC		to P	TEP and not	t Previo	Properly Attributa ously Deemed Pa x column (h)) (US	iid
1																	
2																	
3																	
4																	
5	Total (combine lines 1 thr	rough 4 of colum	ın (i)). A	Also report amo	ount on S	chedule	E-1, li	ne 6 .				. ▶					

Tax Year 2023 1120 MeF ATS Scenario 3

Schedule	E (Form 5471) (Rev. 12-2021)									Page ∠
Name of	foreign corporation					EIN (if any	/)		Reference ID nu	mber (see instructions)
Foreign	Sands						00-000	0046	A	BC8989
а	Separate Category (Enter code-see inst	ructions.)							▶	PAS
b	If code 901j is entered on line a, enter the	e country code fo	or the sanctioned	d country (see instr	uctions) .				•	
С	If one of the RBT codes is entered on line	e a, enter the cou	intry code for the	e treaty country (se	ee instructio	ns) .			•	
Part I	Election									
For tax	years beginning after December 31, 2004	4, has an electior	n been made un	der section 986(a)(1)(D) to trar	slate taxe	es using th	ne exchange i	ate on the date o	f payment?
	Yes No If "Yes," state d	ate of election ▶								
Part I	Taxes for Which a Foreign Tax	Crodit le Disc	llowed (Enter	in functional our	conov of fo	roian oo	rnoration	1		
raiti	Taxes for which a Foreign rax		illowed (Enter		ency or ic	reign co	ιροιαιίοι	.)		
	(a)	(b) EIN or Reference	(c)	(d)	(e)			(g)	(h)	(i)
	Name of Payor Entity	ID Number	Section 901(j)	Section 901(k) and (l)	Section 901(m) U.S	raxes	Suspended Taxes	Other	Total
_		of Payor Entity		\'\		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \				
2										
	In functional currency (combine lines 1 or	2d 0/								
	In functional currency (combine lines 1 ar In U.S. dollars (translated at the average	,								
	dule E-1 Taxes Paid, Accrued, o									
Scrie	dule E-T Taxes Paid, Accrued, C	or Deemed Pai	u on Earnings	s and Pronts (Ed	(P) OI FOR	eign Cor	poration	Taxes relat	and to:	
MPOR	TANT: Enter amounts in U.S. dollars.					_				
						a) F Income		(b) I Income	(c) Residual Income	(d) Suspended Taxes
10	Palanas at haginning of year (as reports	d in prior year Co	shadula E 1\)-		0-	-0-	Caoponaca Taxoo
1a	Balance at beginning of year (as reporte)- 	_	0-	-0-	
b	Beginning balance adjustments (attach s	statement)								
c	Adjusted beginning balance (combine lin									
2	Adjustment for foreign tax redetermination	UII								
3a	Taxes unsuspended under anti-splitter r	ules			•					
b	Taxes suspended under anti-splitter rule	S								
4	Taxes reported on Schedule E, Part I, Se					40,000)			
5	Taxes carried over in nonrecognition trai									
6	Taxes reported on Schedule E, Part I, Se									
7 8								-		
O	Taxes paid or accrued on current incom									
0	through 7)					40.000				
9	Taxes deemed paid with respect to inclus					40,000) 			
10	Taxes deemed paid with respect to acturate Taxes on amounts reclassified to section									
11 12	0.1. /							+		
	Other (attach statement)									
13										
14	Reserved for future use									
15	Reduction for other taxes not deemed p									
16	Balance of taxes paid or accrued at the b	peginning of the n	ext year. Line 16	6, columns (a), (b),						
	and (c) must always equal zero. So, if necolumns (a), (b), and (c) in amounts suffic									
	zero. For the remaining columns, combin					,			0	
	Lero. For the remaining columns, combin	e mies o trirougn	14		· -()-	1 -	0-	-0-	

Tax Year 2023 1120 MeF ATS Scenario 3

Schedule E (Form 5471) (Rev. 12-2021)

Name of	foreign corporation	•					EIN (if any)		Reference ID num	ber (see instructions)
Foreign	Sands						00-00	000046	ABO	C8989
		ory (Enter code – s	see instructions.)						. ▶	PAS
			nter the country co							
			d on line a, enter th							
	dule E-1 Ta	axes Paid, Acci	rued, or Deeme	d Paid on Acc	umulated Earni	ngs and Profit	s (E&P) of Fore	ign Corporatio	n (continued)	
		•			related to previo				,	
	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a										
b										
С										
2										
3a										
b										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										

Schedule E (Form 5471) (Rev. 12-2021)

October 05, 2023 SCHEDULE H | (Form 5471)

Tax Year 2023 1120 MeF ATS Scenario 3 **Current Earnings and Profits**

(Rev. December 2021) Department of the Treasury Internal Revenue Service

Name of person filing Form 5471

► Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Identifying number

	ork Finance Incorporated	1						0000003
	f foreign corporation	EIN	(if any)			Reference	D nui	mber (see instructions)
oreig	n Finance Corporation		00	-0000045			Αl	BC1234
MPO	RTANT: Enter the amounts on lines 1 through 5c in function	onal c	urrency.					
1	Current year net income or (loss) per foreign books of acc	count					1	27,850,747
2	Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):		Net Add	ditions	Net Subtr	actions		
а	Capital gains or losses	2a						
b	Depreciation and amortization	2b						
С	Depletion	2c						
d	Investment or incentive allowance	2d		355,647				
е	Charges to statutory reserves	2e						
f	Inventory adjustments	2f						
g	Income taxes (see Schedule E, Part I, Section 1, line 6,							
	column (m), and Part III, line 3, column (i))	2g				113,140		
h	Foreign currency gains or losses	2h						
i	Other (attach statement)	2i		1,946,284		515,184		
3	Total net additions	3		2,301,931				
4	Total net subtractions	4				628,324		
5a	Current earnings and profits (line 1 plus line 3 minus line 4	1) .					5a	29,524,354
b	DASTM gain or (loss) for foreign corporations that use DA	STM	(see instru	ctions)		[5b	
С	Combine lines 5a and 5b and enter the result on line 5c. through 5c(iii)(D) the portion of the line 5c amount with r on those lines	espec		ategories			5c	29,524,354
	(i) General category (enter amount on applicable Scheline 3, column (a))			5c(i)	29	9,524,354		
	(ii) Passive category (enter amount on applicable Sche line 3, column (a))			5c(ii)				
	(iii) Section 901(j) category:							
	(A) Enter the country code of the sanctioned country							
	and enter the line 5c amount with respect to t country on this line 5c(iii)(A) and on the applicable Part I, line 3, column (a)	le Sch	nedule J,	5c(iii)(A)				
	(B) Enter the country code of the sanctioned country							
	and enter the line 5c amount with respect to t country on this line 5c(iii)(B) and on the applicab Part I, line 3, column (a)	le Sch	nedule J,	5c(iii)(B)				
	(C) Enter the country code of the sanctioned country			/				
	and enter the line 5c amount with respect to t country on this line 5c(iii)(C) and on the applicab Part I, line 3, column (a)	he sa le Sch	nedule J,	5c(iii)(C)				
	(D) Enter the country code of the sanctioned country			- (-)(-)				
	and enter the line 5c amount with respect to t country on this line 5c(iii)(D) and on the applicab Part I, line 3, column (a)	he sa le Sch	nedule J,	5c(iii)(D)				
d	Current earnings and profits in U.S. dollars (line 5c tradefined in section 989(b)(3) and the related regulations (see	nslate e inst	ed at the a tructions))	average e	exchange r		5d	43,668,620
е	Enter exchange rate used for line 5d			▶		0.6761		
D-	parwork Paduction Act Notice see instructions	_		0147				rm 5471\ (Dov. 10.001\

October 05, 2023 SCHEDULE H |

Name of person filing Form 5471

Tax Year 2023 1120 MeF ATS Scenario 3 **Current Earnings and Profits**

(Form 5471) ► Attach to Form 5471. (Rev. December 2021) Department of the Treasury Internal Revenue Service

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Identifying number

	ork Finance Incorporated						00-	0000003	
Name c	f foreign corporation	EIN	l (if any)			Reference	ference ID number (see instructions)		
Foreig	n Sands		00	0-0000046					
IMPO	RTANT: Enter the amounts on lines 1 through 5c in function	onal c	currency.						
1	Current year net income or (loss) per foreign books of acc	count					1	960,000	
2	Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):		Net Ad	ditions	Net Subtr	actions			
а	Capital gains or losses	2a							
b	Depreciation and amortization	2b							
С	Depletion	2c							
d	Investment or incentive allowance	2d							
е	Charges to statutory reserves	2e							
f	Inventory adjustments	2f							
g	Income taxes (see Schedule E, Part I, Section 1, line 6, column (m), and Part III, line 3, column (i))	2g							
h	Foreign currency gains or losses	2h							
i	Other (attach statement)	2i							
3	Total net additions	3							
4	Total net subtractions	4							
5a	Current earnings and profits (line 1 plus line 3 minus line						5a	960,000	
b	DASTM gain or (loss) for foreign corporations that use DA	ASTM	(see instru	uctions)			5b		
С	Combine lines 5a and 5b and enter the result on line 5c. through 5c(iii)(D) the portion of the line 5c amount with on those lines						5c	960,000	
	(i) General category (enter amount on applicable Scheline 3, column (a))			5c(i)		800,000			
	(ii) Passive category (enter amount on applicable Scheline 3, column (a))	edule	J, Part I,	5c(ii)		160,000			
	(A) Enter the country code of the sanctioned country								
	and enter the line 5c amount with respect to t country on this line 5c(iii)(A) and on the applicab Part I, line 3, column (a)	he sa	hedule J,	5c(iii)(A)					
	(B) Enter the country code of the sanctioned country	•		(// /					
	and enter the line 5c amount with respect to t country on this line 5c(iii)(B) and on the applicab Part I, line 3, column (a)	he sa	hedule J,	5c(iii)(B)					
	(C) Enter the country code of the sanctioned country								
	and enter the line 5c amount with respect to t country on this line 5c(iii)(C) and on the applicab Part I, line 3, column (a)	he sa le Sc	hedule J,	5c(iii)(C)					
	(D) Enter the country code of the sanctioned country	•							
	and enter the line 5c amount with respect to t country on this line 5c(iii)(D) and on the applicab Part I, line 3, column (a)	le Sc	hedule J,	5c(iii)(D)					
d	Current earnings and profits in U.S. dollars (line 5c tra	nslate	ed at the			ate, as			
e	defined in section 989(b)(3) and the related regulations (se Enter exchange rate used for line 5d	ee ins	tructions))				5d	960,000	
	perwork Reduction Act Notice, see instructions.							rm 5471) (Rev. 12-2021)	

October 05, 2023 SCHEDULE I-1

Tax Year 2023 1120 MeF ATS Scenario 3

(Form 5471)

Information for Global Intangible Low-Taxed Income

(Rev. December 2021)

Department of the Treasury Internal Revenue Service

► Attach to Form 5471.

► Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name o	of person filing Form 5471			Identifying number				
Anyw	ork Finance Incorporated			00-000003				
Name o	of foreign corporation	')		Reference ID number (see instructions)				
Foreig	gn Sands		00-	-0000046	ABC8989			
	Separate Category (Enter code–see instructions.)				▶	GEN		
				Functional Currency	Conversion Rate	U.S. Dollars		
1	Gross income (see instructions if cost of goods sold exceed receipts)	_	1	2,000,000				
2	Exclusions (see instructions if cost of goods sold exceed gross re	eceipts)						
а	Effectively connected income 2a							
b	Subpart F income 2b							
С	High-tax exception income per section 954(b)(4) 2c							
d	Related party dividends 2d							
e	Foreign oil and gas extraction income . 2e							
3	Total exclusions (combine lines 2a through 2e)		3	0				
4	Gross income less total exclusions (line 1 minus line 3							
	instructions)		4	2,000,000				
5	Deductions properly allocable to amount on line 4		5	1,200,000				
6	Tested income (loss) (line 4 minus line 5) (see instructions) .		6	800,000	1.0	800,000		
7	Tested foreign income taxes		7	200,000	1.0	200,000		
8	Qualified business asset investment (QBAI)		8	100,000	1.0	100,000		
9a	Interest expense included on line 5 9a							
b	Qualified interest expense 9b							
С	Tested loss QBAI amount 9c							
d	Tested interest expense (line 9a minus the sum of line 9b ar							
	9c). If zero or less, enter -0		9d					
10a	Interest income included in line 4 10a							
b	Qualified interest income							
С	Tested interest income (line 10a minus line 10b). If zero o							
	enter -0		10c					
For Pa	perwork Reduction Act Notice, see instructions.	Cat. No	. 7140	MC	Schedule I-1 (Form	n 5471) (Rev. 12-2021)		

October 05, 2023 SCHEDULE J (Form 5471)

Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation

(Rev. December 2020)

Department of the Treasury Internal Revenue Service

► Attach to Form 5471.

OMB No. 1545-0123

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name	of person filing Form 5471							Identifying numb	per	
Anyv	ork Finance Incorporated							00-	0000003	
Name	of foreign corporation				EIN (if any)	1		Reference ID nu	mber (see instructions)	
Forei	gn Finance Corporation					00-0000045		ABC1234		
а	Separate Category (Enter code—see instructions.) .							. ▶	GEN	
b	If code 901j is entered on line a, enter the country cod	le for the sanctioned	d country (see instru	ctions)				. •		
Par	t I Accumulated E&P of Controlled Foreign (Corporation								
	Check the box if person filing return does not have all U.S	3. shareholders' infor	mation to complete a	an amount i	n column	(e) (see instructions	3).			
Important: Enter amounts in functional currency.		(a) Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E Previously (pre-1987 : 959(c)(3) b	&P Not Taxed section	(d) Hovering Deficit and Deduction for Suspended Taxes	(i) Re	Previously Taxed I classified section 965(a) PTEP	E&P (see instructions) (ii) Reclassified section 965(b) PTEP	
1a	Balance at beginning of year (as reported on prior year Schedule J)			69	,100,775					
b	Beginning balance adjustments (attach statement)									
С	Adjusted beginning balance (combine lines 1a and 1b)			69	,100,775					
2a	Reduction for taxes unsuspended under anti-splitter rules									
b	Disallowed deduction for taxes suspended under anti-splitter rules									
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)	29,524,354								
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation									
5a	E&P carried over in nonrecognition transaction.									
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction									
6	Other adjustments (attach statement)									
7	Total current and accumulated E&P (combine lines 1c through 6)	29,524,354		69	,100,775					
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P	-29,524,354								
9	Actual distributions									
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P									
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)									
12	Other adjustments (attach statement)									
13	Hovering deficit offset of undistributed post-transaction E&P (see instructions)									
14	Balance at beginning of next year (combine lines 7 through 13)			69	,100,775					

October 05, 2023 Schedule J (Form 5471) (Rev. 12-2020) Page 2

Part I	Accumulated E&P of Co	ntrolled	Foreign Corporation (continued)			
		(e) Previously Taxed E8			(see instructions)		
	(iii) General section 959(c)(1) PTEP	<i>(iv)</i> Red	classified section 951A PTEP	(v) Reclassified sec	tion 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP
1a							
b							
С							
2a							
b							
3							
4							
5a							
b							
6							
7							
8							
9							
10							
11							
12							
13							
14			(e) Previously Taxed E&P	(accinate rations)			(6)
							(f) Total Section 964(a) E&P (combine columns (a), (b), (c),
	(viii) Section 951A PTEP		(ix) Section 245A(d) PTEP	(x) Se	ction 951(a)(1)(A) PTEP	and (e)(i) through (e)(x))
1a							69,100,775
b							
С							69,100,775
2a							
b							20 524 254
3 4							29,524,354
5a							
b							
6							
7							98,625,129
8						29,524,354	70,020,127
9						27,227,237	
10							
11							
12							
13							
14						29,524,354	98,625,129

October 05, 2023 Schedule J (Form 5471) (Rev. 12-2020)

Tax Year 2023 1120 MeF ATS Scenario 3

Page 3

			9
Par	Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))		-
Impo	rtant: Enter amounts in functional currency.		
1	Balance at beginning of year	1	
2	Additions (amounts subject to future recapture)	2	
3	Subtractions (amounts recaptured in current year)	3	
4	Balance at end of year (combine lines 1 through 3)	4	

Schedule J (Form 5471) (Rev. 12-2020)

October 05, 2023 SCHEDULE J (Form 5471)

Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation

(Rev. December 2020)

Department of the Treasury Internal Revenue Service

► Attach to Form 5471.

OMB No. 1545-0123

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name	of person filing Form 5471						Identifying num	ber
Any	vork Finance Incorporated						00	-0000003
Vame	of foreign corporation				EIN (if any)	Reference ID n	umber (see instructions)
Fore	ign Sands					00-000046	A	BC8989
	Separate Category (Enter code—see instructions.) .							GEN
	If code 901j is entered on line a, enter the country cod		d country (see instruc	ctions)			▶	
Pai	Accumulated E&P of Controlled Foreign	Corporation						
	Check the box if person filing return does not have all U.S.	5. shareholders' infor	mation to complete a	an amount	in columr	(e) (see instructions	s).	
lmpo	ortant: Enter amounts in functional currency.	(a)	(b)	(c)		(d)	(e) Previously Taxed	E&P (see instructions)
important. Enter amounts in functional currency.		Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)		Hovering Deficit and Deduction for Suspended Taxes	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)						3,000,000	
b	Beginning balance adjustments (attach statement)							
С	Adjusted beginning balance (combine lines 1a and 1b)						3,000,000	
2a	Reduction for taxes unsuspended under anti-splitter rules							
b	Disallowed deduction for taxes suspended under anti-splitter rules							
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)	800,000						
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation							
5a	E&P carried over in nonrecognition transaction.							
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction							
6	Other adjustments (attach statement)							
7	Total current and accumulated E&P (combine lines 1c through 6)	800,000					3,000,000	
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P	-700,000						
9	Actual distributions						-3,000,000	
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P							
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)							
12	Other adjustments (attach statement)							
13	Hovering deficit offset of undistributed post-transaction E&P (see instructions)							
14	Balance at beginning of next year (combine lines 7 through 13)	100,000					0	

October 05, 2023 Schedule J (Form 5471) (Rev. 12-2020) Page **2**

Part I	Accumulated E&P of Co	ntrolled F	oreign Corporation (c	continued)					
	(iii) General section 959(c)(1) PTEP (iv) Re		(iii) General section 959(c)(1) PTEP (iv) Reclassified section 951A PTEP			(v) Reclassified sect	ion 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP
1a							500,000		
b									
С							500,000		
2a									
b									
3									
4									
5a									
b									
6									
7							500,000		
8							500,000		
9							-500,000		
10									
11 12									
13									
14							0		
-			(e) Previously Taxed E&P (s	see instructions)					
	(viii) Section 951A PTEP		(ix) Section 245A(c		<i>(x)</i> Se	ction 951(a)(1)(A) PTEP	(f) Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))		
1a							3,500,000		
b									
С							3,500,000		
2a									
b									
3							800,000		
4									
5a									
b									
6									
7		700.000					4,300,000		
8		700,000					3 500 000		
9 10							-3,500,000		
11									
12									
13									
14		700.000					800.008		

Tax Year 2023 1120 MeF ATS Scenario 3

Schedule J (Form 5471) (Rev. 12-2020)

			9
Par	Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))		-
Impo	rtant: Enter amounts in functional currency.		
1	Balance at beginning of year	1	
2	Additions (amounts subject to future recapture)	2	
3	Subtractions (amounts recaptured in current year)	3	
4	Balance at end of year (combine lines 1 through 3)	4	

Schedule J (Form 5471) (Rev. 12-2020)

Tax Year 2023 1120 MeF ATS Scenario 3

SCHEDULE J (Form 5471)

Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation

(Rev. December 2020)

Department of the Treasury Internal Revenue Service

► Attach to Form 5471.

OMB No. 1545-0123

► Go to www.irs.gov/Form5471 for instructions and the latest information.

Vame	of person filing Form 5471							Identifying numb	per
Any۱	work Finance Incorporated							00-	-0000003
Vame	of foreign corporation				EIN (if any	/)		Reference ID nu	mber (see instructions)
Fore	ign Sands					00-0000046	А	ABC8989	
а	Separate Category (Enter code—see instructions.) .							. •	PAS
b	If code 901j is entered on line a, enter the country cod	e for the sanctioned	d country (see instruc	ctions)				. •	
Pa	rt I Accumulated E&P of Controlled Foreign (Corporation							
	Check the box if person filing return does not have all U.S	6. shareholders' infor	mation to complete a	an amount	in columi	n (e) (see instructions	5).		
lmno	ortant: Enter amounts in functional currency.	(a)	(b)	(c)		(d)	(e)	Previously Taxed I	E&P (see instructions)
important. Enter amounts in functional currency.		Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)		Hovering Deficit and Deduction for Suspended Taxes		classified section 65(a) PTEP	(ii) Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)								
	Beginning balance adjustments (attach statement)								
С	Adjusted beginning balance (combine lines 1a and 1b)								
2a	Reduction for taxes unsuspended under anti-splitter rules								
b	Disallowed deduction for taxes suspended under anti-splitter rules								
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)	160,000							
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation								
5a	E&P carried over in nonrecognition transaction.								
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction								
6	Other adjustments (attach statement)								
7	Total current and accumulated E&P (combine lines 1c through 6)	160,000							
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P	-160,000							
9	Actual distributions								
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P								
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)								
12	Other adjustments (attach statement)								
13	Hovering deficit offset of undistributed post-transaction E&P (see instructions)								
14	Balance at beginning of next year (combine lines 7 through 13)	0							

October 05, 2023 Schedule J (Form 5471) (Rev. 12-2020) Page 2

Part I	Accumulated E&P of Co	ntrolled	Foreign Corporation (continued)				
		(e) Previously Taxed E&F			c (see instructions)			
	(iii) General section 959(c)(1) PTEP	<i>(iv)</i> Re	classified section 951A PTEP	(v) Reclassified sec	tion 245A(d) PTEP	(vi) Section 965(a) PTEP		(vii) Section 965(b) PTEP
1a								
b								
С								
2a								
b								
3								
4								
5a								
b								
6								
7								
8								
9								
10								
11								
12								
13								
14							1	
			(e) Previously Taxed E&P ((see instructions)	I			(f) Total Section 964(a) E&P (combine columns (a), (b), (c),
	(viii) Section 951A PTEP		(ix) Section 245A(d) PTEP	(x) Se	ction 951(a)(1)(A) PTEP		(combine columns (a), (b), (c), and (e)(i) through (e)(x))
1a								
b								
С								
2a								
b								
3								160,000
4								
5a							-	
b								
6								1/0.000
7						1/0.000		160,000
8						160,000		
9								
10 11								
12								
13								
14						160,000		160,000
17					I	100,000	1	100,000

Tax Year 2023 1120 MeF ATS Scenario 3

Schedule J (Form 5471) (Rev. 12-2020)

			9
Par	Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))		-
Impo	rtant: Enter amounts in functional currency.		
1	Balance at beginning of year	1	
2	Additions (amounts subject to future recapture)	2	
3	Subtractions (amounts recaptured in current year)	3	
4	Balance at end of year (combine lines 1 through 3)	4	

Schedule J (Form 5471) (Rev. 12-2020)

Version A, Cycle 3

October 05, 2023 SCHEDULE M Tran

2023 1120 MeF ATS Scenario 3 Transactions Between Controlled Foreign Corporation and Shareholders or Other Related Persons

Tax Year 2023

(Rev. December 2021)
Department of the Treasury
Internal Revenue Service

(Form 5471)

► Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information

OMB No. 1545-0123

internal rievende cervice	30 to 10 min or 30 min or 10 min or			
Name of person filing Form 5471			Identifyin	g number
Anywork Finance Incorporated	d .			00-000003
Name of foreign corporation		EIN (if any)	Reference	e ID number (see instructions)
Foreign Finance, Incorporated		00-000045		ABC1234
Important: Complete a separate	e Schedule M for each controlled foreign corp	oration. Enter the totals for each typ	e of transa	action that occurred during

Important: Complete a **separate** Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during the annual accounting period between the foreign corporation and the persons listed in columns (b) through (f). All amounts must be stated in U.S. dollars translated from functional currency at the average exchange rate for the foreign corporation's tax year. See instructions.

	rs translated from functional currency at the av r the relevant functional currency and the exch	-		•		
	(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
	Sales of stock in trade (inventory)					
2	Sales of tangible property other than stock in trade					
3	Sales of property rights (patents, trademarks, etc.)					
4	Platform contribution transaction payments received					
5	Cost sharing transaction payments received					
6	Compensation received for technical, managerial, engineering, construction, or like services					
7	Commissions received					
8	Rents, royalties, and license fees received					
9	Hybrid dividends received (see instructions)					
10	Dividends received (exclude hybrid dividends, deemed distributions under subpart F, and distributions of previously taxed income) .					
11	Interest received					
12	Premiums received for insurance or reinsurance					
13	Loan guarantee fees received					
	Other amounts received (attach statement)					
	Add lines 1 through 14					
	Purchases of stock in trade (inventory) . Purchases of tangible property other than stock in trade					
18	Purchases of property rights (patents, trademarks, etc.)					
19	Platform contribution transaction payments paid					
20	Cost sharing transaction payments paid .					
21	Compensation paid for technical, managerial, engineering, construction, or like services .					
22	Commissions paid					
23	Rents, royalties, and license fees paid .					
24	Hybrid dividends paid (see instructions) .					
25	Dividends paid (exclude hybrid dividends paid)					
26	Interest paid					
27	Premiums paid for insurance or reinsurance					
28	Loan guarantee fees paid					
29	Other amounts paid (attach statement) .					
30	Add lines 16 through 29					

October 05, 2023 Schedule M (Form 5471) (Rev. 12-2021)

Tax Year 2023 1120 MeF ATS Scenario 3

chedule M (Form 5471) (Rev. 12-2021)

	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,						9- —
Name	e of person filing Form 5471					Identifying numb	oer
	(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	corporation or	co co than	0% or more U.S. chareholder of introlled foreign reporation (other in the U.S. person ing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
31	Accounts Payable						
32	Amounts borrowed (enter the maximum loan balance during the year)—see instructions						
33	Accounts Receivable						
34	Amounts loaned (enter the maximum loan balance during the year)—see instructions	46,001,741					

Schedule M (Form 5471) (Rev. 12-2021)

SCHEDULE 0 (Form 5471)

1120 MeF ATS Scenario 3 **Organization or Reorganization of Foreign Corporation, and Acquisitions and**

Dispositions of its Stock

Tax Year 2023

(Rev. December 2012) Department of the Treasury Internal Revenue Service

Name of person filing Form 5471

Name of foreign corporation

Anywork Finance, Incorporated

Foreign Finance Corporation

Information about Schedule O (Form 5471) and its instructions is at www.irs.gov/form5471

Attach to Form 5471.

EIN (if any)

00-0000045

OMB No. 1545-0704

00-000003

ABC1234

Reference ID number (see instructions)

Identifying number

Important: Complete a separate Sche	edule O for each fo	oreign (corporation	for whi	ch informati	on mu	st be re _l	ported.			
Part I To Be Completed by	J.S. Officers an	nd Dire	ectors								
(a) Name of shareholder for whom acquisition information is reported		(b)			(c) Identifying number of shareholder						dditional uisition
Name of shareholder for whom acquisition information is reported To Be Completed by work Finance, Incorporated To Be Completed by Note: If this return is requested of such persons and the of shareholder(s) filing this schedule Name, address, and identifying number of shareholder(s) filing this schedule	35 Any St., Ar	nytown	wn, NY10006		00-0000003		01/10/1990				
Part II To Be Completed by	J.S. Shareholde	ers									
Note: If this return is requ of such persons and the o	ired because one	or mor		lers bed	ame U.S. p	ersons	, attach	a list s	howing	the i	names
	Section A-	Genera	al Shareho	lder Inf	ormation						
		or shareho		(b) I.S. incom	e tax return file		te:		Date (if a		
	(1) Type of retu (enter form nu			(2) ite return filed Internal		(3) Revenue Service Center where filed		nter i			ction 6046 orporation
Anywork Finance, Incorporated	1120	1120		09/15/2023		Ogden					
Section B-U.	S. Persons Who	Are Of	ficers or Di	rectors	of the For	eign C	orporat	tion			
		(b Addı			Soc	(c	:) rity numbe	er	Che	ck apr box(oropriate
									Offic	cer	Director
	Section	on C-	Acquisition	of Sto	ck						
(a) Name of shareholder(s) filing this schedule	(b) Class of stock		(c) Date of	M	(d) lethod of				ares acqu	ired	
	acquired		cquisition		equisition	Dir	(1) ectly		(2) rectly	Cons	(3) structively
Anywork Finance, Incorporated	Common		2/31/2023	Purch			50				
Anywork Finance, Incorporated	Preferred	12	2/31/2023	Purch	ase	64	,570			1	

Tax Year 2023 1120 MeF ATS Scenario 3

Schedule O (Form 5471) (Rev. 12-2012)
Page 2

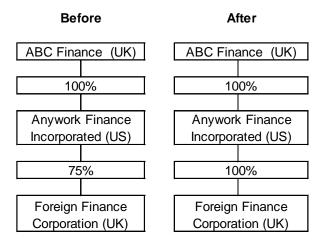
chedule 0 (Form 5471) (Nev. 12-2012)								rage Z
(f) Amount paid or value given		Name	and addres	(g) ss of person from who	n shares were acq	uired		
9,000,000	Mary Doe, 812 Ma	ple Street,	Somewhe	ere, MD 20901				
	Sectio	n D—Disp	oosition (of Stock				
(a)	(b)	(c)	(d)	Numbe	(e) er of shares	disposed of	
Name of shareholder disposing of stock	Class of stock	Date of dis	sposition	Method of disposition	(1) Directly	(2) Indirec	tly Con	(3) structively
(f) Amount received		Name an	d address o	(g) of person to whom disp	position of stock w	as made	<u>'</u>	
Section	n E—Organization	n or Reor	ganizatio	on of Foreign Co	rporation			
Name	(a) and address of transfe	eror			(b) Identifying numb	er (if any)	(c Date of t	
Assets tran	(d) esferred to foreign corp	ooration			Description of a	(e)	erred by or	notes or
(1) Description of assets	(2) Fair market va	alue	Adjusted ba	(3) asis (if transferor was J.S. person)	securities is	sued by, for	eign corpora	ation

Section F-Additional Information

- (a) If the foreign corporation or a predecessor U.S. corporation filed (or joined with a consolidated group in filing) a U.S. income tax return for any of the last 3 years, attach a statement indicating the year for which a return was filed (and, if applicable, the name of the corporation filing the consolidated return), the taxable income or loss, and the U.S. income tax paid (after all credits).
- **(b)** List the date of any reorganization of the foreign corporation that occurred during the last 4 years while any U.S. person held 10% or more in value or vote (directly or indirectly) of the corporation's stock ▶
- (c) If the foreign corporation is a member of a group constituting a chain of ownership, attach a chart, for each unit of which a shareholder owns 10% or more in value or voting power of the outstanding stock. The chart must indicate the corporation's position in the chain of ownership and the percentages of stock ownership (see instructions for an example).

Tax Year 2023 1120 MeF ATS Scenario 3

Anywork Finance Incorporated 00-0000003 F5471, Schedule O, Section F (C) Additional Information, Organizational Chart



Tax Year 2023 1120 MeF ATS Scenario 3

1120 MeF ATS S

Information Return of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business (Under Sections 6038A and 6038C of the Internal Revenue Code)

Go to www.ire gov/FormE/172 for instructions and the latest information

Go to www.irs.gov/Form5472 for instructions and the latest information.

Department of the Treasury Internal Revenue Service

(Rev. December 2023)

For tax year of the reporting corporation beginning 01/01 , 23 , and ending 12/31

ending 12/31 , 23

OMB No. 1545-0123

Note: Enter all information in English and money items in U.S. dollars. Reporting Corporation (see instructions). All reporting corporations must complete Part I. Part I 1b Employer identification number 1a Name of reporting corporation Anywork Finance Incorporated 00-000003 Number, street, and room or suite no. (If a P.O. box, see instructions.) 1c Total assets 35 Any Street City or town, state, and ZIP code (If a foreign address, see instructions.) \$ Anytown, NY 10006 250,306,361 1d Principal business activity International Finance 1e Principal business activity code 522293 1g Total number of Forms 5472 1f Total value of gross payments made or received 1h Total value of gross payments made or received reported on this Form 5472. See instructions. reported on all Forms 5472. See instructions. filed for the tax year \$ 5,000 1i Check here if this is a 1j Check here if this is the initial year for 1k Total number of Parts VIII 11 Country of incorporation attached to Form 5472 consolidated filing of which the U.S. reporting corporation Form 5472 is filing a Form 5472 US 1m Date of incorporation 10 Principal country(ies) where business is conducted 1n Country(ies) under whose laws the reporting corporation files an income tax return as a resident Check here if, at any time during the tax year, any foreign person owned, directly or indirectly, at least 50% of (a) the total voting power of all classes of the stock of the reporting corporation entitled to vote, or (b) the total value of all classes of stock of the reporting corporation ✓ Check here if the reporting corporation is a foreign-owned domestic disregarded entity (foreign-owned U.S. DE) treated as a corporation for purposes of section 6038A. See instructions Part II 25% Foreign Shareholder (see instructions) Check here if any direct (or ultimate indirect) 25% foreign shareholder listed in Part II is a surrogate foreign corporation under section 7874(a)(2)(B). 4a Name and address of direct 25% foreign shareholder ABC Finance Corporation, 13 Somewhere, Birmingham, UK 126375 4b(1) U.S. identifying number, if any 4b(2) Reference ID number (see instructions) 4b(3) Foreign taxpayer identification number (FTIN), if any (see instructions) 00-0000021 4c Principal country(ies) where 4d Country of citizenship, 4e Country(ies) under whose laws the direct 25% foreign business is conducted organization, or incorporation shareholder files an income tax return as a resident UK UK 5a Name and address of direct 25% foreign shareholder 5b(1) U.S. identifying number, if any 5b(2) Reference ID number (see instructions) 5b(3) FTIN, if any (see instructions) 5e Country(ies) under whose laws the direct 25% foreign 5c Principal country(ies) where 5d Country of citizenship, organization, or incorporation business is conducted shareholder files an income tax return as a resident 6a Name and address of ultimate indirect 25% foreign shareholder 6b(1) U.S. identifying number, if any 6b(2) Reference ID number (see instructions) 6b(3) FTIN, if any (see instructions) 6e Country(ies) under whose laws the ultimate indirect 25% foreign 6c Principal country(ies) where 6d Country of citizenship, business is conducted organization, or incorporation shareholder files an income tax return as a resident 7a Name and address of ultimate indirect 25% foreign shareholder 7b(1) U.S. identifying number, if any 7b(2) Reference ID number (see instructions) 7b(3) FTIN, if any (see instructions) 7c Principal country(ies) where 7d Country of citizenship, 7e Country(ies) under whose laws the ultimate indirect 25% foreign business is conducted shareholder files an income tax return as a resident organization, or incorporation

Tax Year 2023

October 05, 2023 1120 MeF ATS Scenario 3 Form 5472 (Rev. 12-2023) Related Party (see instructions). All reporting corporations must complete this question and the rest of Part III. Part III Check applicable box: Is the related party a foreign person or ☐ U.S. person? 8a Name and address of related party ABC Finance 13 Somewhere, Birmingham, UK 126375 8b(3) FTIN, if any (see instructions) 8b(2) Reference ID number (see instructions) **8b(1)** U.S. identifying number, if any 00-0000021 8d Principal business activity code 8c Principal business activity International Finance 8e Relationship—Check boxes that apply: Related to reporting corporation Related to 25% foreign shareholder 🗸 25% foreign shareholder 8f Principal country(ies) where business is conducted 8g Country(ies) under whose laws the related party files an income tax return as a UK IJК Part IV Monetary Transactions Between Reporting Corporations and Foreign Related Party (see instructions) Caution: Part IV must be completed if the "foreign person" box is checked in the heading for Part III. If estimates are used, check here. Sales of stock in trade (inventory) 9 9 10 Sales of tangible property other than stock in trade 10 11 Platform contribution transaction payments received 11 12 Cost sharing transaction payments received 12 Rents received (for other than intangible property rights) 13a 13a Rovalties received (for other than intangible property rights) 13b b 14 Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas) . 14 15 Consideration received for technical, managerial, engineering, construction, scientific, or like services 15 16 16 17 Amounts borrowed (see instructions) a Beginning balance 17b **b** Ending balance or monthly average 18 18 19 Premiums received for insurance or reinsurance . 19 20 Loan guarantee fees received 20 21 Other amounts received (see instructions). 21 22 Total. Combine amounts on lines 9 through 21 22 23 23 24 Purchases of tangible property other than stock in trade 24 25 Platform contribution transaction payments paid . . . 25 26 Cost sharing transaction payments paid 26 27a 27a Royalties paid (for other than intangible property rights) . . . 27b b 28 Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas) 28 29 Consideration paid for technical, managerial, engineering, construction, scientific, or like services 29 30 30 5,000 **b** Ending balance or monthly average 31 Amounts loaned (see instructions) a Beginning balance 31b 5,000 32 32 33 Premiums paid for insurance or reinsurance 33 34 34 35 Other amounts paid (see instructions) . . 35 Total. Combine amounts on lines 23 through 35 . . 36 36 5,000 Part V Reportable Transactions of a Reporting Corporation That Is a Foreign-Owned U.S. DE (see instructions)

Describe on an attached separate sheet any other transaction as defined by Regulations section 1.482-1(i)(7), such as amounts paid or received in connection with the formation, dissolution, acquisition, and disposition of the entity, including contributions to and distributions from the entity, and check here. Part VI Nonmonetary and Less-Than-Full Consideration Transactions Between the Reporting Corporation

and the Foreign Related Party (see instructions) Describe these transactions on an attached separate sheet and check here.

Tax Year 2023 1120 MeF ATS Scenario 3

October 05, 2023 Form 5472 (Rev. 12-2023) Page 3

Part	VII Additional Information. All reporting corporations must complete Part VII.		
37	Does the reporting corporation import goods from a foreign related party?	Yes	✓ No
38a	If "Yes," is the basis or inventory cost of the goods valued at greater than the customs value of the imported goods?		□ No
b	If "Yes," attach a statement explaining the reason or reasons for such difference.		
c	If the answers to guestions 37 and 38a are "Yes," were the documents used to support this treatment of the imported		
·	goods in existence and available in the United States at the time of filing Form 5472?	Yes	□No
39	During the tax year, was the foreign parent corporation a participant in any cost sharing arrangement (CSA)?	_	✓ No
09	If "Yes," complete Part VIII as instructed below.	□ 163	Ŭ NO
40a	During the tax year, did the reporting corporation pay or accrue any interest or royalty for which the deduction is not		
40a	allowed under section 267A? See instructions	☐ Yes	✓ No
b	If "Yes," enter the total amount of the disallowed deductions		
41a	Is the reporting corporation claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation? If "Yes," complete lines 41b, 41c, and 41d. See instructions	Yes	✓ No
b	Enter the amount of gross receipts derived from all sales of general property to the foreign related party that the reporting corporation included in its computation of foreign-derived deduction eligible income (FDDEI). See instructions \$		
С	Enter the amount of gross receipts derived from all sales of intangible property to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions		
d	Enter the amount of gross receipts derived from all services provided to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions		
42a	Did the reporting corporation have any loan to or from the related party, to which the safe-haven rate rules of Regulations section 1.482-2(a)(iii)(B) are applicable?	Yes	✓ No
b	Did the reporting corporation have any loan to or from the related party for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the applicable Federal rate (AFR) for the relevant term)?	☐ Yes	✓ No
43a	Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the tax year, or, during the period beginning 36 months before the date of the respective acquisition or distribution and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party?	☐ Yes	✓ No
b	If the answer to question 43a is "Yes," provide the following.		
	(1) The amount of such distribution(s) and acquisition(s)		
	(2) The amount of such related party indebtedness		
Part			
	Complete a separate Part VIII for each CSA in which the reporting corporation was a participant during the tax year. Report . (See instructions.)	all amount	s in U.S.
44	Provide a brief description of the CSA with respect to which this Part VIII is being completed.		
77	None		
	Notice		
45	During the course of the tax year, did the reporting corporation become a participant in the CSA?	Yes	√ No
46	Was the CSA in effect before January 5, 2009?	Yes	□ No
47	What was the reporting corporation's share of reasonably anticipated benefits for the CSA?		%
48a	Enter the total amount of stock-based compensation deductions claimed by the reporting corporation		
b	Enter the total amount of deductions for the tax year for stock-based compensation that was granted during the term of the CSA		
С	and, at date of grant, is directly identified with, or reasonably allocable to, the intangible development activity under the CSA \$ Was there any stock-based compensation granted during the term of the CSA to individuals who performed functions in		
	business activities that generate cost shared intangibles that was not treated as directly identified with, or reasonably allocable to, the intangible development activity?	☐ Yes	☐ No
49a	Enter the total amount of intangible development costs for the CSA		
b	Enter the amount of intangible development costs allocable to the reporting corporation based on the reporting corporation's reasonably anticipated benefits share		
Part		ons)	
50	Amounts defined as base erosion payments under section 59A(d)		
51	Amount of base erosion tax benefits under section 59A(c)(2)		
52	Amount of total qualified derivative payments as described in section 59A(h) made by the reporting corporation \$		
53	Reserved for future use		
55			

Tax Year 2023 1120 MeF ATS Scenario 3

Entity Classification Election

(Rev. December 2013)

OMB No. 1545-1516

	ent of the Treasury evenue Service	► Information about Form 8832 and its instructions is at www.irs.gov/fo	orm8832.					
	Name of eligib	ble entity making election	Employer identification number					
		ational Finance	00-000017					
Туре	Number, stree	et, and room or suite no. If a P.O. box, see instructions.						
or	1000 Helmstraat							
Prin	0.1, 0. 101111,	state, and ZIP code. If a foreign address, enter city, province or state, postal code and country. For	ollow the country's practice for entering the					
	postal code.							
► Ch		Limburg, Netherlands 6211TA dress change	×2000 41					
CII		dress change						
Part		n Information	100eddie 2010-32					
1	Type of electi	ion (see instructions):						
а		sification by a newly-formed entity. Skip lines 2a and 2b and go to line 3.						
b	☐ Change in	current classification. Go to line 2a.						
•								
2a	Has the eligibl	le entity previously filed an entity election that had an effective date within the	ne last 60 months?					
	Yes. Go to	a line 2h						
		ine 2b and go to line 3.						
		and go to or						
2b	Was the eligib	ole entity's prior election an initial classification election by a newly formed el	ntity that was effective on the date of					
	formation?							
	☐ Yes. Go to							
	□ No. Stop r	nere. You generally are not currently eligible to make the election (see instruc	ctions).					
3	Does the eligib	ble entity have more than one owner?						
	Dood the ongi.	sid strikly have more than one owner.						
	☐ Yes. You o	can elect to be classified as a partnership or an association taxable as a corpor	ration. Skip line 4 and go to line 5.					
	✓ No. You ca	an elect to be classified as an association taxable as a corporation or to be	disregarded as a separate entity. Go					
	to line 4.	·	· ,					
	16.11							
4	if the eligible e	entity has only one owner, provide the following information:						
а	Name of owne	er ► Anywork Finance Incorporated						
		mber of owner • 00-0000003						
	. ,	Tibel of owner > 100-0000000						
5		entity is owned by one or more affiliated corporations that file a consolidated	d return, provide the name and					
	employer iden	ntification number of the parent corporation:						
•	Name of name	nt corporation N						
a b		nt corporation ► ntification number ►						
D	Employer iden	ntification number ►						

Tax Year 2023 1120 MeF ATS Scenario 3

Form 8832 (Rev. 12-2013) Page **2**

ס וווו	52 (nev. 12-2015)	Page 2
Part	Election Information (Continued)	
6	Type of entity (see instructions):	
а	☐ A domestic eligible entity electing to be classified as an association taxable as	s a corporation.
b	☐ A domestic eligible entity electing to be classified as a partnership.	
С	A domestic eligible entity with a single owner electing to be disregarded as a	separate entity.
d	☐ A foreign eligible entity electing to be classified as an association taxable as a	corporation.
е	A foreign eligible entity electing to be classified as a partnership.	
f	✓ A foreign eligible entity with a single owner electing to be disregarded as a se	parate entity.
7	If the eligible entity is created or organized in a foreign jurisdiction, provide the for organization ► Netherlands	
8	Election is to be effective beginning (month, day, year) (see instructions)	▶12/31/2023
9	Name and title of contact person whom the IRS may call for more information	10 Contact person's telephone number
	Sam Brown, Tax Administrator	515-555-5550
	Consent Statement and Signature(s) (see ins	tructions)
nder	penalties of perjury, I (we) declare that I (we) consent to the election of the above-	named entity to be classified as indicated

Under penalties of perjury, I (we) declare that I (we) consent to the election of the above-named entity to be classified as indicated above, and that I (we) have examined this election and consent statement, and to the best of my (our) knowledge and belief, this election and consent statement are true, correct, and complete. If I am an officer, manager, or member signing for the entity, I further declare under penalties of perjury that I am authorized to make the election on its behalf.

Signature(s)	Date	Title
		0000

Tax Year 2023 1120 MeF ATS Scenario 3

1120 MeF ATS Scenario 3

8858

(Rev. September 2021)

Department of the Treasury

Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs)

► Go to www.irs.gov/Form8858 for instructions and the latest information.

Information furnished for the FDE's or FB's annual accounting period (see instructions)

OMB No. 1545-1910

Attachment Sequence No. 140

01/01 , 20 23, and ending Internal Revenue Service Filer's identifying number Name of person filing this return Anywork Finance Incorporated 00-000003 Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address) City or town, state, and ZIP code Anytown, NY 10006 Filer's tax year beginning 20 , and ending Important: Fill in all applicable lines and schedules. All information must be in English. All amounts must be stated in U.S. dollars unless otherwise indicated. FDE of a U.S. person FDE of a controlled foreign corporation (CFC) FDE of a controlled foreign partnership Check here FB of a U.S. person FB of a CFC FB of a controlled foreign partnership ✓ Initial Form 8858 Final Form 8858 Check here 1a Name and address of FDE or FB b(1) U.S. identifying number, if any DFF International Finance 00-0000017 1000 Helmstraat b(2) Reference ID number (see instructions) Maastricht, Limburg/Netherlands 6211TA c For FDE, country(ies) under whose laws organized and entity type under local tax law d Date(s) of organization e Effective date as FDE Netherlands Foreign Entity 12/30/2023 12/31/2023 f If benefits under a U.S. tax treaty were claimed with respect to g Country in which principal business h Principal business i Functional currency income of the FDE or FB, enter the treaty and article number activity is conducted activity Provide the following information for the FDE's or FB's accounting period stated above. a Name, address, and identifying number of branch office or agent (if any) in **b** Name and address (including corporate department, if applicable) of person(s) the United States with custody of the books and records of the FDE or FB, and the location of such books and records, if different For the tax owner of the FDE or FB (if different from the filer), provide the following (see instructions): a Name and address **b** Annual accounting period covered by the return (see instructions) **ABCDEF Finance Corporation** c(1) U.S. identifying number, if any 14 Somewhere 00-0000022 Birmingham, England 126375 c(2) Reference ID number (see instructions) d Country under whose laws organized e Functional currency For the direct owner of the FDE or FB (if different from the tax owner), provide the following (see instructions): a Name and address **b** Country under whose laws organized c U.S. identifying number, if any d Functional currency Attach an organizational chart that identifies the name, placement, percentage of ownership, tax classification, and country of organization of all entities in the chain of

ownership between the tax owner and the FDE or FB, and the chain of ownership between the FDE or FB and each entity in which the FDE or FB has a 10% or more

direct or indirect interest. See instructions.

Tax Year 2023

Form 9	October 05, 2023 1	120 MeF ATS Scenario 3				D
_	edule C Income Statement (see inst	ructions)				Page 2
lmpo dolla section speci	ortant: Report all information in functional rs translated from functional currency (using 989(b)). If the functional currency is the fact rules for FDEs or FBs that use U.S. dollar are using the average exchange rate (determined).	currency in accordance with U.S. GA og GAAP translation rules or the aver output outpu	age (Doll meth	exchange rate de lars column. See nod of accountin	etermine instruc g (DAST	ed unde tions fo M).
, 00	tare deling the average exertainge rate (acts	ministra di la ci cocción coc(2),, ci icon		Functional Currency		ollars
1 2	Gross receipts or sales (net of returns and allo		1 2	Tunctional Gurrency	0.0. L	, onar s
3 4 5	Gross profit (subtract line 2 from line 1) Dividends		3 4 5			
6 7	Gross rents, royalties, and license fees Gross income from performance of services		6			
8 9 10	Foreign currency gain (loss)		8 9 10			
11 12	Total deductions (exclude income tax expens Income tax expense	e)	11 12			
13 14 Sch	Other adjustments		13 14			
Con	Note: See the instructions if there are muthe FDE or FB.			(a) Amount stated in functional currency of FDE or FB	Amount functional	stated in currency of cient
1 2 3	Remittances from the FDE or FB Section 987 gain (loss) recognized by recipier Section 987 gain (loss) deferred under F	nt	1 2			
Ü	statement)		3		Yes	No
4	Were all remittances from the FDE or FB treat	ed as made to the direct owner?			✓	
5	Did the tax owner change its method of according the FDE or FB during the tax year? If "the change and new method of accounting."	Yes," attach a statement describing the	meth	od used prior to		√
	nedule F Balance Sheet					
acco	ortant: Report all amounts in U.S. dollars or rdance with U.S. GAAP. See instructions for	computed in functional currency and to or an exception for FDEs or FBs that	trans use [DASTM.		۵۱
	Asset		4	(a) Beginning of annual accounting period		annual ng period
1	Other		2			
2 3	Total assets		3			
	Liabilities and Ov	vner's Equity				
4 5	Liabilities		4			
6	Total liabilities and owner's equity		6			
	edule G Other Information			1	I	
1	During the tax year, did the FDE or FB own a	n interest in any trust?			Yes	No ✓

During the tax year, did the FDE or FB own at least a 10% interest, directly or indirectly, in any foreign

Answer only if the FDE made its election to be treated as disregarded from its owner during the tax year: Did the tax owner claim a loss with respect to stock or debt of the FDE as a result of the election? . . . During the tax year, did the FDE or FB pay or accrue any foreign tax that was disqualified for credit under During the tax year, did the FDE or FB pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended?

2

3

October 05, 2023
Form 8858 (Rev. 9-2021)
Schedule G Other Info 1120 MeF ATS Scenario 3

Tax Year 2023

Scn	edule G Other Information (continuea)	- 1	
6	Is the FDE or FB a qualified business unit as defined in section 989(a)?	Yes	No ✓
	Do not complete lines 7 and 8 if you are an individual who owns an FB or FDE directly or through tiers of FBs and FDEs.	of	
	7 Do and 7 Desi		
7a	During the tax year, did the FDE or FB receive, or accrue the receipt of, any amounts defined as base erosion payment under section 59A(d) or have a base erosion tax benefit under section 59A(c)(2) from a foreign person, which is a related party of the taxpayer? See instructions. If "Yes," complete lines 7	m	
	and 7c		√
c	Enter the total amount of the base erosion payments Enter the total amount of the base erosion tax benefit \$		
8a	During the tax year, did the FDE or FB pay, or accrue the payment of, any amounts defined as a bas erosion payment under section 59A(d) or have a base erosion tax benefit under section 59A(c)(2) to a foreign person, which is a related party of the taxpayer? See instructions. If "Yes," complete lines 8b and 8c	gn	✓
b c	Enter the total amount of the base erosion payments Enter the total amount of the base erosion tax benefit \$		
9	Answer only if the tax owner of the FDE or FB is a CFC: Were there any intracompany transactions between the FDE or FB and the CFC or any other branch of the CFC during the tax year, in which the FDE or FB acted as a manufacturing, selling, or purchasing branch?	В	
	Answer the remaining questions in Schedule G only if the tax owner of the FB or the interest in the FDE is U.S. corporation. Answer questions 10a through 11c if the tax owner of the FB or the interest in the FDE treated as a U.S. corporation solely for purposes of these questions.		
10a	If the FB or the interest in the FDE is a separate unit under Regulations section 1.1503(d)-1(b)(4), and is no part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii), does the separate unit have a dual consolidated loss as defined in Regulations section 1.1503(d)-1(b)(5)(ii)?	/e	✓
b	If "Yes," enter the amount of the dual consolidated loss	_)	
11a	If the FB or the interest in the FDE is a separate unit and part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii), does the combined separate unit have a dual consolidated loss a defined in Regulations section 1.1503(d)-1(b)(5)(ii)? If "Yes," complete lines 11b and 11c	as	√
b	Enter the amount of the dual consolidated loss for the combined separate unit ▶ \$ (_)	
С	Enter the net income (loss) attributed to the individual FB or the individual interest in the FDE as determine under Regulations section 1.1503(d)-5(c)(4)(ii)(A)	ed	
	Was any portion of the dual consolidated loss on line 10b or 11b taken into account in computing U.S taxable income for the year? If "Yes," go to line 12b. If "No," go to line 13		✓
b	Was this a permitted domestic use of the dual consolidated loss under Regulations section 1.1503(d)-6? "Yes," see the instructions and go to line 12c. If "No," go to line 12d		
С .	If "Yes," is the documentation that is required for the permitted domestic use under Regulations section 1.1503(d)-6 attached to the return? After answering this question, go to line 13a		
d	If this was not a permitted domestic use, was the dual consolidated loss used to compute consolidated taxable income as provided under Regulations section 1.1503(d)-4? If "Yes," go to line 12e Enter the separate unit's contribution to the cumulative consolidated taxable income		
е	("cumulative register") as of the beginning of the tax year ▶ \$ See instructions.		
13a	During the tax year, did any triggering event(s) occur under Regulations section 1.1503(d)-6(e) requiring recapture of any dual consolidated loss(es) attributable to the FB or interest in the FDE, individually or a part of a combined separate unit, in any prior tax years?	as	/
b	If "Yes," enter the total amount of recapture ▶\$. See instructions.		
Sch	edule H Current Earnings and Profits or Taxable Income (see instructions)		
	rtant: Enter the amounts on lines 1 through 6 in functional currency.		
1		1	
2		2	
3 4		3 4	
5		5	
6		6	
7	Current earnings and profits (or taxable income) in U.S. dollars (line 6 translated at the average exchange rate determined under section 989(b) and the related regulations (see instructions))	7	
8	Enter exchange rate used for line 7		

Tax Year 2023 1120 MeF ATS Scenario 3

Form 8858 (Rev. 9-2021)

Schedule L Transferred Loss Amount (see instructions)

Scried	iule i Ira	insierreu Loss	Amount (see	mstructions)					
mporta	ant: See instru	uctions for who	has to comple	ete this section.					
								Yes	No
	•	s of an FB (includes," go to line 2.	•	,		•			1
aı	n FB that is ar	ror a domestic con n FDE) to a speci	fied 10%-owner	ed foreign corpo	ration? If "No,"	stop here. If "\	es," go to		
	•	er the transfer, value in corporation? If					I		
in	structions .	ferred loss amou		•					
Sched	ule J Inc	ome Taxes Pai	d or Accrued	d (see instructio	ns)				
		Foreign Inc	come Taxes		For	reign Tax Credit S	Separate Cate	gories	
(a) (b) (c) (d) (e) (f) (g) (h) Ocossession (YYYY-MM-DD) Foreign Currency Conversion Rate U.S. Dollars Foreign Branch Passive General									(i) Other
Totals									

Form **8858** (Rev. 9-2021)

Tax Year 2023 1120 MeF ATS Scenario 3

(Rev. September 2021)

Department of the Treasury

Information Return of U.S. Persons With Respect to Foreign **Disregarded Entities (FDEs) and Foreign Branches (FBs)**

► Go to www.irs.gov/Form8858 for instructions and the latest information.

Information furnished for the FDE's or FB's annual accounting period (see instructions) 01/01 , 20 23 , and ending

OMB No. 1545-1910

Attachment Sequence No. 140

Internal Revenue Service	beginning	01/01	, 20 23 , 8	and ending	12/31 , 2	0 23	Sequence No. 140		
Name of person filing this return	n					Fil	ler's identifying number		
Anywork Finance Incorpo	rated				00-0000003				
Number, street, and room or su	ite no. (or P.O. box numbe	er if mail is n	ot delivered to stre	eet address)					
35 Any Street									
City or town, state, and ZIP coo	de								
Anytown, NY 10006									
Filer's tax year beginning			, 20	, and ending			, 20		
Important: Fill in all a	pplicable lines and	d schedu	les. All inforn	nation must be i	in English. All a	amounts	must be stated in		
U.S. dolla	rs unless otherwise	e indicate	ed.		-				
Check here FDE of a	U.S. person	FD	E of a controlled fo	oreign corporation (CFC	C) FI	DE of a cont	trolled foreign partnership		
✓ FB of a U.S. person □ FB of a CFC □ FB of a controlled foreign partnership									
Check here ✓ Initial For	rm 8858	Final Form	า 8858						
1a Name and address of FDE				b(1) U.S. identifyin	ng number, if any				
GHI International Finance					00-0	000018			
2000 Helmstraat Maastricht, Limburg/Neth	erlands 6211TA			b(2) Reference ID	number (see instruct	tions)			
c For FDE, country(ies) under	whose laws organized and	d entity type	under local tax la	W	d Date(s) of organ	ization e	Effective date as FDE		
Netherlands Foreign Entit	:y				12/30/2023	3	12/31/2023		
f If benefits under a U.S. tax income of the FDE or FB, e			g Country in white activity is cond	ch principal business	h Principal busine activity	ss il	Functional currency		
income of the fibe of fib, e	file the treaty and article i	iuiiibei	activity is conc	lucted	activity				
2 Provide the following inform				ove.					
a Name, address, and identify the United States	ying number of branch offi	ce or agent	(if any) in	b Name and address (including corporate department, if applicable) of person(s) with custody of the books and records of the FDE or FB, and the location of					
the office offices					records, if different	35 01 110 1 2	72 of 1 B, and the location of		
3 For the tax owner of the FD	DE or FB (if different from t	he filer), pro	vide the following (
a Name and address				b Annual accounti	ing period covered b	y the return	(see instructions)		
				c(1) U.S. identifyin	ng number, if any				
				c(2) Reference ID	number (see instruct	ions)			
				d Country under w	vhose laws organized	ı e	Functional currency		
4 For the direct owner of the	FDE or FB (if different from	m the tax ov	ner), provide the f		· · · · · · · · · · · · · · · · · · ·				
a Name and address				b Country under w	vhose laws organized	1			
				- 110 : 1 : 111			Frankland com		
				c U.S. identifying r	number, it any	d	Functional currency		
	1.01 1.11 1.00 10			1.1 1 1 10 10					

Cat. No. 21457L

Tax Year 2023 1120 MeF ATS Scenario 3

Form 8858 (Rev. 9-2021) Schedule C Income Statement (see instructions)

dollai section speci	ortant: Report all information in functional currency in accordance with U.S. GA rs translated from functional currency (using GAAP translation rules or the average 989(b)). If the functional currency is the U.S. dollar, complete only the U.S. ial rules for FDEs or FBs that use U.S. dollar approximate separate transactions are using the average exchange rate (determined under section 989(b)), check	age Doll meth	exchange rate de lars column. See hod of accountin	etermine instruc	ed under tions for M).
			Functional Currency	U.S. D	ollars
1	Gross receipts or sales (net of returns and allowances)	1	1,000,000		1,000,000
2	Cost of goods sold	2			
3	Gross profit (subtract line 2 from line 1)	3	800,000		800,000
4	Dividends	4	200,000		200,000
_		5			
5	Interest				
6	Gross rents, royalties, and license fees	6			
7	Gross income from performance of services	7	100,000		100,000
8	Foreign currency gain (loss)	8			
9	Other income	9			
10	Total income (add lines 3 through 9)	10	300,000		300,000
11	Total deductions (exclude income tax expense)	11	200,000		200,000
12	Income tax expense	12	20,000		20,000
13	Other adjustments	13			
14	Net income (loss) per books	14	80,000		80,000
Sch	edule C-1 Section 987 Gain or Loss Information				
	Note: See the instructions if there are multiple recipients of remittances from the FDE or FB.		(a) Amount stated in functional currency of FDE or FB	Amount functional	o) stated in currency of pient
1	Remittances from the FDE or FB	1			
2	Section 987 gain (loss) recognized by recipient	2			
3	Section 987 gain (loss) deferred under Regulations section 1.987-12 (attach	_			
Ü	statement)	3			
		0			
		3		Yes	No
4				Yes	No
4	Were all remittances from the FDE or FB treated as made to the direct owner?			Yes	No
4 5	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with re	espec	ct to remittances		No
	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the	espec	ct to remittances od used prior to		No
5	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	espec	ct to remittances od used prior to		No
5 Sch	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	espec meth	ot to remittances od used prior to	√	No ✓
5 Sch	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	espec meth	ct to remittances od used prior to	√	No
5 Sch	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	espec meth	ct to remittances od used prior to	ollars in	1
5 Sch	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	espec meth	ct to remittances od used prior to	ollars in	o)
Sch	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	esped meth trans use L	ct to remittances od used prior to	√ ollars in	o)
Sch mpc acco	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	especemeth	ct to remittances od used prior to	ollars in	o)
Sch mpc acco.	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	especemeth . transuse L	ct to remittances od used prior to	ollars in	o)
Sch mpc acco	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	especemeth	ct to remittances od used prior to	ollars in	o)
Sch mpc acco.	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	especemeth . transuse L	ct to remittances od used prior to	ollars in	o)
5 Sch	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	transuse L	ct to remittances od used prior to	ollars in	o)
5 Sch	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	especemeth	ct to remittances od used prior to	ollars in	o)
5 Sch	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	transuse L	ct to remittances od used prior to	ollars in	o)
5 Sch mpc 2 3 4 5 6	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	especemeth	ct to remittances od used prior to	ollars in	o)
5 Sch mpc 2 3 4 5 6	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	especemeth	ct to remittances od used prior to	ollars in	o)
5 Sch mpc 2 3 4 5 6	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	trans 1 2 3 4 5	ct to remittances od used prior to	ollars in	o)
5 Sch mpc 2 3 4 5 6	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	trans 1 2 3 4 5	ct to remittances od used prior to	Ollars in (I) End of accounting	o) annual ng period
5 Sch mpc acco 1 2 3 4 5 6 Sch	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	transe L 1 2 3	ct to remittances od used prior to	Ollars in (I) End of accounting	o) annual ng period
5 Sch mpc acco 1 2 3 4 5 6 Sch	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	especemeth	ct to remittances od used prior to	Ollars in (I) End of accounting	o) annual ng period
5 Sch mpc acco 1 2 3 4 5 6 Sch	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	trans use L 1 2 3 4 5 6	ct to remittances od used prior to	Ollars in (I) End of accounting	No
5 Sch mpc 3 3 4 5 6 Sch 1 2	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	especemeth trans use L 1 2 3 4 5 6	ct to remittances od used prior to	Ollars in (I) End of accounting	No
5 Sch mpc 3 3 4 5 6 Sch 1 2	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	especemeth 1 2 3 4 5 6	ct to remittances od used prior to	Ollars in (I) End of accounting	No
5 Sch mpc accoo. 1 2 3 4 5 6 Sch 1 2 3	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	trans trans 1 2 3 4 5 6	ct to remittances od used prior to	Ollars in (I) End of accounting	No
5 Sch mpc accoo. 1 2 3 4 5 6 Sch 1 2 3	Were all remittances from the FDE or FB treated as made to the direct owner? Did the tax owner change its method of accounting for section 987 gain or loss with refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	transe L 1 2 3 4 5 6 . irectly	ct to remittances od used prior to	Ollars in (I) End of accounting	No

Tax Year 2023 1120 MeF ATS Scenario 3

Sch	edule G	Other Information (continued)			
_				Yes	No
6	Is the FDE	or FB a qualified business unit as defined in section 989(a)?			✓
	Do not cor FBs and FL	nplete lines 7 and 8 if you are an individual who owns an FB or FDE directly or through tiers DEs.	s of		
7a	base erosic a foreign p	tax year, did the FDE or FB receive, or accrue the receipt of, any amounts defined a on payment under section 59A(d) or have a base erosion tax benefit under section 59A(c)(2) from the person, which is a related party of the taxpayer? See instructions. If "Yes," complete lines in the person in t	om		./
b c	Enter the to	otal amount of the base erosion tax benefit \$			•
8a b	erosion pay person, wh Enter the to	tax year, did the FDE or FB pay, or accrue the payment of, any amounts defined as a byment under section 59A(d) or have a base erosion tax benefit under section 59A(c)(2) to a foreich is a related party of the taxpayer? See instructions. If "Yes," complete lines 8b and 8c otal amount of the base erosion payments	eign		√
9	Answer on	otal amount of the base erosion tax benefit \$	FB		
	Answer the U.S. corpo	e remaining questions in Schedule G only if the tax owner of the FB or the interest in the FDE ration. Answer questions 10a through 11c if the tax owner of the FB or the interest in the FDI a U.S. corporation solely for purposes of these questions.	is a		
10a	part of a co	the interest in the FDE is a separate unit under Regulations section 1.1503(d)-1(b)(4), and is ombined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii), does the separate unit his solidated loss as defined in Regulations section 1.1503(d)-1(b)(5)(ii)?	ave		√
		nter the amount of the dual consolidated loss	-' ⊢		
11a	Regulation defined in I	or the interest in the FDE is a separate unit and part of a combined separate unit uns section 1.1503(d)-1(b)(4)(ii), does the combined separate unit have a dual consolidated loss Regulations section 1.1503(d)-1(b)(5)(ii)? If "Yes," complete lines 11b and 11c	as		✓
b		mount of the dual consolidated loss for the combined separate unit > \$ (_)		
С	under Regi	et income (loss) attributed to the individual FB or the individual interest in the FDE as determinulations section 1.1503(d)-5(c)(4)(ii)(A)			
12a		ortion of the dual consolidated loss on line 10b or 11b taken into account in computing Lorent the year? If "Yes," go to line 12b. If "No," go to line 13			✓
b		permitted domestic use of the dual consolidated loss under Regulations section 1.1503(d)-6 the instructions and go to line 12c. If "No," go to line 12d			
С		the documentation that is required for the permitted domestic use under Regulations sector attached to the return? After answering this question, go to line 13a			
d		not a permitted domestic use, was the dual consolidated loss used to compute consolidated ome as provided under Regulations section 1.1503(d)-4? If "Yes," go to line 12e			
е		e separate unit's contribution to the cumulative consolidated taxable inco re register") as of the beginning of the tax year > \$ See instructions.			
13a	recapture of	tax year, did any triggering event(s) occur under Regulations section 1.1503(d)-6(e) required from the following any dual consolidated loss(es) attributable to the FB or interest in the FDE, individually or ombined separate unit, in any prior tax years?	as		√
b		iter the total amount of recapture ▶\$. See instructions.			
	edule H				
mpo		er the amounts on lines 1 through 6 in functional currency.			
1	•	ar net income (loss) per foreign books of account	1		80,000
2		dditions	2		
3		ubtractions	3		
4		rnings and profits (or taxable income—see instructions) (line 1 plus line 2 minus line 3)	4		
5	•	in (loss) (if applicable)	5 6		
6 7		rnings and profits (or taxable income) in U.S. dollars (line 6 translated at the average	0		
7	exchange i	rate determined under section 989(b) and the related regulations (see instructions))	7		80,000
8	⊏iitei exch	anyo rato usou ioi iiito /			

Tax Year 2023 1120 MeF ATS Scenario 3

Form 8858 (Rev. 9-2021)

Sched	dule i Ira	ansterred Loss	Amount (see	instructions)						
Importa	ant: See instru	uctions for who i	has to comple	ete this section.						
			-					Yes	No	
	Were any assets of an FB (including an FB that is an FDE) transferred to a foreign corporation? If "No," stop here. If "Yes," go to line 2									
а	n FB that is ar	ror a domestic con n FDE) to a speci 	fied 10%-own	ed foreign corpor	ation? If "No,"	stop here. If "	rès," go to			
		er the transfer, v on corporation? If								
		ferred loss amou		•	•					
Sched	lule J Inc	ome Taxes Pai	d or Accrued	d (see instruction	ns)					
		Foreign Inc	ome Taxes		For	reign Tax Credit	Separate Categ	ories		
(a) Country or Possession		(c) Foreign Currency	(d) Conversion Rate	(e) U.S. Dollars	(f) Foreign Branch	(g) Passive	(h) General	((i) Other	
NL					20,000					
Totals										

Form **8858** (Rev. 9-2021)

1120 MeF ATS Scenario 3

U.S. Shareholder Calculation of Global Intangible Low-Taxed Income (GILTI)

Tax Year 2023

(Rev. December 2022) Department of the Treasury Internal Revenue Service

Name of person filing this return

Go to www.irs.gov/Form8992 for instructions and the latest information.

OMB No. 1545-0123

Attachment

A Identifying number

Sequence No. 992

Part Net Controlled Foreign Corporation (CFC) Tested Income 1 Sum of Pro Rata Share of Net Tested Income 1 ft the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (e). 1	Anyw	ork Finance Incorporated	00-0	000003
If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part III, column (c), that pertains to the U.S. shareholder. Sum of Pro Rata Share of Net Tested Loss If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule B (Form 8992), line 1, column (f). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), part II, column (f), that pertains to the U.S. shareholder. Net CFC Tested Income. Combine lines 1 and 2. If zero or less, stop here Calculation of Global Intangible Low-Taxed Income (GILTI) Net CFC Tested Income. Enter amount from Part I, line 3 Deemed Tangible Income Return (DTIR) If the U.S. shareholder is not a member of a U.S. consolidated group, multiply the total from Schedule A (Form 8992), line 1, column (g), by 10% (0.10). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), line 1, column (g), that pertains to the U.S. shareholder. Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule B (Form 8992), line 1, column (g). Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is not a member of a U.S. cons	Name o	f U.S. shareholder	B Identifying numb	per
If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part III, column (c), that pertains to the U.S. shareholder. Sum of Pro Rata Share of Net Tested Loss If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule B (Form 8992), line 1, column (f). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), part II, column (f), that pertains to the U.S. shareholder. Net CFC Tested Income. Combine lines 1 and 2. If zero or less, stop here Calculation of Global Intangible Low-Taxed Income (GILTI) Net CFC Tested Income. Enter amount from Part I, line 3 Deemed Tangible Income Return (DTIR) If the U.S. shareholder is not a member of a U.S. consolidated group, multiply the total from Schedule A (Form 8992), line 1, column (g), by 10% (0.10). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), line 1, column (g), that pertains to the U.S. shareholder. Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule B (Form 8992), line 1, column (g). Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is not a member of a U.S. cons	Part	Net Controlled Foreign Corporation (CFC) Tested Income		_
If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (e). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (c), that pertains to the U.S. shareholder. 2 Sum of Pro Rata Share of Net Tested Loss If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (f). If the U.S. shareholder is not a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (f), that pertains to the U.S. shareholder. 3 Net CFC Tested Income. Combine lines 1 and 2. If zero or less, stop here 3 800,000 Part III Calculation of Global Intangible Low-Taxed Income (GILTI) 1 Net CFC Tested Income. Enter amount from Part I, line 3 2 Deemed Tangible Income Return (DTIR) If the U.S. shareholder is not a member of a U.S. consolidated group, multiply the total from Schedule B (Form 8992), Part II, column (g), by 10% (0.10). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (g), that pertains to the U.S. shareholder. 3 Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is an ember of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is not a member of a U.S. consolidated group, leave line 3b blank. C Specified Interest Expense If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (g), that pertains to the U.S. shareholder. A Net DTIR. Subtract line 3c from line 2. If ze				
from Schedule B (Form 8992), Part II, column (c), that pertains to the U.S. shareholder. Sum of Pro Rata Share of Net Tested Loss If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule B (Form 8992), line 1, column (f). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (f), that pertains to the U.S. shareholder. Net CFC Tested Income. Combine lines 1 and 2. If zero or less, stop here Calculation of Global Intangible Low-Taxed Income (GILTI) Net CFC Tested Income. Enter amount from Part I, line 3 Deemed Tangible Income Return (DTIR) If the U.S. shareholder is not a member of a U.S. consolidated group, multiply the total from Schedule A (Form 8992), line 1, column (g), by 10% (0.10). Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (i), that pertains to the U.S. shareholder. Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (j). If the U.S. shareholder is a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (j). If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (ii). If the U.S. shareholder is a member of a U.S. consolidated group, subtract line 3b blank. C Specified Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (iii), that pertains to the U.S. shareholder. A Net DTIR, Subtract line 3c from line 2. If zero or less, enter -0 5 GILTI. Subtract line 4 from line 1. If zero or less, enter -0 5 Toologo	·	If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (e).	<u>1</u>	800,000
If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (f). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (f), that pertains to the U.S. shareholder. Net CFC Tested Income. Combine lines 1 and 2. If zero or less, stop here Net CFC Tested Income. Enter amount from Part I, line 3 Deemed Tangible Income Return (DTIR) If the U.S. shareholder is not a member of a U.S. consolidated group, multiply the total from Schedule A (Form 8992), Jine 1, column (g), by 10% (0.10). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (g), that pertains to the U.S. shareholder. 3a Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is not a member of a U.S. consolidated group, leave line 3a blank. b Sum of Pro Rata Share of Tested Interest Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (g). If the U.S. shareholder is a member of a U.S. consolidated group, elave line 3b blank. c Specified Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0 If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder. 4 100.000 5 GILTI. Subtract line 3c from line 2. If zero or less, enter -0 5 700.000	2	from Schedule B (Form 8992), Part II, column (c), that pertains to the U.S. shareholder.		
from Schedule B (Form 8992), Part II, column (f), that pertains to the U.S. shareholder. Net CFC Tested Income. Combine lines 1 and 2. If zero or less, stop here. 3 800,000 Part II Calculation of Global Intangible Low-Taxed Income (GILTI) Net CFC Tested Income. Enter amount from Part I, line 3	_	If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total	2	()
Part II Calculation of Global Intangible Low-Taxed Income (GILTI) 1 Net CFC Tested Income. Enter amount from Part I, line 3	3	from Schedule B (Form 8992), Part II, column (f), that pertains to the U.S. shareholder.	3	800,000
1 Net CFC Tested Income. Enter amount from Part I, line 3	_	· · · · · · · · · · · · · · · · · · ·	3	000,000
Deemed Tangible Income Return (DTIR) If the U.S. shareholder is not a member of a U.S. consolidated group, multiply the total from Schedule A (Form 8992), line 1, column (g), by 10% (0.10). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (i), that pertains to the U.S. shareholder. Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (i). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3a blank. b Sum of Pro Rata Share of Tested Interest Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (i). If the U.S. shareholder is a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (i). If the U.S. shareholder is a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0- If the U.S. shareholder is not a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder. 4 Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0- 5 700,000		-	1	800.000
If the U.S. shareholder is not a member of a U.S. consolidated group, multiply the total from Schedule A (Form 8992), line 1, column (g), by 10% (0.10). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (i), that pertains to the U.S. shareholder. 3a Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (j). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3a blank. b Sum of Pro Rata Share of Tested Interest Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (i). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3b blank. c Specified Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0 If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder. 4 Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0 5 700,000				000,000
from Schedule B (Form 8992), Part II, column (i), that pertains to the U.S. shareholder. 3a Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (j). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3a blank. b Sum of Pro Rata Share of Tested Interest Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (j). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3b blank. c Specified Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0- If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder. 4 Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0- 5 700,000		If the U.S. shareholder is not a member of a U.S. consolidated group, multiply the	2	100,000
group, enter the total from Schedule A (Form 8992), line 1, column (j). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3a blank. b Sum of Pro Rata Share of Tested Interest Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (i). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3b blank. c Specified Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0 If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder. 4 Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0	3a	from Schedule B (Form 8992), Part II, column (i), that pertains to the U.S. shareholder.		
group, leave line 3a blank. b Sum of Pro Rata Share of Tested Interest Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (i). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3b blank. c Specified Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0 If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder. 4 Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0		group, enter the total from Schedule A (Form 8992), line 1,		
If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (i). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3b blank. c Specified Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0 If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder. 4 Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0	h	group, leave line 3a blank.		
group, enter the total from Schedule A (Form 8992), line 1, column (i). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3b blank. c Specified Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0 If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder. 4 Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0	D			
group, leave line 3b blank. c Specified Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0 If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder. 4 Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0		group, enter the total from Schedule A (Form 8992), line 1,		
If the U.S. shareholder is not a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0 If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder. Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0				
3b from line 3a. If zero or less, enter -0 If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder. 4 Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0	С	·		
from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder. 4 Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0		3b from line 3a. If zero or less, enter -0	30	: 0
5 GILTI. Subtract line 4 from line 1. If zero or less, enter -0		from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder.		

Tax Year 2023

1120 MeF ATS Scenario 3

Schedule of Controlled Foreign Corporation (CFC) Information To Compute **Global Intangible Low-Taxed Income (GILTI)**

Department of the Treasury Go to www.irs.gov/Form 8992 for instructions and the latest information. Internal Revenue Service

OMB No. 1545-0123

Attachment

00-0000003

A Identifying number

Sequence No. 992A

Name of U.S. shareholde	er							B Identif	ying number			
		Calculations for Net Tested Income (see instructions)								Tested I	GILTI Allocated to Tested Income CFCs (see instructions)	
(a) Name of CFC	(b) EIN or Reference ID	(c) Tested Income	(d) Tested Loss	(e) Pro Rata Share of Tested Income	(f) Pro Rata Share of Tested Loss	(g) Pro Rata Share of Qualified Business Asset Investment (QBAI)	(h) Pro Rata Share of Tested Loss QBAI Amount	(i) Pro Rata Share of Tested Interest Income	(j) Pro Rata Share of Tested Interest Expense	(k) GILTI Allocation Ratio (Divide Col. (e) by Col. (e), Line 1 Total)	(I) GILTI Allocated to Tested Income CFCs (Multiply Form 8992, Part II, Line 5, by Col. (k))	
NL		800,000		800,000	(1,000,000	(1.0000	700,000	
		200,000	()		()	1,000,000	()					
			()		()		()					
			(()		()					
			()		()		()					
			())	()		()					
			()		()		()					
			()		()		()					
			()		()		()					
			(()		()					
1. Totals (see instru Totals on line 1 sh	<u> </u>	800,000	,	800,000	()	1,000,000	()			1.0000	700,000	

October 05, 2023

SCHEDULE A

(Rev. December 2022)

Name of person filing this schedule

Anywork Finance Incorporated

(Form 8992)

Tax Year 2023 1120 MeF ATS Scenario 3

Scriedule A (Form 8992											Page	
Schedule A-Co	ontinuation	Sheet. Use	only if you need	additional spa	ace.							
Name of person filing th								A Identi	fying number			
Anywork Finance I	ncorporated								00-00	000003		
Name of U.S. sharehold	der							B Identi	fying number			
Calculations for Net Tested Income									GILTI Allocated to			
				Jul	(see instru					Tested (see i	Tested Income CFCs (see instructions)	
(a) Name of CFC	(b) EIN or Reference ID	(c) Tested Income	(d) Tested Loss	(e) Pro Rata Share of Tested Income	(f) Pro Rata Share of Tested Loss	(g) Pro Rata Share of Qualified Business Asset Investment (QBAI)	(h) Pro Rata Share of Tested Loss QBAI Amount	(i) Pro Rata Share of Tested Interest Income	of	(k) GILTI Allocation Ratio (Divide Col. (e) by Col. (e), Line 1 Total)	(I) GILTI Allocated to Tested Income CFCs (Multiply Form 8992, Part II, Line 5, by Col. (k))	
)	())				
)	())				
			()	()	()				
			()	()						
)	())				
)	())				
)	())				
)	()		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \				
))						
))		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \				
1. Totals (see instr	ructions))	())				

Tax Year 2023 1120 MeF ATS Scenario 3

Form **8993**(Rev. December 2021)
Department of the Treasury

Internal Revenue Service

Name of person filing this return

Section 250 Deduction for Foreign-Derived Intangible Income (FDII) and Global Intangible Low-Taxed Income (GILTI)

▶ Go to www.irs.gov/Form8993 for instructions and the latest information.

OMB No. 1545-0123

Identifying number

Attachment Sequence No. **993**

Anywork Finance Incorporated 00-000003 Part I Determining Deduction Eligible Income (DEI) and Deemed Intangible Income (DII) (see instructions) 1 Gross income 2 **Exclusions** Income included under section 951(a)(1) (see instructions) . . . Income included under section 951A (see instructions) . . . 2b b Financial services income C 2c d CFC dividends (see instructions) 2d Domestic oil and gas extraction income 2e е Foreign branch income f Total exclusions (add lines 2a through 2f) 3 3 4 Gross DEI (subtract line 3 from line 1) 4 5 Deductions properly allocable to the amount on line 4 . . . 5 6 DEI (subtract line 5 from line 4) 6 Deemed tangible income return (DTIR) (10% of QBAI) . . . 7a DTIR (10% of QBAI) from partnerships Total DTIR (add lines 7a and 7b) 7c DII (subtract line 7c from line 6) 8 Part II **Determining Foreign-Derived Deduction Eligible Income (FDDEI)** (see instructions) (A) Foreign-derived (B) Foreign-derived (C) Foreign-derived (D) Total (add columns income from all sales income from all sales income from all (A) through (C)) of general property of intangible property services Gross receipts 9a h Gross receipts from partnerships 9b Total gross receipts (add lines 9a and 9b) . 9c Cost of goods sold (COGS) (see instructions) . 10a 10a COGS from partnerships (see instructions) . . 10b Total COGS (add lines 10a and 10b) . . . 10c 11 Gross FDDEI (subtract line 10c from line 9c) 11 12 Allocable deductions 12 13 Allocable deductions from partnerships . . . 13 14 Interest deductions 14 Research and experimental deductions 15 15 16 16 17 Other apportioned deductions from partnerships 17 18 Total deductions (add lines 12 through 17) 18 19 FDDEI (subtract line 18 from line 11) 19 Part III **Determining FDII and/or GILTI Deduction** (see instructions) 20 Foreign-derived ratio (FDDEI/DEI) (divide line 19 by line 6) 20 21 21 22 22 700.000 700,000 23 23 24 Taxable income (see instructions) (If zero or less, skip lines 25 through 27 and enter -0- on lines 28 24 1.054.613 25 Excess FDII and GILTI over taxable income (subtract line 24 from line 23). If zero or less, enter -0-25 0 26 FDII reduction (divide line 21 by line 23; multiply by line 25) 26 27 27 28 FDII deduction (see instructions). Enter here and on Form 1120, Schedule C 28 29 GILTI deduction (see instructions). Enter here and on Form 1120, Schedule C . 437.500