Anywork Finance Incorporated 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), Sch J (F5471)(3), Sch I-1 (F5471), Sch M (F5471), Sch O (F5471), 5472, 8832, 8858(2), 8992, 8993

ATTACHMENTS:
ItemizedOtherDeductionsSchedule
ItemizedOtherCurrentAssetsSchedule
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: 02/15/2021
Preparer Name: Johnny Appleseed

Date Prepared: 02/15/2021
IRS PAYMENT: N/A
Prior Year Income Amt: $417,113
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 Corporation	APPLD FOR	41,193,236	76,436,862	6,395,936	0

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*

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

Tax Year 2020
1120 MeF ATS Scenario 3

November 22, 2020

Form **1120**
Department of the Treasury
Internal Revenue Service

U.S. Corporation Income Tax Return

For calendar year 2020 or tax year beginning January 01, 2020, ending December 31, 20 20

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

OMB No. 1545-0123

2020

A Check if:
1a Consolidated return (attach Form 851) ☐
b Life/nonlife consolidated return ☐
2 Personal holding co. (attach Sch. PH) ☐
3 Personal service corp. (see instructions) ☐
4 Schedule M-3 attached ☑

TYPE OR PRINT

Name: Anywork Finance Incorporated

Number, street, and room or suite no. If a P.O. box, see instructions.: 35 Any Street

City or town, state or province, country, and ZIP or foreign postal code: Anytown, NY 10006

B Employer identification number: 00-0000003

C Date incorporated: 08-01-1985

D Total assets (see instructions): $ 250,306,361

E Check if: (1) ☐ Initial return (2) ☐ Final return (3) ☐ Name change (4) ☐ Address change

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Income	1a	Gross receipts or sales	1a	1,000,000	
	b	Returns and allowances	1b		
	c	Balance. Subtract line 1b from line 1a			1c 1,000,000
	2	Cost of goods sold (attach Form 1125-A)			2
	3	Gross profit. Subtract line 2 from line 1c			3 1,000,000
	4	Dividends and inclusions (Schedule C, line 23)			4 44,743,620
	5	Interest			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
Deductions (See instructions for limitations on deductions.)	12	Compensation of officers (see instructions—attach Form 1125-E) ▶			12
	13	Salaries and wages (less employment credits)			13 200,000
	14	Repairs and maintenance			14
	15	Bad debts			15
	16	Rents			16
	17	Taxes and licenses			17
	18	Interest (see instructions)			18
	19	Charitable contributions			19
	20	Depreciation from Form 4562 not claimed on Form 1125-A or elsewhere on return (attach Form 4562)			20
	21	Depletion			21
	22	Advertising			22
	23	Pension, profit-sharing, etc., plans			23
	24	Employee benefit programs			24
	25	Reserved for future use			25
	26	Other deductions (attach statement)			26 120,387
	27	**Total deductions.** Add lines 12 through 26 ▶			27 320,387
	28	Taxable income before net operating loss deduction and special deductions. Subtract line 27 from line 11			28 45,523,233
	29a	Net operating loss deduction (see instructions)	29a		
	b	Special deductions (Schedule C, line 24)	29b	44,106,120	
	c	Add lines 29a and 29b			29c 44,106,120
Tax, Refundable Credits, and Payments	30	**Taxable income.** Subtract line 29c from line 28. See instructions			30 1,417,113
	31	Total tax (Schedule J, Part I, line 11)			31 168,000
	32	2020 net 965 tax liability paid (Schedule J, Part II, line 12)			32
	33	Total payments, credits, and section 965 net tax liability (Schedule J, Part III, line 23)			33 16,678,103
	34	Estimated tax penalty. See instructions. Check if Form 2220 is attached ▶ ☐			34
	35	**Amount owed.** If line 33 is smaller than the total of lines 31, 32, and 34, enter amount owed			35
	36	**Overpayment.** If line 33 is larger than the total of lines 31, 32, and 34, enter amount overpaid			36 16,510,103
	37	Enter amount from line 36 you want: **Credited to 2021 estimated tax** ▶ **Refunded** ▶			37 16,510,103

Sign Here

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.

▶ Signature of officer | Date ▶ Chief Executive Officer Title

May the IRS discuss this return with the preparer shown below? See instructions. ☑ Yes ☐ No

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
				P00000002

Firm's name ▶ Electronic Tax Filers, Inc. Firm's EIN ▶ 00-0000011

Firm's address ▶ 100 Efile Drive, Anytown, NY 10006 Phone no. 512-555-1212

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 11450Q Form **1120** (2020)

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Schedule C Dividends, Inclusions, and Special Deductions (see instructions)

		(a) Dividends and inclusions	(b) %	(c) Special deductions (a) × (b)
1	Dividends from less-than-20%-owned domestic corporations (other than debt-financed stock)		50	
2	Dividends from 20%-or-more-owned domestic corporations (other than debt-financed stock)		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 company operating under the Small Business Investment Act of 1958		100	
11	Dividends from affiliated group members		100	
12	Dividends from certain FSCs		100	
13	Foreign-source portion of dividends received from a specified 10%-owned foreign corporation (excluding hybrid dividends) (see instructions)		100	
14	Dividends from foreign corporations not included on line 3, 6, 7, 8, 11, 12, or 13 (including any hybrid dividends)			
15	Section 965(a) inclusion		See instructions	
16a	Subpart F inclusions derived from the sale by a controlled foreign corporation (CFC) of the stock of a lower-tier foreign corporation treated as a dividend (attach Form(s) 5471) (see instructions)	43,668,620	100	43,668,620
b	Subpart F inclusions derived from hybrid dividends of tiered corporations (attach Form(s) 5471) (see instructions)			
c	Other inclusions from CFCs under subpart F not included on line 15, 16a, 16b, or 17 (attach Form(s) 5471) (see instructions)	160,000		
17	Global Intangible 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 and former DISC dividends not included on line 1, 2, or 3			
20	Other dividends			
21	Deduction for dividends paid on certain preferred stock of public utilities			
22	Section 250 deduction (attach Form 8993)			437,500
23	**Total dividends and inclusions.** Add column (a), lines 9 through 20. Enter here and on page 1, line 4	44,743,620		
24	**Total special deductions.** Add column (c), lines 9 through 22. Enter here and on page 1, line 29b			44,106,120

Schedule J Tax Computation and Payment (see instructions)

Part I—Tax Computation

1	Check if the corporation is a member of a controlled group (attach Schedule O (Form 1120)). See instructions ▶ ☐				
2	Income tax. See instructions			2	297,594
3	Base erosion minimum tax amount (attach Form 8991)			3	
4	Add lines 2 and 3			4	297,594
5a	Foreign tax credit (attach Form 1118)	5a	129,594		
b	Credit from Form 8834 (see instructions)	5b			
c	General business credit (attach Form 3800)	5c			
d	Credit for prior year minimum tax (attach Form 8827)	5d			
e	Bond credits from Form 8912	5e			
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)	9a			
b	Recapture of low-income housing credit (attach Form 8611)	9b			
c	Interest due under the look-back method—completed long-term contracts (attach Form 8697)	9c			
d	Interest due under the look-back method—income forecast method (attach Form 8866)	9d			
e	Alternative tax on qualifying shipping activities (attach Form 8902)	9e			
f	Interest/tax due under Section 453A(c) and/or Section 453(l)	9f			
g	Other (see instructions—attach statement)	9g			
10	**Total.** Add lines 9a through 9g			10	
11	**Total tax.** Add lines 7, 8, and 10. Enter here and on page 1, line 31			11	168,000

Part II—Section 965 Payments (see instructions)

12	2020 net 965 tax liability paid from Form 965-B, Part II, column (k), line 4. Enter here and on page 1, line 32	12	0

Part III—Payments, Refundable Credits, and Section 965 Net Tax Liability

13	2019 overpayment credited to 2020			13	1,678,103
14	2020 estimated tax payments			14	15,000,000
15	2020 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:				
a	Form 2439	20a			
b	Form 4136	20b			
c	Reserved for future use	20c			
d	Other (attach statement—see instructions)	20d			
21	**Total credits.** Add lines 20a through 20d			21	0
22	2020 net 965 tax liability from Form 965-B, Part I, column (d), line 4. See instructions			22	
23	**Total payments, credits, and section 965 net tax liability.** Add lines 19, 21, and 22. Enter here and on page 1, line 33			23	16,678,103

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Schedule K Other Information (see instructions)

		Yes	No
1	Check accounting method: a ☐ Cash b ☑ Accrual c ☐ Other (specify) ▶		
2	See the instructions and enter the:		
a	Business activity code no. ▶ 522293		
b	Business activity ▶ International Finance		
c	Product or service ▶ International Finance		
3	Is the corporation a subsidiary in an affiliated group or a parent–subsidiary controlled group?	✓	
	If "Yes," enter name and EIN of the parent corporation ▶ ABC Finance (ABCF) 00-0000021		
4	At the end of the tax year:		
a	Did any foreign or domestic corporation, partnership (including any entity treated as a partnership), trust, or tax-exempt 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	Did any individual or estate 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 II of Schedule G (Form 1120) (attach Schedule G)		✓
5	At the end of the tax year, did the corporation:		
a	Own directly 20% or more, or own, directly or indirectly, 50% or more of the total voting power of all classes of stock entitled to vote of any foreign or domestic corporation not included on **Form 851,** Affiliations Schedule? For rules of constructive ownership, see instructions. If "Yes," complete (i) through (iv) below.	✓	

(i) Name of Corporation	(ii) Employer Identification Number (if any)	(iii) Country of Incorporation	(iv) Percentage Owned in Voting Stock
Foreign Finance Corporation		UK	100 %
Foreign Sands		NL	100%

b	Own directly an interest of 20% or more, or own, directly or indirectly, an interest of 50% or more in any foreign or domestic partnership (including an entity treated as a partnership) or in the beneficial interest of a trust? For rules of constructive ownership, see instructions. If "Yes," complete (i) through (iv) below.		

(i) Name of Entity	(ii) Employer Identification Number (if any)	(iii) Country of Organization	(iv) Maximum Percentage Owned in Profit, Loss, or Capital

6	During this tax year, did the corporation pay dividends (other than stock dividends and distributions in exchange for stock) in excess of the corporation's current and accumulated earnings and profits? See sections 301 and 316		✓
	If "Yes," file **Form 5452,** Corporate Report of Nondividend Distributions. See the instructions for Form 5452. If this is a consolidated return, answer here for the parent corporation and on Form 851 for each subsidiary.		
7	At any time during the tax year, did one foreign person own, directly or indirectly, at least 25% of the total voting power of all classes of the corporation's stock entitled to vote or at least 25% of the total value of all classes of the corporation's stock?	✓	
	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 of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business. Enter the number of Forms 5472 attached ▶ 1		
8	Check this box if the corporation issued publicly offered debt instruments with original issue discount ▶ ☐ If checked, the corporation may have to file **Form 8281,** Information Return for Publicly Offered Original Issue Discount Instruments.		
9	Enter the amount of tax-exempt interest received or accrued during the tax year ▶ $		
10	Enter the number of shareholders at the end of the tax year (if 100 or fewer) ▶		
11	If the corporation has an NOL for the tax year and is electing to forego the carryback period, check here (see instructions) ▶ ☐ If the corporation is filing a consolidated return, the statement required by Regulations section 1.1502-21(b)(3) must be attached or the election will not be valid.		
12	Enter the available NOL carryover from prior tax years (do not reduce it by any deduction reported on page 1, line 29a.) ▶ $		

Schedule K **Other Information** *(continued from page 4)*

		Yes	No
13	Are the corporation'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 tax year less than $250,000?		✓
	If "Yes," the corporation is not required to complete Schedules L, M-1, and M-2. Instead, enter the total amount of cash distributions and the book value of property distributions (other than cash) made during the tax year ► $		
14	Is the corporation required to file Schedule UTP (Form 1120), Uncertain Tax Position Statement? See instructions		✓
	If "Yes," complete and attach Schedule UTP.		
15a	Did the corporation make any payments in 2020 that would require it to file Form(s) 1099?		✓
b	If "Yes," did or will the corporation file required Form(s) 1099?		
16	During this tax year, did the corporation have an 80%-or-more change in ownership, including a change due to redemption of its own stock?		✓
17	During or subsequent to this tax year, but before the filing of this return, did the corporation dispose of more than 65% (by value) of its assets in a taxable, non-taxable, or tax deferred transaction?		✓
18	Did the corporation receive assets in a section 351 transfer in which any of the transferred assets had a fair market basis or fair market value of more than $1 million?		✓
19	During the corporation's tax year, did the corporation make any payments that would require it to file Forms 1042 and 1042-S under chapter 3 (sections 1441 through 1464) or chapter 4 (sections 1471 through 1474) of the Code?		✓
20	Is the corporation operating on a cooperative basis?		✓
21	During the tax year, did the corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions		✓
	If "Yes," enter the total amount of the disallowed deductions ► $		
22	Does the corporation have gross receipts of at least $500 million in any of the 3 preceding tax years? (See sections 59A(e)(2) and (3))		✓
	If "Yes," complete and attach Form 8991.		
23	Did the corporation have an election under section 163(j) for any real property trade or business or any farming business in effect during the tax year? See instructions		✓
24	Does the corporation satisfy one or more of the following? See instructions		✓
a	The corporation owns a pass-through entity with current, or prior year carryover, excess business interest expense.		
b	The corporation's aggregate average annual gross receipts (determined under section 448(c)) for the 3 tax years preceding the current tax year are more than $26 million and the corporation has business interest expense.		
c	The corporation is a tax shelter and the corporation has business interest expense.		
	If "Yes," complete and attach Form 8990.		
25	Is the corporation attaching Form 8996 to certify as a Qualified Opportunity Fund?		✓
	If "Yes," enter amount from Form 8996, line 15 ► $		
26	Since December 22, 2017, did a foreign corporation directly or indirectly acquire substantially all of the properties held directly or indirectly by the corporation, and was the ownership percentage (by vote or value) for purposes of section 7874 greater than 50% (for example, the shareholders held more than 50% of the stock of the foreign corporation)? If "Yes," list the ownership percentage by vote and by value. See instructions		
	Percentage: By Vote By Value		

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Schedule L Balance Sheets per Books

		Beginning of tax year		End of tax 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		139,488,245		250,306,361
	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

Schedule M-1 Reconciliation of Income (Loss) per Books With Income per Return

Note: The corporation may be required to file Schedule M-3. See instructions.

1	Net income (loss) per books		7	Income recorded on books this year not included on this return (itemize): Tax-exempt interest $	
2	Federal income tax per books				
3	Excess of capital losses over capital gains				
4	Income subject to tax not recorded on books this year (itemize):		8	Deductions on this return not charged against book income this year (itemize):	
5	Expenses recorded on books this year not deducted on this return (itemize):		a	Depreciation $	
a	Depreciation $		b	Charitable contributions $	
b	Charitable contributions $				
c	Travel and entertainment $		9	Add lines 7 and 8	
6	Add lines 1 through 5		10	Income (page 1, line 28)—line 6 less line 9	

Schedule M-2 Analysis of Unappropriated Retained Earnings per Books (Schedule L, Line 25)

1	Balance at beginning of year	251,623	5	Distributions: a Cash	
2	Net income (loss) per books	135,879		b Stock	
3	Other increases (itemize):			c Property	
			6	Other decreases (itemize):	
			7	Add lines 5 and 6	
4	Add lines 1, 2, and 3	387,502	8	Balance at end of year (line 4 less line 7)	387,502

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SCHEDULE G (Form 1120)
(Rev. December 2011)
Department of the Treasury
Internal Revenue Service

Information on Certain Persons Owning the Corporation's Voting Stock

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

OMB No. 1545-0123

Name	Employer identification number (EIN)
Anywork Finance Incorporated	00-0000003

Part I **Certain Entities Owning the Corporation's Voting Stock.** (Form 1120, Schedule K, Question 4a). Complete columns (i) through (v) below for any foreign or domestic corporation, partnership (including any entity treated as a partnership), trust, or tax-exempt organization that owns directly 20% or more, or owns, directly or indirectly, 50% or more of the total voting power of all classes of the corporation's stock entitled to vote (see instructions).

(i) Name of Entity	(ii) Employer Identification Number (if any)	(iii) Type of Entity	(iv) Country of Organization	(v) Percentage Owned in Voting Stock
ABC Finance	00-0000021	Corporation	UK	100%

Part II **Certain Individuals and Estates Owning the Corporation's Voting Stock.** (Form 1120, Schedule K, Question 4b). Complete columns (i) through (iv) below for any individual or estate that owns directly 20% or more, or owns, directly or indirectly, 50% or more of the total voting power of all classes of the corporation's stock entitled to vote (see instructions).

(i) Name of Individual or Estate	(ii) Identifying Number (if any)	(iii) Country of Citizenship (see instructions)	(iv) Percentage Owned in Voting Stock

For Paperwork Reduction Act Notice, see the Instructions for Form 1120.

Cat. No. 52684S

Schedule G (Form 1120) (Rev. 12-2011)

Tax Year 2020
November 22, 2020 1120 MeF ATS Scenario 3

SCHEDULE M-3 (Form 1120)
(Rev. December 2019)
Department of the Treasury
Internal Revenue Service

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

▶ Attach to Form 1120 or 1120-C.
▶ Go to *www.irs.gov/Form1120* for instructions and the latest information.

OMB No. 1545-0123

Name of corporation (common parent, if consolidated return): Anywork Finance Incorporated

Employer identification number: 00-0000003

Check applicable box(es): (1) ☑ Non-consolidated return (2) ☐ Consolidated return (Form 1120 only)
(3) ☐ Mixed 1120/L/PC group (4) ☐ Dormant subsidiaries schedule attached

Part I Financial Information and Net Income (Loss) Reconciliation (see instructions)

1a Did the corporation file SEC Form 10-K for its income statement period ending with or within this tax year?
☐ **Yes.** Skip lines 1b and 1c and complete lines 2a through 11 with respect to that SEC Form 10-K.
☑ **No.** Go to line 1b. See instructions if multiple non-tax-basis income statements are prepared.

b Did the corporation prepare a certified audited non-tax-basis income statement for that period?
☑ **Yes.** Skip line 1c and complete lines 2a through 11 with respect to that income statement.
☐ **No.** Go to line 1c.

c Did the corporation prepare a non-tax-basis income statement for that period?
☐ **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.

2a Enter the income statement period: Beginning MM/DD/YYYY Ending MM/DD/YYYY

b Has the corporation's income statement been restated for the income statement period on line 2a?
☐ **Yes.** (If "Yes," attach an explanation and the amount of each item restated.)
☑ **No.**

c Has the corporation's income statement been restated for any of the five income statement periods immediately preceding the period on line 2a?
☐ **Yes.** (If "Yes," attach an explanation and the amount of each item restated.)
☑ **No.**

3a Is any of the corporation's voting common stock publicly traded?
☐ **Yes.**
☑ **No.** If "No," go to line 4a.

b Enter the symbol of the corporation's primary U.S. publicly traded voting common stock . . . . . ☐☐☐☐☐

c Enter the nine-digit CUSIP number of the corporation's primary publicly traded voting common stock . . . . . ☐☐☐☐☐☐☐☐☐

4a	Worldwide consolidated net income (loss) from income statement source identified in Part I, line 1	**4a**	41,193,236
b	Indicate accounting standard used for line 4a (see instructions): (1) ☐ GAAP (2) ☐ IFRS (3) ☐ Statutory (4) ☐ Tax-basis (5) ☐ Other (specify)		
5a	Net income from nonincludible foreign entities (attach statement)	**5a**	(41,193,236)
b	Net loss from nonincludible foreign entities (attach statement and enter as a positive amount)	**5b**	
6a	Net income from nonincludible U.S. entities (attach statement)	**6a**	( )
b	Net loss from nonincludible U.S. entities (attach statement and enter as a positive amount)	**6b**	
7a	Net income (loss) of other includible foreign disregarded entities (attach statement)	**7a**	
b	Net income (loss) of other includible U.S. disregarded entities (attach statement)	**7b**	
c	Net income (loss) of other includible entities (attach statement)	**7c**	
8	Adjustment to eliminations of transactions between includible entities and nonincludible entities (attach statement)	**8**	
9	Adjustment to reconcile income statement period to tax year (attach statement)	**9**	
10a	Intercompany dividend adjustments to reconcile to line 11 (attach statement)	**10a**	
b	Other statutory accounting adjustments to reconcile to line 11 (attach statement)	**10b**	
c	Other adjustments to reconcile to amount on line 11 (attach statement)	**10c**	
11	**Net income (loss) per income statement of includible corporations.** Combine lines 4 through 10	**11**	135,879

Note: Part I, line 11, must equal Part II, line 30, column (a), or Schedule M-1, line 1 (see instructions).

12 Enter the total amount (not just the corporation's share) of the assets and liabilities of all entities included or removed on the following lines.

		Total Assets	Total Liabilities
a	Included on Part I, line 4 ▶	326,743,223	6,395,936
b	Removed on Part I, line 5 ▶	76,436,862	6,395,936
c	Removed on Part I, line 6 ▶		
d	Included on Part I, line 7 ▶		

Name of corporation (common parent, if consolidated return): Anywork Finance Incorporated

Employer identification number: 00-0000003

Check applicable box(es): (1) ☐ Consolidated group (2) ☐ Parent corp (3) ☐ Consolidated eliminations (4) ☐ Subsidiary corp (5) ☐ Mixed 1120/L/PC group

Check if a sub-consolidated: (6) ☐ 1120 group (7) ☐ 1120 eliminations

Name of subsidiary (if consolidated return):

Employer identification number:

Part II Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return (see instructions)

Income (Loss) Items (Attach statements for lines 1 through 12)	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
1 Income (loss) from equity method foreign corporations				
2 Gross foreign dividends not previously taxed				
3 Subpart F, QEF, and similar income inclusions		43,668,620		43,668,620
4 Gross-up for foreign taxes deemed paid				
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				
22 Original issue discount and other imputed interest				
23a Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities				
b Gross capital gains from Schedule D, excluding amounts from pass-through entities				
c Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
d Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
e Abandonment losses				
f Worthless stock losses (attach statement)				
g Other gain/loss on disposition of assets other than inventory				
24 Capital loss limitation and carryforward used				
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		43,668,620
27 **Total expense/deduction items** (from Part III, line 39)	(256,260)	256,260		0
28 Other items with no differences	(120,387)			(120,387)
29a Mixed groups, see instructions. All others, combine lines 26 through 28	135,879	43,412,354		45,548,233
b PC insurance subgroup reconciliation totals				
c Life insurance subgroup reconciliation totals				
30 **Reconciliation totals.** Combine lines 29a through 29c	135,879	43,412,354		43,548,233

Note: Line 30, column (a), must equal Part I, line 11, and column (d) must equal Form 1120, page 1, line 28.

Name of corporation (common parent, if consolidated return): Anywork Finance Incorporated

Employer identification number: 00-0000003

Check applicable box(es): (1) ☐ Consolidated group (2) ☐ Parent corp (3) ☐ Consolidated eliminations (4) ☐ Subsidiary corp (5) ☐ Mixed 1120/L/PC group

Check if a sub-consolidated: (6) ☐ 1120 group (7) ☐ 1120 eliminations

Name of subsidiary (if consolidated return):

Employer identification number:

Part III Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return—Expense/Deduction Items (see instructions)

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				
7 Foreign withholding taxes				
8 Interest expense (see instructions)				
9 Stock option expense				
10 Other equity-based compensation				
11 Meals and entertainment				
12 Fines and penalties				
13 Judgments, damages, awards, and similar costs				
14 Parachute payments				
15 Compensation with section 162(m) limitation				
16 Pension and profit-sharing				
17 Other post-retirement benefits				
18 Deferred compensation				
19 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				
25 Current year acquisition/reorganization other costs				
26 Amortization/impairment of goodwill				
27 Amortization of acquisition, reorganization, and start-up costs				
28 Other amortization or impairment write-offs				
29 Reserved				
30 Depletion				
31 Depreciation				
32 Bad debt expense				
33 Corporate owned life insurance premiums				
34 Purchase versus lease (for purchasers and/or lessees)				
35 Research and development costs				
36 Section 118 exclusion (attach statement)				
37 Section 162(r)—FDIC premiums paid by certain 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 negative amounts as positive	256,260	(256,260)		0

SCHEDULE N (Form 1120)

Department of the Treasury
Internal Revenue Service

Foreign Operations of U.S. Corporations

▶ 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

2020

Name: Anywork Finance Incorporated

Employer identification number (EIN): 00-0000003

DRAFT AS OF September 17, 2020 DO NOT FILE

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		
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)?		✓
	If "Yes," see instructions for required statement.		
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 ▶ 2		
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 2020 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 ▶ UK		
7a	Is the corporation claiming the extraterritorial income exclusion?		✓
	If "Yes," attach a separate **Form 8873,** Extraterritorial Income Exclusion, for **each** transaction or group of transactions.		
b	Enter the number of Forms 8873 attached to the tax return ▶		
c	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)?		✓

Tax Year 2020
1120 MeF ATS Scenario 3

November 22, 2020

Form **926**
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

Return by a U.S. Transferor of Property to a Foreign Corporation

▶ 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 I U.S. Transferor Information (see instructions)

Name of transferor	**Identifying number** (see instructions)
Anywork Finance, Incorporated	00-0000003

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☑ Yes ☐ No

2 If the transferor was a corporation, complete questions 2a through 2d.

a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? ☑ Yes ☐ No

b Did the transferor remain in existence after the transfer? ☑ Yes ☐ No
If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☑ Yes ☐ No
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? ☐ Yes ☑ No

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.

a List the name and EIN of the transferor's partnership.

Name of partnership	EIN of partnership

b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? ☐ Yes ☑ No

c Is the partner disposing of its **entire** interest in the partnership? ☐ Yes ☑ No

d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? ☐ Yes ☑ No

Part II Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)	**5a Identifying number**, if any
Foreign Finance Corporation	00-0000045
6 Address (including country)	**5b** Reference ID number (see instructions)
75 Any Street, Birmingham, England 126375	

7 Country code of country of incorporation or organization (see instructions)
UK

8 Foreign law characterization (see instructions)
Corporation

9 Is the transferee foreign corporation a controlled foreign corporation? ☑ Yes ☐ No

Part III Information Regarding Transfer of Property (see instructions)

Section A—Cash

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	09-30-2020		100,333		

10 Was cash the only property transferred? . . . . . ☐ Yes ☐ No
If "Yes," skip the remainder of Part III and go to Part IV.

Section B—Other Property (other than intangible property subject to section 367(d))

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	08-25-2020	IDD Stock	25,752	35,452	0
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? . . . . . ☐ Yes ☑ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? . . . . . ☐ Yes ☑ No
If "Yes," go to line 12b.

b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . ☐ Yes ☐ No
If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? . . . . . ☐ Yes ☐ No
If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

d Enter the transferred loss amount included in gross income as required under section 91 ▶ $_____

13 Did the transferor transfer property described in section 367(d)(4)? . . . . . ☐ Yes ☑ No
If "No," skip Section C and questions 14a through 15.

Section C—Intangible Property Subject to Section 367(d)

Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? . . . ☐ Yes ☑ No

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? . . ☐ Yes ☑ No

c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? . . . ☐ Yes ☑ No

d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ▶ $_____

15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)? . . . ☐ Yes ☑ No

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
(a) Before 100 % **(b)** After 100 %

17 Type of nonrecognition transaction (see instructions) ▶ 356

18 Indicate whether any transfer reported in Part III is subject to any of the following.

a Gain recognition under section 904(f)(3) . . . ☐ Yes ☑ No

b Gain recognition under section 904(f)(5)(F) . . . ☐ Yes ☑ No

c Recapture under section 1503(d) . . . ☐ Yes ☑ No

d Exchange gain under section 987 . . . ☐ Yes ☑ No

19 Did this transfer result from a change in entity classification? . . . ☐ Yes ☑ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions . ☐ Yes ☑ No
If "Yes," complete lines 20b and 20c.

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ $_____

c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? . . ☐ Yes ☐ No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions . . . ☐ Yes ☑ No

DRAFT AS OF August 12, 2020 DO NOT FILE

Form **1118**
(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

Foreign Tax Credit—Corporations

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

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

OMB No. 1545-0123

Name of corporation: Anywork Finance Incorporated

Employer identification number: 00-0000003

Use a separate Form 1118 for each applicable category of income (see instructions).

a Separate Category (Enter code—see instructions.) . . . . . ▶ GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶

c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) . . . . . ▶

Schedule A Income or (Loss) Before Adjustments *(Report all amounts in U.S. dollars. See* **Specific Instructions***.)*

	1. EIN or Reference ID Number (see instructions)*	2. Foreign Country or U.S. Possession (enter two-letter code—use a separate line for each) (see instructions)	Gross Income or (Loss) From Sources Outside the United States: 3. Inclusions Under Sections 951(a)(1) and 951A (see instructions) (a) Exclude Gross-Up	3. (b) Gross-Up (section 78)	4. Dividends (see instructions) (a) Exclude Gross-Up	4. (b) Gross-Up (section 78)	5. Interest
A	00-0000045	UK	43,668,620				
B	00-0000046	NL					
C							
Totals (add lines A through C) . . . . . ▶			43,668,620				

	6. Gross Rents, Royalties, and License Fees	7. Sales	8. Gross Income From Performance of Services	9. Section 986(c) Gain	10. Section 987 Gain	11. Section 988 Gain	12. Other (attach schedule)
A							
B							
C							
Totals							

	13. Total (add columns 3(a) through 12)	14. Allocable Deductions: (a) Dividends Received Deduction (see instructions)	(b) Deduction Allowed Under Section 250(a)(1)(A)—Foreign Derived Intangible Income	(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	Rental, Royalty, and Licensing Expenses: (d) Depreciation, Depletion, and Amortization	(e) Other Allocable Expenses	(f) Expenses Allocable to Sales Income
A	43,668,620	43,668,620					
B							
C							
Totals	43,668,620	43,668,620					

	14. Allocable Deductions *(continued)*: (g) Expenses Allocable to Gross Income From Performance of Services	(h) Other Allocable Deductions (attach schedule) (see instructions)	(i) Total Allocable Deductions (add columns 14(a) through 14(h))	15. Apportioned Share of Deductions (enter amount from applicable line of Schedule H, Part II, column (d))	16. Net Operating Loss Deduction	17. Total Deductions (add columns 14(i) through 16)	18. Total Income or (Loss) Before Adjustments (subtract column 17 from column 13)
A		120,387	43,789,007			43,789,007	-120,387
B							
C							
Totals		120,387	43,789,007			43,789,007	-120,387

*For section 863(b) income, NOLs, income from RICs, high-taxed income, section 965, section 951A, and reattribution of income by reason of disregarded payments, use a single line (see instructions). Also, for reporting branches that are QBUs, use a separate line for each such branch.

DRAFT AS OF August 12, 2020 DO NOT FILE

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

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

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

	2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)				3. Tax Deemed Paid (see instructions)
	Other Foreign Taxes Paid or Accrued on:				
	(g) Sales	(h) Services Income	(i) Other	(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))	
A					11,788,082
B					175,000
C					
Totals					11,963,082

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

1a	Total foreign taxes paid or accrued (total from Part I, column 2(j))		
b	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)		
2	Total taxes deemed paid (total from Part I, column 3)	11,963,082	
3	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G)	(11,923,007)	
4	Taxes reclassified under high-tax kickout		
5	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year		
6	Total foreign taxes (combine lines 1a through 5)		40,075
7	Enter the amount from the applicable column of Schedule J, Part I, line 11 (see instructions). If Schedule J is **not** required to be completed, enter the result from the "Totals" line of column 18 of the applicable Schedule A		0
8a	Total taxable income from all sources (enter taxable income from the corporation's tax return)	1,417,113	
b	Adjustments to line 8a (see instructions)		
c	Subtract line 8b from line 8a		1,417,113
9	Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1		0
10	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)		297,594
11	Multiply line 9 by line 10		0
12	Increase in limitation (section 960(c))		0
13	Credit limitation (add lines 11 and 12) (see instructions)		0
14	**Separate foreign tax credit** (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III ▶		0

DRAFT AS OF August 12, 2020 DO NOT FILE

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

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

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

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

Use this schedule to report the tax deemed paid by the corporation with respect to section 951(a)(1) inclusions of earnings from foreign corporations under section 960(a). For each line in Schedule C, include the column 10 amount in column 3 of the line in Schedule B, Part I that corresponds with the identifying number specified in column 1 of Schedule A and that also corresponds with the identifying number entered in column 1b of this Schedule C (see instructions).

1a. Name of Foreign Corporation	**1b.** EIN or Reference ID Number of the Foreign Corporation (see instructions)	**1c.** QBU Reference ID (if applicable)	**2.** Tax Year End (Year/Month) (see instructions)	**3.** Country of Incorporation (enter country code—see instructions)	**4.** Functional Currency of Foreign Corporation (enter code - see instructions)	**5.** Subpart F Income Group		
						(a) Reg. sec. 1.960-1(d)(2)(ii)(B)(2)(enter code)	**(b)** Reg. sec. 1.904-4(c)(3)(i)-(iv) (enter code)	**(c)** Unit
Foreign Finance Corp	00-0000045		201912	UK	GBP			

6. Total Net Income in Subpart F Income Group (in functional currency of foreign corporation)	**7.** Total Current Year Taxes in Subpart F Income Group (in U.S. Dollars)	**8.** Section 951(a)(1) Inclusion Attributable to Subpart F Income Group		**9.** Divide column 8(a) by column 6	**10.** Tax Deemed Paid (multiply column 7 by column 9)
		(a) Functional Currency	**(b)** U.S. Dollars		
161,917,394	3,180,665	600,093,170	43,688,620	3.70616865	11,788,082

Total (add amounts in column 10) ▶ 11,788,082

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

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

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

1a. Name of Foreign Corporation	**1b.** EIN or Reference ID Number of the Foreign Corporation (see instructions)	**2.** Tax Year End (Year/Month) (see instructions)	**3.** Country of Incorporation (enter country code—see instructions)	**4.** Functional Currency of Foreign Corporation (enter code)	**5.** Pro rata share of CFC's tested income from applicable Form 8992 schedule (see instructions)	**6.** CFC's tested income from applicable Form 8992 schedule (see instructions)	**7.** Divide column 5 by column 6	**8.** CFC's tested foreign income taxes from Schedule Q (Form 5471) (see instructions)	**9.** Pro rata share of tested foreign income taxes paid or accrued by CFC (Multiply amount in column 7 by amount in column 8)
Total (add amounts in column 5) . . . . . ▶									
Total (add amounts in column 9) . . . . . ▶									

Part II—Foreign Income Tax Deemed Paid

1. Global Intangible Low-Taxed Income (Section 951A Inclusion)	**2. Inclusion Percentage.** Divide Part II, Column 1, by Part I, Column 5 Total	**3.** Multiply Part I, Column 9 Total, by Part II, Column 2 Percentage	**4.** Tax Deemed Paid (Multiply Part II, column 3, by 80%. Enter the result here and include on the line of Schedule B, Part I, column 3 that corresponds with the line with "951A" in column 2 of Schedule A.)

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

Part I—Tax Deemed Paid by Domestic Corporation

Use this part to report the tax deemed paid by the domestic corporation with respect to distributions of PTEP from first-tier foreign corporations under section 960(b). For each line in Schedule E, Part I, include the column 11 amount in column 3 of the line in Schedule B, Part I that corresponds with the identifying number specified in column 1 of Schedule A and that also corresponds with the identifying number specified in column 1b of this Schedule E, Part I (see instructions).

1a. Name of Distributing Foreign Corporation	**1b.** EIN or Reference ID Number of the Foreign Corporation (see instructions)	**2.** Tax Year End (Year/Month) (see instructions)	**3.** Country of Incorporation (enter country code—see instructions)	**4.** Functional Currency of the Distributing Foreign Corporation	**5.** PTEP Group (enter code)	**6.** Annual PTEP account (enter year)	**7.** Total amount of PTEP in the PTEP Group	**8.** Total amount of the PTEP group taxes with respect to PTEP group	**9.** Distribution from the PTEP Group	**10.** Divide column 9 by column 7	**11.** Foreign income taxes properly attributable to PTEP and not previously deemed paid (multiply column 8 by column 10)
Foreign Sands	00-0000046	201912	NL	EUR					3,500,000		175,000

Total (add amounts in column 11) . . . . . ▶

Part II—Tax Deemed Paid by First- and Lower-Tier Foreign Corporations

Use this part to report the tax deemed paid by a foreign corporation with respect to distributions of PTEP from lower-tier foreign corporations under section 960(b) that relate to distributions reported in Part I (see instructions).

1a. Name of Distributing Foreign Corporation	**1b.** EIN or Reference ID Number of the Foreign Corporation (see instructions)	**2.** Tax Year End (Year/Month) (see instructions)	**3.** Country of Incorporation (enter country code—see instructions)	**4a.** Name of Recipient Foreign Corporation	**4b.** EIN or Reference ID Number of the Foreign Corporation (see instructions)	**5.** Tax Year End (Year/Month) (see instructions)	**6.** Country of Incorporation (enter country code—see instructions)
Foreign Sands	00-0000046	201812	CA			201812	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	**11.** Total Amount of the PTEP group taxes with respect to PTEP group	**12.** PTEP Distributed	**13.** Divide column 12 by column 10	**14.** Foreign income taxes properly attributable to PTEP and not previously deemed paid (multiply column 11 by column 13)
EUR				3,500,000			175,000

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

Part I—Reduction Amounts

A	Reduction of Taxes Under Section 901(e)—Attach separate schedule	
B	Reduction of Foreign Oil and Gas Taxes—Enter amount from Schedule I, Part II, line 4	
C	Reduction of Taxes Due to International Boycott Provisions—Enter appropriate portion from Schedule C (Form 5713) (see instructions). **Important:** Enter only "specifically attributable taxes" here	
D	Reduction of Taxes for Section 6038(c) Penalty—Attach separate schedule	
E	Taxes suspended under section 909	
F	Other Reductions of Taxes **1.** Enter code—see instructions ▶ OTH **2.** If more than one code is entered on line F1 or if code OTH is entered on line F1, attach schedule (see instructions).	11,923,007
Total (add lines A through F). Enter here and on Schedule B, Part II, line 3 ▶		11,923,007

Part II—Other Information

G	Check this box if, during the tax year, the corporation paid or accrued any foreign tax that was disqualified for credit under section 901(m) ▶	☐
H	Check this box if, during the tax year, the corporation paid or accrued any foreign tax that was disqualified for credit under section 901(j), (k), or (l) ▶	☐

November 22, 2020

Form **1118**
(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

Foreign Tax Credit—Corporations

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

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

OMB No. 1545-0123

Name of corporation: Anywork Finance Incorporated

Employer identification number: 00-0000003

Use a separate Form 1118 for each applicable category of income (see instructions).

a Separate Category (Enter code—see instructions.) . . . . . ▶ 951A
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) . . . . . ▶

Schedule A Income or (Loss) Before Adjustments *(Report all amounts in U.S. dollars. See* **Specific Instructions***.)*

	1. EIN or Reference ID Number (see instructions)*	2. Foreign Country or U.S. Possession (enter two-letter code—use a separate line for each) (see instructions)	Gross Income or (Loss) From Sources Outside the United States: 3. Inclusions Under Sections 951(a)(1) and 951A (see instructions) (a) Exclude Gross-Up	3. (b) Gross-Up (section 78)	4. Dividends (see instructions) (a) Exclude Gross-Up	4. (b) Gross-Up (section 78)	5. Interest
A	00-0000046	NL	700,000	175,000			
B							
C							
Totals (add lines A through C) . . . . . ▶			700,000	175,000			

	6. Gross Rents, Royalties, and License Fees	7. Sales	8. Gross Income From Performance of Services	9. Section 986(c) Gain	10. Section 987 Gain	11. Section 988 Gain	12. Other (attach schedule)
A							
B							
C							
Totals							

	13. Total (add columns 3(a) through 12)	14. Allocable Deductions: (a) Dividends Received Deduction (see instructions)	(b) Deduction Allowed Under Section 250(a)(1)(A)—Foreign Derived Intangible Income	(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	Rental, Royalty, and Licensing Expenses: (d) Depreciation, Depletion, and Amortization	(e) Other Allocable Expenses	(f) Expenses Allocable to Sales Income
A	875,000			437,500			
B							
C							
Totals	875,000			437,500			

	14. Allocable Deductions *(continued)*: (g) Expenses Allocable to Gross Income From Performance of Services	(h) Other Allocable Deductions (attach schedule) (see instructions)	(i) Total Allocable Deductions (add columns 14(a) through 14(h))	15. Apportioned Share of Deductions (enter amount from applicable line of Schedule H, Part II, column (d))	16. Net Operating Loss Deduction	17. Total Deductions (add columns 14(i) through 16)	18. Total Income or (Loss) Before Adjustments (subtract column 17 from column 13)
A			437,500			437,500	437,500
B							
C							
Totals			437,500			437,500	437,500

*For section 863(b) income, NOLs, income from RICs, high-taxed income, section 965, section 951A, and reattribution of income by reason of disregarded payments, use a single line (see instructions). Also, for reporting branches that are QBUs, use a separate line for each such branch.

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

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

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

	2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)				3. Tax Deemed Paid (see instructions)
	Other Foreign Taxes Paid or Accrued on:				
	(g) Sales	(h) Services Income	(i) Other	(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))	
A					140,000
B					
C					
Totals					

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

1a	Total foreign taxes paid or accrued (total from Part I, column 2(j))		
b	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)		
2	Total taxes deemed paid (total from Part I, column 3)	140,000	
3	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G)	( )	
4	Taxes reclassified under high-tax kickout		
5	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year		
6	Total foreign taxes (combine lines 1a through 5)		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, enter the result from the "Totals" line of column 18 of the applicable Schedule A		366,084
8a	Total taxable income from all sources (enter taxable income from the corporation's tax return)	1,417,113	
b	Adjustments to line 8a (see instructions)		
c	Subtract line 8b from line 8a		1,417,113
9	Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1		0.258330846
10	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)		297,594
11	Multiply line 9 by line 10		76,878
12	Increase in limitation (section 960(c))		0
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 ▶		76,878

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

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

1	Credit for taxes on section 951A category income	76,878	
2	Credit for taxes on foreign branch category income	17,572	
3	Credit for taxes on passive category income	35,144	
4	Credit for taxes on general category income	0	
5	Credit for taxes on section 901(j) category income (combine all such credits on this line)		
6	Credit for taxes on income re-sourced by treaty (combine all such credits on this line)		
7	Total (add lines 1 through 6)		129,594
8	Reduction in credit for international boycott operations (see instructions)		
9	**Total foreign tax credit** (subtract line 8 from line 7). Enter here and on the appropriate line of the corporation's tax return ▶		129,594

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

Use this schedule to report the tax deemed paid by the corporation with respect to section 951(a)(1) inclusions of earnings from foreign corporations under section 960(a). For each line in Schedule C, include the column 10 amount in column 3 of the line in Schedule B, Part I that corresponds with the identifying number specified in column 1 of Schedule A and that also corresponds with the identifying number entered in column 1b of this Schedule C (see instructions).

1a. Name of Foreign Corporation	**1b.** EIN or Reference ID Number of the Foreign Corporation (see instructions)	**1c.** QBU Reference ID (if applicable)	**2.** Tax Year End (Year/Month) (see instructions)	**3.** Country of Incorporation (enter country code—see instructions)	**4.** Functional Currency of Foreign Corporation (enter code - see instructions)	**5.** Subpart F Income Group		
						(a) Reg. sec. 1.960-1(d)(2)(ii)(B)(2)(enter code)	**(b)** Reg. sec. 1.904-4(c)(3)(i)-(iv) (enter code)	**(c)** Unit

6. Total Net Income in Subpart F Income Group (in functional currency of foreign corporation)	**7.** Total Current Year Taxes in Subpart F Income Group (in U.S. Dollars)	**8.** Section 951(a)(1) Inclusion Attributable to Subpart F Income Group		**9.** Divide column 8(a) by column 6	**10.** Tax Deemed Paid (multiply column 7 by column 9)
		(a) Functional Currency	**(b)** U.S. Dollars		

Total (add amounts in column 10) ▶

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

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

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

1a. Name of Foreign Corporation	**1b.** EIN or Reference ID Number of the Foreign Corporation (see instructions)	**2.** Tax Year End (Year/Month) (see instructions)	**3.** Country of Incorporation (enter country code—see instructions)	**4.** Functional Currency of Foreign Corporation (enter code)	**5.** Pro rata share of CFC's tested income from applicable Form 8992 schedule (see instructions)	**6.** CFC's tested income from applicable Form 8992 schedule (see instructions)	**7.** Divide column 5 by column 6	**8.** CFC's tested foreign income taxes from Schedule Q (Form 5471) (see instructions)	**9.** Pro rata share of tested foreign income taxes paid or accrued by CFC (Multiply amount in column 7 by amount in column 8)
Foreign Sands	00-0000046	201912	NL	EUR	800,000	200,000	4	50,000	200,000
Total (add amounts in column 5) . . . . . ▶									
Total (add amounts in column 9) . . . . . ▶									200,000

Part II—Foreign Income Tax Deemed Paid

1. Global Intangible Low-Taxed Income (Section 951A Inclusion)	**2. Inclusion Percentage.** Divide Part II, Column 1, by Part I, Column 5 Total	**3.** Multiply Part I, Column 9 Total, by Part II, Column 2 Percentage	**4.** Tax Deemed Paid (Multiply Part II, column 3, by 80%. Enter the result here and include on the line of Schedule B, Part I, column 3 that corresponds with the line with "951A" in column 2 of Schedule A.)
700,000	.875	175,000	140,000

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November 22, 2020

Tax Year 2020
1120 MeF ATS Scenario 3

Form **1118**
(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

Foreign Tax Credit—Corporations

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

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

OMB No. 1545-0123

Name of corporation: Anywork Finance Incorporated

Employer identification number: 00-0000003

Use a separate Form 1118 for each applicable category of income (see instructions).

a Separate Category (Enter code—see instructions.) . . . . . ▶ FB
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) . . . . . ▶

Schedule A Income or (Loss) Before Adjustments *(Report all amounts in U.S. dollars. See* **Specific Instructions***.)*

	1. EIN or Reference ID Number (see instructions)*	2. Foreign Country or U.S. Possession (enter two-letter code—use a separate line for each) (see instructions)	Gross Income or (Loss) From Sources Outside the United States: 3. Inclusions Under Sections 951(a)(1) and 951A (see instructions) (a) Exclude Gross-Up	3. (b) Gross-Up (section 78)	4. Dividends (see instructions) (a) Exclude Gross-Up	4. (b) Gross-Up (section 78)	5. Interest
A	00-0000018	NL					
B							
C							
Totals (add lines A through C) . . . . . ▶							

	6. Gross Rents, Royalties, and License Fees	7. Sales	8. Gross Income From Performance of Services	9. Section 986(c) Gain	10. Section 987 Gain	11. Section 988 Gain	12. Other (attach schedule)
A		200,000	100,000				
B							
C							
Totals		200,000	100,000				

	13. Total (add columns 3(a) through 12)	14. Allocable Deductions: (a) Dividends Received Deduction (see instructions)	(b) Deduction Allowed Under Section 250(a)(1)(A)—Foreign Derived Intangible Income	(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	Rental, Royalty, and Licensing Expenses: (d) Depreciation, Depletion, and Amortization	(e) Other Allocable Expenses	(f) Expenses Allocable to Sales Income
A	300,000						150,000
B							
C							
Totals	300,000						150,000

	14. Allocable Deductions *(continued)*: (g) Expenses Allocable to Gross Income From Performance of Services	(h) Other Allocable Deductions (attach schedule) (see instructions)	(i) Total Allocable Deductions (add columns 14(a) through 14(h))	15. Apportioned Share of Deductions (enter amount from applicable line of Schedule H, Part II, column (d))	16. Net Operating Loss Deduction	17. Total Deductions (add columns 14(i) through 16)	18. Total Income or (Loss) Before Adjustments (subtract column 17 from column 13)
A	50,000					200,000	100,000
B							
C							
Totals	50,000					200,000	100,000

*For section 863(b) income, NOLs, income from RICs, high-taxed income, section 965, section 951A, and reattribution of income by reason of disregarded payments, use a single line (see instructions). Also, for reporting branches that are QBUs, use a separate line for each such branch.

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

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

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

	2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)				3. Tax Deemed Paid (see instructions)
	Other Foreign Taxes Paid or Accrued on:				
	(g) Sales	(h) Services Income	(i) Other	(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))	
A	13,333	6,667		20,000	
B					
C					
Totals					

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

1a	Total foreign taxes paid or accrued (total from Part I, column 2(j))	20,000	
b	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)		
2	Total taxes deemed paid (total from Part I, column 3)		
3	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G)	( )	
4	Taxes reclassified under high-tax kickout		
5	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year		
6	Total foreign taxes (combine lines 1a through 5)		20,000
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, enter the result from the "Totals" line of column 18 of the applicable Schedule A		83,676
8a	Total taxable income from all sources (enter taxable income from the corporation's tax return)	1,417,113	
b	Adjustments to line 8a (see instructions)		
c	Subtract line 8b from line 8a		1,417,113
9	Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1		0.059046809
10	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)		297,594
11	Multiply line 9 by line 10		17,572
12	Increase in limitation (section 960(c))		0
13	Credit limitation (add lines 11 and 12) (see instructions)		17,572
14	**Separate foreign tax credit** (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III ▶		17,572

DRAFT AS OF August 12, 2020 DO NOT FILE

Tax Year 2020
1120 MeF ATS Scenario 3

November 22, 2020

Form **1118**
(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

Foreign Tax Credit—Corporations

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

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

OMB No. 1545-0123

Name of corporation: Anywork Finance Incorporated

Employer identification number: 00-0000003

Use a separate Form 1118 for each applicable category of income (see instructions).

a Separate Category (Enter code—see instructions.) . . . . . ▶ PAS
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) . . . . . ▶

Schedule A Income or (Loss) Before Adjustments *(Report all amounts in U.S. dollars. See* **Specific Instructions***.)*

	1. EIN or Reference ID Number (see instructions)*	2. Foreign Country or U.S. Possession (enter two-letter code—use a separate line for each) (see instructions)	Gross Income or (Loss) From Sources Outside the United States: 3. Inclusions Under Sections 951(a)(1) and 951A (see instructions) (a) Exclude Gross-Up	3. (b) Gross-Up (section 78)	4. Dividends (see instructions) (a) Exclude Gross-Up	4. (b) Gross-Up (section 78)	5. Interest
A	00-0000046	NL	160,000	40,000			
B							
C							
Totals (add lines A through C) . . . . . ▶			160,000	40,000			

	6. Gross Rents, Royalties, and License Fees	7. Sales	8. Gross Income From Performance of Services	9. Section 986(c) Gain	10. Section 987 Gain	11. Section 988 Gain	12. Other (attach schedule)
A							
B							
C							
Totals							

	13. Total (add columns 3(a) through 12)	14. Allocable Deductions: (a) Dividends Received Deduction (see instructions)	(b) Deduction Allowed Under Section 250(a)(1)(A)—Foreign Derived Intangible Income	(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	Rental, Royalty, and Licensing Expenses: (d) Depreciation, Depletion, and Amortization	(e) Other Allocable Expenses	(f) Expenses Allocable to Sales Income
A	200,000						
B							
C							
Totals	200,000						

	14. Allocable Deductions *(continued)*: (g) Expenses Allocable to Gross Income From Performance of Services	(h) Other Allocable Deductions (attach schedule) (see instructions)	(i) Total Allocable Deductions (add columns 14(a) through 14(h))	15. Apportioned Share of Deductions (enter amount from applicable line of Schedule H, Part II, column (d))	16. Net Operating Loss Deduction	17. Total Deductions (add columns 14(i) through 16)	18. Total Income or (Loss) Before Adjustments (subtract column 17 from column 13)
A							200,000
B							
C							
Totals							200,000

*For section 863(b) income, NOLs, income from RICs, high-taxed income, section 965, section 951A, and reattribution of income by reason of disregarded payments, use a single line (see instructions). Also, for reporting branches that are QBUs, use a separate line for each such branch.

DRAFT AS OF August 12, 2020 DO NOT FILE

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

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

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

	2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)				3. Tax Deemed Paid (see instructions)
	Other Foreign Taxes Paid or Accrued on:				
	(g) Sales	(h) Services Income	(i) Other	(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))	
A					40,000
B					
C					
Totals					

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

1a	Total foreign taxes paid or accrued (total from Part I, column 2(j))	40,000	
b	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)		
2	Total taxes deemed paid (total from Part I, column 3)		
3	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G)	( )	
4	Taxes reclassified under high-tax kickout		
5	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year		
6	Total foreign taxes (combine lines 1a through 5)		40,000
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, enter the result from the "Totals" line of column 18 of the applicable Schedule A		167,353
8a	Total taxable income from all sources (enter taxable income from the corporation's tax return)	1,417,113	
b	Adjustments to line 8a (see instructions)		
c	Subtract line 8b from line 8a		1,417,113
9	Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1		0.118094323
10	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)		297,594
11	Multiply line 9 by line 10		35,144
12	Increase in limitation (section 960(c))		0
13	Credit limitation (add lines 11 and 12) (see instructions)		35,144
14	**Separate foreign tax credit** (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III ▶		35,144

Tax Year 2020
1120 MeF ATS Scenario 3

November 22, 2020

SCHEDULE K (Form 1118)

(Rev. December 2018)

Department of the Treasury
Internal Revenue Service

Foreign Tax Carryover Reconciliation Schedule

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

▶ See separate instructions.
▶ Attach to Form 1118.
▶ Go to *www.irs.gov/Form1118* for instructions and the latest information.

OMB No. 1545-0123

Name of corporation: Anywork Finance Incorporated

Employer identification number: 00 0000003

Use a separate Schedule K (Form 1118) for each category of income (see instructions).

a Separate Category (enter code—see instructions) . . . . . ▶ FB

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶

c If code RBT is entered on line a, enter the country code for the treaty country (see instructions) . . . . . ▶

	Foreign Tax Carryover Reconciliation	(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 Preceding Tax Year	(vii) Subtotal (add columns (i) through (vi))
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):							
a	Carryback adjustment (see instructions)							
b	Adjustments for section 905(c) redeterminations (see instructions)							
c								
d								
e								
f								
g								
3	Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2)							
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							
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.	-0-						

For Paperwork Reduction Act Notice, see the Instructions for Form 1118.

Cat. No. 51904R

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

	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):							
a	Carryback adjustment (see instructions)							
b	Adjustments for section 905(c) redeterminations (see instructions)							
c								
d								
e								
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

Tax Year 2020
1120 MeF ATS Scenario 3

November 22, 2020

SCHEDULE K (Form 1118)

(Rev. December 2018)

Department of the Treasury
Internal Revenue Service

Foreign Tax Carryover Reconciliation Schedule

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

▶ See separate instructions.
▶ Attach to Form 1118.
▶ Go to *www.irs.gov/Form1118* for instructions and the latest information.

OMB No. 1545-0123

Name of corporation: Anywork Finance Incorporated

Employer identification number: 00 0000003

Use a separate Schedule K (Form 1118) for each category of income (see instructions).

a Separate Category (enter code—see instructions) . . . . . ▶ PAS

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶

c If code RBT is entered on line a, enter the country code for the treaty country (see instructions) . . . . . ▶

	Foreign Tax Carryover Reconciliation	(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 Preceding Tax Year	(vii) Subtotal (add columns (i) through (vi))
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):							
a	Carryback adjustment (see instructions)							
b	Adjustments for section 905(c) redeterminations (see instructions)							
c								
d								
e								
f								
g								
3	Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2)							
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							
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.	-0-						

For Paperwork Reduction Act Notice, see the Instructions for Form 1118.

Cat. No. 51904R

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

	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):							
a	Carryback adjustment (see instructions)							
b	Adjustments for section 905(c) redeterminations (see instructions)							
c								
d								
e								
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						4,856	4,856
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.						4,856	4,856

DRAFT AS OF September 9, 2020 DO NOT FILE

Schedule J (Form 1118)

(Rev. December 2020)

Department of the Treasury
Internal Revenue Service

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

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

▶ **Attach to Form 1118.**

OMB No. 1545-0123

Name of corporation: Anywork Finance, Incorporated

Employer identification number: 00-0000003

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:						
a	Section 951A income		( )	( )	( )	( )	
b	Foreign branch income	( )		( )	( )	( )	
c	Passive category income	( )	( )		( )	( )	
d	General category income	(71,416)	(16,324)	(32,647)	120,387	( )	
e	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:						
a	Section 951A income	( )					
b	Foreign branch income		( )				
c	Passive category income			( )			
d	General category income				( )		
e	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.

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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
a	Section 951A income						
b	Foreign branch income						
c	Passive category income						
d	General category income	71,416	16,324	32,647			
e	Other income* (identify ▶)						

Part III **Overall Foreign Loss Account Balances (section 904(f)(1))** *Complete for **each** separate limitation income category.*

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 IV **Overall Domestic Loss Account 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.

Form **5471**

(Rev. December 2020)

Department of the Treasury
Internal Revenue Service

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

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

Information furnished for the foreign corporation's annual accounting period (tax year required by section 898) (see instructions) beginning Jan 1 , 20 20 , and ending Dec 31 , 20 20

OMB No. 1545-0123

Attachment Sequence No. **121**

DRAFT AS OF August 24, 2020 DO NOT FILE

Name of person filing this return: Anywork Finance Incorporated

A Identifying number: 00-0000003

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address): 35 Any Street

B Category of filer (See instructions. Check applicable box(es).): 1a ☐ 1b ☐ 1c ☐ 2 ☑ 3 ☑ 4 ☑ 5a ☐ 5b ☐ 5c ☐

City or town, state, and ZIP code: Anytown, NY 10006

C Enter the total percentage of the foreign corporation's voting stock you owned at the end of its annual accounting period 100 %

Filer's tax year beginning January 01 , 20 20 , and ending December 31, , 20 20

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:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			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:
Foreign Finance Corporation
75 Any Street
Birmingham, England 126375

b(1) Employer identification number, if any: 00-0000045

b(2) Reference ID number (see instructions): ABC1234

c Country under whose laws incorporated: UK

d Date of incorporation	**e** Principal place of business	**f** Principal business activity code number	**g** Principal business activity	**h** Functional currency code
01/01/1990	United Kingdom	523900	Financial Investment	GBP

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

a Name, address, and identifying number of branch office or agent (if any) in the United States

b If a U.S. income tax return was filed, enter:

(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)

c Name and address of foreign corporation's statutory or resident agent in country of incorporation:
Samuel Addams
75 Any Street
Birmingham, England 126375

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

Schedule A Stock of the Foreign Corporation

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

Schedule B Shareholders of Foreign Corporation

Part I U.S. Shareholders of Foreign Corporation (see instructions)

(a) Name, address, and identifying number of shareholder	(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 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)
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003	Common	750	1,000	
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003	Class B Preferred	193,710	258,280	

DRAFT AS OF
August 24, 2020
DO NOT FILE

Part II Direct Shareholders of Foreign Corporation (see instructions)

(a) Name, address, and identifying number of shareholder. Also, include country of incorporation or formation, if applicable.	(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 annual accounting period	(d) Number of shares held at end of annual accounting period

Schedule C Income Statement (see instructions)

Important: *Report all information in functional currency in accordance with U.S. 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 DASTM corporations.*

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				Functional Currency	U.S. Dollars
Income	1a	Gross receipts or sales	1a		
	b	Returns and allowances	1b		
	c	Subtract line 1b from line 1a	1c		
	2	Cost of goods sold	2		
	3	Gross profit (subtract line 2 from line 1c)	3		
	4	Dividends	4		
	5	Interest	5	28,862,341	42,689,456
	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
Deductions	11	Compensation not deducted elsewhere	11		
	12a	Rents	12a	2,588,175	3,828,095
	b	Royalties and license fees	12b		
	13	Interest	13	36,977	54,692
	14	Depreciation not deducted elsewhere	14		
	15	Depletion	15		
	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
Net Income	19	Net income or (loss) before unusual or infrequently occurring items, and income tax expense (benefit) (subtract line 18 from line 10)	19	40,669,712	60,153,397
	20	Unusual or infrequently occurring items	20	(12,818,965)	(18,960,161)
	21a	Income tax expense (benefit)—current	21a		
	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
Other Comprehensive Income	23a	Foreign currency translation adjustments	23a		
	b	Other	23b		
	c	Income tax expense (benefit) related to other comprehensive income	23c		
	24	Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c)	24		

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.*

DRAFT AS OF August 24, 2020 DO NOT FILE

	Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1	Cash	1	8,557,500	3,281,502
2a	Trade notes and accounts receivable	2a	855,858	15,006,554
b	Less allowance for bad debts	2b	( )	( )
3	Derivatives	3		
4	Inventories	4		
5	Other current assets (attach statement)	5	255,108	243,012
6	Loans to shareholders and other related persons	6	26,569,964	
7	Investment in subsidiaries (attach statement)	7		
8	Other investments (attach statement)	8	57,437	36,820,277
9a	Buildings and other depreciable assets	9a		
b	Less accumulated depreciation	9b	( )	( )
10a	Depletable assets	10a		
b	Less accumulated depletion	10b	( )	( )
11	Land (net of any amortization)	11		
12	Intangible assets:			
a	Goodwill	12a		
b	Organization costs	12b		
c	Patents, trademarks, and other intangible assets	12c	11,727,492	21,085,517
d	Less accumulated amortization for lines 12a, 12b, and 12c	12d	( )	( )
13	Other assets (attach statement)	13		
14	Total assets	14	48,023,359	76,436,862
	Liabilities and Shareholders' Equity			
15	Accounts payable	15		68,312
16	Other current liabilities (attach statement)	16	4,001,670	5,080,202
17	Derivatives	17		
18	Loans from shareholders and other related persons	18		
19	Other liabilities (attach statement)	19	2,016,428	1,247,422
20	Capital stock:			
a	Preferred stock	20a	57,545,333	76,727,110
b	Common stock	20b	750,000	1,000,000
21	Paid-in or capital surplus (attach reconciliation)	21		
22	Retained earnings	22		
23	Less cost of treasury stock	23	(16,290,072)	(7,686,184)
24	Total liabilities and shareholders' equity	24	48,023,359	76,436,862

Schedule G Other Information

		Yes	No
1	During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign 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 disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)?		✓
	If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		
4a	During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)?		✓
	If "Yes," complete lines 4b and 4c.		
b	Enter the total amount of the base erosion payments ▶ $		
c	Enter the total amount of the base erosion tax benefit ▶ $		
5a	During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A?		✓
	If "Yes," complete line 5b.		
b	Enter the total amount of the disallowed deductions (see instructions) ▶ $		

Schedule G Other Information *(continued)*

		Yes	No
6a	Is the filer of this Form 5471 claiming a foreign-derived intangible income deduction (under section 250) with respect to any amounts listed on Schedule M?		✓
	If "Yes," complete lines 6b, 6c, and 6d.		
b	Enter the amount of gross income derived from sales, leases, exchanges, or other dispositions (but not licenses) from transactions with the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) (see instructions) ▶ $		
c	Enter the amount of gross income derived from a license of property to the foreign corporation that the filer included in its computation of FDDEI (see instructions) ▶ $		
d	Enter the amount of gross income derived from services provided to the foreign corporation that the filer included in its computation of FDDEI (see instructions) ▶ $		
7	During the tax year, was the foreign corporation a participant in any cost-sharing arrangement?		✓
8	During the course of the tax year, did the foreign corporation become a participant in any cost-sharing arrangement?		✓
9	If the answer to question 7 is "Yes," was the foreign corporation a participant in a cost-sharing arrangement that was in effect before January 5, 2009?		
10	If the answer to question 7 is "Yes," did a U.S. taxpayer make any platform contributions as defined under Regulations section 1.482-7(c) to that cost-sharing arrangement during the taxable year?		
11	If the answer to question 10 is "Yes," enter the present value of the platform contributions in U.S. dollars ▶ $		
12	If the answer to question 10 is "Yes," check the box for the method under Regulations section 1.482-7(g) used to determine the price of the platform contribution transaction(s): ☐ Comparable uncontrolled transaction method ☐ Income method ☐ Acquisition price method ☐ Market capitalization method ☐ Residual profit split method ☐ Unspecified methods		
13	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 section 1.358-6(b)(2))?		✓
14a	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 taxable year?		✓
	If "Yes," go to line 14b.		
b	Enter the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for the taxable year ▶ $		
15	During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section 1.7874-12(a)(9)?		✓
	If "Yes," see instructions and attach statement.		
16	During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations section 1.6011-4?		✓
	If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		
17	During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		✓
18	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?		✓
19	Did you answer "Yes" to any of the questions in the instructions for line 19?		✓
	If "Yes," enter the corresponding code(s) from the instructions and attach statement ▶		
20	Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)?		✓
	If "Yes," enter the amount ▶ $		
21	Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to the current tax year (see instructions)?		✓
	If "Yes," enter the amount ▶ $		
22a	Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year (see instructions)?		
b	If the answer to question 22a 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)?		

DRAFT AS OF August 24, 2020 DO NOT FILE

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	Section 964(e)(4) subpart F dividend income from the sale of stock of a lower-tier foreign corporation (see instructions)	1a	43,668,620
b	Section 245A(e)(2) subpart F income from hybrid dividends of tiered corporations (see instructions)	1b	
c	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	
e	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	
c	Extraordinary reduction amounts (see instructions)	5c	
d	Section 245A(e) dividends (see instructions)	5d	
e	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 corporation 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 year $_____ and at the end of the tax year $ _____. Provide an attachment detailing any changes from the beginning to the ending balances.

c Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of the CFC year $_____ and at the end of the tax year $ _____. Provide an attachment detailing any changes from 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) $

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Form **5471**

(Rev. December 2020)

Department of the Treasury
Internal Revenue Service

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

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

Information furnished for the foreign corporation's annual accounting period (tax year required by section 898) (see instructions) beginning Jan 1 , 20 20 , and ending Dec 31 , 20 20

OMB No. 1545-0123

Attachment Sequence No. **121**

DRAFT AS OF August 24, 2020 DO NOT FILE

Name of person filing this return: Anywork Finance Incorporated

A Identifying number: 00-0000003

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address): 35 Any Street

B Category of filer (See instructions. Check applicable box(es).): 1a ☐ 1b ☐ 1c ☐ 2 ☑ 3 ☑ 4 ☑ 5a ☐ 5b ☐ 5c ☐

City or town, state, and ZIP code: Anytown, NY 10006

C Enter the total percentage of the foreign corporation's voting stock you owned at the end of its annual accounting period 100 %

Filer's tax year beginning January 01 , 20 20 , and ending December 31, , 20 20

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:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			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:
Foreign Sands
80 Any Street
Birmingham, England 126375

b(1) Employer identification number, if any: 00-0000046

b(2) Reference ID number (see instructions): ABC8989

c Country under whose laws incorporated: NL

d Date of incorporation	**e** Principal place of business	**f** Principal business activity code number	**g** Principal business activity	**h** Functional currency code
01/01/1990	Netherlands	523900	Financial Investment	EUR

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

a Name, address, and identifying number of branch office or agent (if any) in the United States

b If a U.S. income tax return was filed, enter:

(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)

c Name and address of foreign corporation's statutory or resident agent in country of incorporation
George Washington
80 Any Street
Amsterdam, Netherlands

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

Schedule A Stock of the Foreign Corporation

(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period
Common	20,000	40,000
Preferred	200,000	400,000

Schedule B Shareholders of Foreign Corporation

Part I U.S. Shareholders of Foreign Corporation (see instructions)

(a) Name, address, and identifying number of shareholder	(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 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)
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003	Common	20,000	40,000	
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003	Class B Preferred	200,000	400,000	

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August 24, 2020
DO NOT FILE

Part II Direct Shareholders of Foreign Corporation (see instructions)

(a) Name, address, and identifying number of shareholder. Also, include country of incorporation or formation, if applicable.	(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 annual accounting period	(d) Number of shares held at end of annual accounting period

Schedule C **Income Statement** (see instructions)

Important: *Report all information in functional currency in accordance with U.S. 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 DASTM corporations.*

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				Functional Currency	U.S. Dollars
Income	1a	Gross receipts or sales	1a	10,000,000	10,000,000
	b	Returns and allowances	1b		
	c	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
	4	Dividends	4		
	5	Interest	5		
	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
Deductions	11	Compensation not deducted elsewhere	11		
	12a	Rents	12a		
	b	Royalties and license fees	12b	200,000	200,000
	13	Interest	13		
	14	Depreciation not deducted elsewhere	14	1,000,000	1,000,000
	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
Net Income	19	Net income or (loss) before unusual or infrequently occurring items, and income tax expense (benefit) (subtract line 18 from line 10)	19	1,200,000	1,200,000
	20	Unusual or infrequently occurring items	20		
	21a	Income tax expense (benefit)—current	21a	240,000	240,000
	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
Other Comprehensive Income	23a	Foreign currency translation adjustments	23a		
	b	Other	23b		
	c	Income tax expense (benefit) related to other comprehensive income	23c		
	24	Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c)	24		

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	1		
2a	Trade notes and accounts receivable	2a		
b	Less allowance for bad debts	2b	( )	( )
3	Derivatives	3		
4	Inventories	4		
5	Other current assets (attach statement)	5		
6	Loans to shareholders and other related persons	6		
7	Investment in subsidiaries (attach statement)	7		
8	Other investments (attach statement)	8		
9a	Buildings and other depreciable assets	9a	1,000,000	1,000,000
b	Less accumulated depreciation	9b	( )	( )
10a	Depletable assets	10a		
b	Less accumulated depletion	10b	( )	( )
11	Land (net of any amortization)	11		
12	Intangible assets:			
a	Goodwill	12a		
b	Organization costs	12b		
c	Patents, trademarks, and other intangible assets	12c		
d	Less accumulated amortization for lines 12a, 12b, and 12c	12d	( )	( )
13	Other assets (attach statement)	13		
14	Total assets	14	1,000,000	1,000,000
	Liabilities and Shareholders' Equity			
15	Accounts payable	15		
16	Other current liabilities (attach statement)	16		
17	Derivatives	17		
18	Loans from shareholders and other related persons	18		
19	Other liabilities (attach statement)	19		
20	Capital stock:			
a	Preferred stock	20a		
b	Common stock	20b		
21	Paid-in or capital surplus (attach reconciliation)	21		
22	Retained earnings	22	1,000,000	1,000,000
23	Less cost of treasury stock	23	( )	( )
24	Total liabilities and shareholders' equity	24	1,000,000	1,000,000

DRAFT AS OF August 24, 2020 DO NOT FILE

Schedule G Other Information

		Yes	No
1	During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign 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 disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)? If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		✓
4a	During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)? If "Yes," complete lines 4b and 4c.		✓
b	Enter the total amount of the base erosion payments ▶ $		
c	Enter the total amount of the base erosion tax benefit ▶ $		
5a	During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? If "Yes," complete line 5b.		✓
b	Enter the total amount of the disallowed deductions (see instructions) ▶ $		

Schedule G Other Information *(continued)*

		Yes	No
6a	Is the filer of this Form 5471 claiming a foreign-derived intangible income deduction (under section 250) with respect to any amounts listed on Schedule M?		✓
	If "Yes," complete lines 6b, 6c, and 6d.		
b	Enter the amount of gross income derived from sales, leases, exchanges, or other dispositions (but not licenses) from transactions with the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) (see instructions) ▶ $		
c	Enter the amount of gross income derived from a license of property to the foreign corporation that the filer included in its computation of FDDEI (see instructions) ▶ $		
d	Enter the amount of gross income derived from services provided to the foreign corporation that the filer included in its computation of FDDEI (see instructions) ▶ $		
7	During the tax year, was the foreign corporation a participant in any cost-sharing arrangement?		✓
8	During the course of the tax year, did the foreign corporation become a participant in any cost-sharing arrangement?		✓
9	If the answer to question 7 is "Yes," was the foreign corporation a participant in a cost-sharing arrangement that was in effect before January 5, 2009?		
10	If the answer to question 7 is "Yes," did a U.S. taxpayer make any platform contributions as defined under Regulations section 1.482-7(c) to that cost-sharing arrangement during the taxable year?		
11	If the answer to question 10 is "Yes," enter the present value of the platform contributions in U.S. dollars ▶ $		
12	If the answer to question 10 is "Yes," check the box for the method under Regulations section 1.482-7(g) used to determine the price of the platform contribution transaction(s): ☐ Comparable uncontrolled transaction method ☐ Income method ☐ Acquisition price method ☐ Market capitalization method ☐ Residual profit split method ☐ Unspecified methods		
13	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 section 1.358-6(b)(2))?		✓
14a	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 taxable year?		✓
	If "Yes," go to line 14b.		
b	Enter the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for the taxable year ▶ $		
15	During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section 1.7874-12(a)(9)?		✓
	If "Yes," see instructions and attach statement.		
16	During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations section 1.6011-4?		✓
	If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		
17	During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		✓
18	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?		✓
19	Did you answer "Yes" to any of the questions in the instructions for line 19?		✓
	If "Yes," enter the corresponding code(s) from the instructions and attach statement ▶		
20	Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)?		✓
	If "Yes," enter the amount ▶ $		
21	Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to the current tax year (see instructions)?		✓
	If "Yes," enter the amount ▶ $		
22a	Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year (see instructions)?		
b	If the answer to question 22a 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)?		

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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	Section 964(e)(4) subpart F dividend income from the sale of stock of a lower-tier foreign corporation (see instructions)	1a	
b	Section 245A(e)(2) subpart F income from hybrid dividends of tiered corporations (see instructions)	1b	
c	Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c	160,000
d	Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d	
e	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	
c	Extraordinary reduction amounts (see instructions)	5c	
d	Section 245A(e) dividends (see instructions)	5d	
e	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 corporation 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 year $_____ and at the end of the tax year $ _____. Provide an attachment detailing any changes from the beginning to the ending balances.

c Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of the CFC year $_____ and at the end of the tax year $ _____. Provide an attachment detailing any changes from 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) $

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November 22, 2020

Tax Year 2020
1120 MeF ATS Scenario 3

SCHEDULE E (Form 5471)
(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

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

▶ Attach to Form 5471.
▶ Go to *www.irs.gov/Form5471* for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471		Identifying number
Anywork Finance Incorporated		00-0000003
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
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶

Part I Taxes for Which a Foreign Tax Credit Is Allowed

Section 1 — Taxes Paid or Accrued Directly by Foreign Corporation

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(d) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(e) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)
1	Foreign Finance Corporation	00-0000045	UK	2020/01/01	2020/12/31
2					
3					
4					

	(f) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(g) If taxes are paid on U.S. source income, check box	(n) Local Currency in Which Tax Is Payable (enter code — see instructions)	(i) Tax Paid or Accrued (in local currency in which the tax is payable)	(j) Conversion Rate to U.S. Dollars	(k) In U.S. Dollars (divide column (i) by column (j))	(l) In Functional Currency of Foreign Corporation
1	0	☐	GBP	7,969,922	0.6761	11,788,082	7,969,922
2		☐					
3		☐					
4		☐					
5	Total (combine lines 1 through 4 of column (k)). Also report amount on Schedule E-1, line 4 . . . . . ▶					11,788,082	
6	Total (combine lines 1 through 4 of column (l)) . . . . . ▶						7,969,922

Section 2 — Taxes Deemed Paid (Section 960(b))

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					

	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)
1				
2				
3				
4				
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 . . . . . ▶			

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Part II Election

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?

☐ Yes ☐ No If "Yes," state date of election ▶

Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901(m)	(f) U.S. Taxes	(g) Taxes Related to Section 959(c)(3) E&P	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2) ▶								
4	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

IMPORTANT: *Enter amounts in U.S. dollars unless otherwise noted (see instructions).*

		Taxes related to: (a) Current E&P	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance) (in functional currency)	(d) Hovering Deficit and Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1)	-0-			
b	Beginning balance adjustments (attach statement)				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination				
3a	Taxes unsuspended under anti-splitter rules				
b	Taxes suspended under anti-splitter rules				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (k)	11,788,082			
5a	Taxes carried over in nonrecognition transactions				
b	Taxes reclassified as related to hovering deficit after nonrecognition transaction				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i)				
7	Other adjustments (attach statement)				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)	11,788,082			
9	Taxes deemed paid with respect to inclusions under section 951(a)(1) (see instructions)				
10	Taxes deemed paid with respect to inclusions under section 951A (see instructions)				
11	Taxes deemed paid with respect to actual distributions				
12	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
13	Other (attach statement)				
14	Taxes related to hovering deficit offset of undistributed post-transaction E&P				
15	Balance of taxes paid or accrued (combine lines 8 through 14 in column (a))				
16	Reduction for tested income taxes not deemed paid				
17	Reduction for other taxes not deemed paid				
18	Balance of taxes paid or accrued at the beginning of the next year. Line 18, column (a), must always equal zero. So, if necessary, enter negative amounts on lines 16 and 17 of column (a) in amounts sufficient to reduce line 15, column (a), to zero. For the remaining columns, combine lines 8 through 14	-0-			

DRAFT AS OF August 25, 2020 DO NOT FILE

Schedule E-1 **Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation** *(continued)*

(e) Taxes related to previously 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										
c										
2										
3a										
b										
4										
5a										
b										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										

DRAFT AS OF
August 25, 2020
DO NOT FILE

November 22, 2020

Tax Year 2020
1120 MeF ATS Scenario 3

SCHEDULE E (Form 5471)
(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

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

▶ Attach to Form 5471.
▶ Go to *www.irs.gov/Form5471* for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471		Identifying number
Anywork Finance Incorporated		00-0000003
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
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶

Part I Taxes for Which a Foreign Tax Credit Is Allowed

Section 1 — Taxes Paid or Accrued Directly by Foreign Corporation

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(d) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(e) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)
1	Foreign Sands	00-0000046	NL	2020/01/01	2020/12/31
2					
3					
4					

	(f) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(g) If taxes are paid on U.S. source income, check box	(h) Local Currency in Which Tax Is Payable (enter code — see instructions)	(i) Tax Paid or Accrued (in local currency in which the tax is payable)	(j) Conversion Rate to U.S. Dollars	(k) In U.S. Dollars (divide column (i) by column (j))	(l) In Functional Currency of Foreign Corporation
1	1,000,000	☐	EUR	200,000	1.00000	200,000	200,000
2		☐					
3		☐					
4		☐					
5	Total (combine lines 1 through 4 of column (k)). Also report amount on Schedule E-1, line 4 . . . . . ▶					200,000	
6	Total (combine lines 1 through 4 of column (l)) . . . . . ▶						200,000

Section 2 — Taxes Deemed Paid (Section 960(b))

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					

	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)
1				
2				
3				
4				
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 . . . . . ▶			

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Part II Election

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?

☐ Yes ☐ No If "Yes," state date of election ▶

Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901(m)	(f) U.S. Taxes	(g) Taxes Related to Section 959(c)(3) E&P	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2) ▶								
4	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

IMPORTANT: *Enter amounts in U.S. dollars unless otherwise noted (see instructions).*

		Taxes related to: (a) Current E&P	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance) (in functional currency)	(d) Hovering Deficit and Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1)	-0-			
b	Beginning balance adjustments (attach statement)				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination				
3a	Taxes unsuspended under anti-splitter rules				
b	Taxes suspended under anti-splitter rules				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (k)	200,000			
5a	Taxes carried over in nonrecognition transactions				
b	Taxes reclassified as related to hovering deficit after nonrecognition transaction				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i)				
7	Other adjustments (attach statement)				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)				
9	Taxes deemed paid with respect to inclusions under section 951(a)(1) (see instructions)	140,000			
10	Taxes deemed paid with respect to inclusions under section 951A (see instructions)				
11	Taxes deemed paid with respect to actual distributions				
12	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
13	Other (attach statement)	60,000			
14	Taxes related to hovering deficit offset of undistributed post-transaction E&P				
15	Balance of taxes paid or accrued (combine lines 8 through 14 in column (a))				
16	Reduction for tested income taxes not deemed paid				
17	Reduction for other taxes not deemed paid				
18	Balance of taxes paid or accrued at the beginning of the next year. Line 18, column (a), must always equal zero. So, if necessary, enter negative amounts on lines 16 and 17 of column (a) in amounts sufficient to reduce line 15, column (a), to zero. For the remaining columns, combine lines 8 through 14	-0-			

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Schedule E-1 **Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation** *(continued)*

(e) Taxes related to previously 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										
c										
2										
3a										
b										
4										
5a										
b										
6										
7										
8										
9										
10	150,000	25,000								
11										
12										
13										
14	0	0								
15										
16										
17										
18										

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August 25, 2020
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SCHEDULE E (Form 5471)
(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

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

▶ Attach to Form 5471.
▶ Go to *www.irs.gov/Form5471* for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471		Identifying number
Anywork Finance Incorporated		00-0000003
Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
Foreign Sands	00-0000046	ABC8989

a Separate Category (Enter code—see instructions.) . . . . . ▶ PAS
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶

Part I Taxes for Which a Foreign Tax Credit Is Allowed

Section 1 — Taxes Paid or Accrued Directly by Foreign Corporation

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(d) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(e) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)
1	Foreign Sands	00-0000046	NL	2020/12/31	2020/12/31
2					
3					
4					

	(f) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(g) If taxes are paid on U.S. source income, check box	(h) Local Currency in Which Tax Is Payable (enter code — see instructions)	(i) Tax Paid or Accrued (in local currency in which the tax is payable)	(j) Conversion Rate to U.S. Dollars	(k) In U.S. Dollars (divide column (i) by column (j))	(l) In Functional Currency of Foreign Corporation
1	0	☐	EUR	40,000	1.00000	40,000	40,000
2		☐					
3		☐					
4		☐					
5	Total (combine lines 1 through 4 of column (k)). Also report amount on Schedule E-1, line 4 . . . . . ▶					40,000	
6	Total (combine lines 1 through 4 of column (l)) . . . . . ▶						40,000

Section 2 — Taxes Deemed Paid (Section 960(b))

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					

	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)
1				
2				
3				
4				
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 . . . . . ▶			

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Part II Election

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?

☐ Yes ☐ No If "Yes," state date of election ▶

Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901(m)	(f) U.S. Taxes	(g) Taxes Related to Section 959(c)(3) E&P	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2) ▶								
4	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

IMPORTANT: *Enter amounts in U.S. dollars unless otherwise noted (see instructions).*

		Taxes related to: (a) Current E&P	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance) (in functional currency)	(d) Hovering Deficit and Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1)	-0-			
b	Beginning balance adjustments (attach statement)				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination				
3a	Taxes unsuspended under anti-splitter rules				
b	Taxes suspended under anti-splitter rules				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (k)	40,000			
5a	Taxes carried over in nonrecognition transactions				
b	Taxes reclassified as related to hovering deficit after nonrecognition transaction				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i)				
7	Other adjustments (attach statement)				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)				
9	Taxes deemed paid with respect to inclusions under section 951(a)(1) (see instructions)	40,000			
10	Taxes deemed paid with respect to inclusions under section 951A (see instructions)				
11	Taxes deemed paid with respect to actual distributions				
12	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
13	Other (attach statement)				
14	Taxes related to hovering deficit offset of undistributed post-transaction E&P				
15	Balance of taxes paid or accrued (combine lines 8 through 14 in column (a))				
16	Reduction for tested income taxes not deemed paid				
17	Reduction for other taxes not deemed paid				
18	Balance of taxes paid or accrued at the beginning of the next year. Line 18, column (a), must always equal zero. So, if necessary, enter negative amounts on lines 16 and 17 of column (a) in amounts sufficient to reduce line 15, column (a), to zero. For the remaining columns, combine lines 8 through 14	-0-			

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Schedule E-1 **Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation** *(continued)*

(e) Taxes related to previously 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										
c										
2										
3a										
b										
4										
5a										
b										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										

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August 25, 2020
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November 22, 2020

Tax Year 2020
1120 MeF ATS Scenario 3

SCHEDULE H (Form 5471)
(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

Current Earnings and Profits

▶ Attach to Form 5471.
▶ Go to *www.irs.gov/Form5471* for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471		Identifying number
Anywork Finance Incorporated		00-0000003
Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
Foreign Finance Corporation	00-0000045	ABC1234

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IMPORTANT: *Enter the amounts on lines 1 through 5c in* ***functional*** *currency.*

			Net Additions	Net Subtractions		
1	Current year net income or (loss) per foreign books of account				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):					
a	Capital gains or losses	2a				
b	Depreciation and amortization	2b				
c	Depletion	2c				
d	Investment or incentive allowance	2d	355,647			
e	Charges to statutory reserves	2e				
f	Inventory adjustments	2f				
g	Income taxes (see Schedule E, Part I, Section 1, line 6, column (l), 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)				5a	29,524,354
b	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions)				5b	
c	Combine lines 5a and 5b and enter the result on line 5c. Then enter on lines 5c(i), 5c(ii), and 5c(iii)(A) through 5c(iii)(C) the portion of the line 5c amount with respect to the categories of income shown on those lines				5c	29,524,354
	(i) General category (enter amount on applicable Schedule J, Part I, line 3, column (a))	5c(i)		29,524,354		
	(ii) Passive category (enter amount on applicable Schedule J, Part I, 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 the sanctioned country on this line 5c(iii)(A) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(A)				
	(B) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(B) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(B)				
	(C) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(C) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(C)				
d	Current earnings and profits in U.S. dollars (line 5c translated at the average exchange rate, as defined in section 989(b)(3) and the related regulations (see instructions))				5d	43,668,620
e	Enter exchange rate used for line 5d ▶			0.6761		

SCHEDULE H (Form 5471)
(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

Current Earnings and Profits

▶ Attach to Form 5471.
▶ Go to *www.irs.gov/Form5471* for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471		Identifying number
Anywork Finance Incorporated		00-0000003
Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
Foreign Sands	00-0000046	

DRAFT AS OF August 24, 202
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IMPORTANT: *Enter the amounts on lines 1 through 5c in* ***functional*** *currency.*

1	Current year net income or (loss) per foreign books of account				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 Additions	Net Subtractions		
a	Capital gains or losses	2a				
b	Depreciation and amortization	2b				
c	Depletion	2c				
d	Investment or incentive allowance	2d				
e	Charges to statutory reserves	2e				
f	Inventory adjustments	2f				
g	Income taxes (see Schedule E, Part I, Section 1, line 6, column (l), 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 4)				5a	960,000
b	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions)				5b	
c	Combine lines 5a and 5b and enter the result on line 5c. Then enter on lines 5c(i), 5c(ii), and 5c(iii)(A) through 5c(iii)(C) the portion of the line 5c amount with respect to the categories of income shown on those lines				5c	960,000
	(i) General category (enter amount on applicable Schedule J, Part I, line 3, column (a))	5c(i)	800,000			
	(ii) Passive category (enter amount on applicable Schedule J, Part I, line 3, column (a))	5c(ii)	160,000			
	(iii) Section 901(j) category:					
	(A) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(A) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(A)				
	(B) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(B) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(B)				
	(C) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(C) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(C)				
d	Current earnings and profits in U.S. dollars (line 5c translated at the average exchange rate, as defined in section 989(b)(3) and the related regulations (see instructions))				5d	960,000
e	Enter exchange rate used for line 5d ▶			1.0000000		

SCHEDULE I-1 (Form 5471)

(Rev. December 2019)

Department of the Treasury
Internal Revenue Service

Information for Global Intangible Low-Taxed Income

▶ **Attach to Form 5471.**

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

OMB No. 1545-0704

Name of person filing Form 5471		Identifying number
Anywork Finance Incorporated		00-0000003
Name of foreign corporation	EIN (if any)	**Reference ID number** (see instructions)
Foreign Sands	00-0000046	

Separate Category (Enter code–see instructions.) . . . . . ▶ GEN

				Functional Currency	Conversion Rate	U.S. Dollars
1	Gross income		1	2,000,000		
2	Exclusions					
a	Effectively connected income	2a				
b	Subpart F income	2b				
c	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 (total of lines 2a–2e)		3	0		
4	Gross income less total exclusions (line 1 minus line 3)		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)		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				
c	Tested loss QBAI amount	9c				
d	Tested interest expense (line 9a minus the sum of line 9b and line 9c). If zero or less, enter -0-		9d			
10a	Interest income included in line 4	10a				
b	Qualified interest income	10b				
c	Tested interest income (line 10a minus line 10b). If zero or less, enter -0-		10c			

SCHEDULE J (Form 5471)
(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

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

▶ Attach to Form 5471.

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

OMB No. 1545-0123

Name of person filing Form 5471		Identifying number
Anywork Finance Incorporated		00-0000003
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

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶

Part I Accumulated E&P of Controlled Foreign Corporation

☐ Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).

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&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(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)			69,100,775			
b	Beginning balance adjustments (attach statement)						
c	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			

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Part I **Accumulated E&P of Controlled Foreign Corporation** *(continued)*

	(e) Previously Taxed E&P (see instructions)				
	(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
1a					
b					
c					
2a					
b					
3					
4					
5a					
b					
6					
7					
8					
9					
10					
11					
12					
13					
14					

	(e) Previously Taxed E&P (see instructions)			(f) Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))
	(viii) Section 951A PTEP	*(ix)* Section 245A(d) PTEP	*(x)* Section 951(a)(1)(A) PTEP	
1a				69,100,775
b				
c				69,100,775
2a				
b				
3				29,524,354
4				
5a				
b				
6				
7				98,625,129
8			29,524,354	
9				
10				
11				
12				
13				
14			29,524,354	98,625,129

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Part II **Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))**

Important: 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	

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August 24, 2020
DO NOT FILE

SCHEDULE J (Form 5471)

(Rev. December 2020)

Department of the Treasury
Internal Revenue Service

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

▶ Attach to Form 5471.

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

OMB No. 1545-0123

Name of person filing Form 5471		Identifying number
Anywork Finance Incorporated		00-0000003
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

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶

Part I Accumulated E&P of Controlled Foreign Corporation

☐ Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).

DRAFT AS OF August 24, 2020 DO NOT FILE

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&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(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)						
c	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	

Part I Accumulated E&P of Controlled Foreign Corporation *(continued)*

	(e) Previously Taxed E&P (see instructions)				
	(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
1a					500,000
b					
c					500,000
2a					
b					
3					
4					
5a					
b					
6					
7					500,000
8					
9					-500,000
10					
11					
12					
13					
14					0

	(e) Previously Taxed E&P (see instructions)			(f) Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))
	(viii) Section 951A PTEP	*(ix)* Section 245A(d) PTEP	*(x)* Section 951(a)(1)(A) PTEP	
1a				3,500,000
b				
c				3,500,000
2a				
b				
3				800,000
4				
5a				
b				
6				
7				4,300,000
8	700,000			
9				-3,500,000
10				
11				
12				
13				
14	700,000			800,000

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Part II **Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))**

Important: 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	

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August 24, 2020
DO NOT FILE

SCHEDULE J (Form 5471)

(Rev. December 2020)

Department of the Treasury
Internal Revenue Service

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

▶ Attach to Form 5471.

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

OMB No. 1545-0123

Name of person filing Form 5471		Identifying number
Anywork Finance Incorporated		00-0000003
Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
Foreign Sands	00-0000046	ABC8989

a Separate Category (Enter code—see instructions.) . . . . . ▶ PAS

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶

Part I Accumulated E&P of Controlled Foreign Corporation

☐ Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).

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&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(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)						
b	Beginning balance adjustments (attach statement)						
c	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					

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Part I Accumulated E&P of Controlled Foreign Corporation *(continued)*

	(e) Previously Taxed E&P (see instructions)				
	(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
1a					
b					
c					
2a					
b					
3					
4					
5a					
b					
6					
7					
8					
9					
10					
11					
12					
13					
14					

	(e) Previously Taxed E&P (see instructions)			(f) Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))
	(viii) Section 951A PTEP	*(ix)* Section 245A(d) PTEP	*(x)* Section 951(a)(1)(A) PTEP	
1a				
b				
c				
2a				
b				
3				160,000
4				
5a				
b				
6				
7				160,000
8			160,000	
9				
10				
11				
12				
13				
14			160,000	160,000

DRAFT AS OF August 24, 2020 DO NOT FILE

Part II **Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))**

Important: 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	

DRAFT AS OF
August 24, 2020
DO NOT FILE

SCHEDULE M (Form 5471)
(Rev. December 2018)
Department of the Treasury
Internal Revenue Service

Transactions Between Controlled Foreign Corporation and Shareholders or Other Related Persons

▶ Attach to Form 5471.
▶ Go to *www.irs.gov/Form5471* for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471		Identifying number
Anywork Finance, Incorporated		00-0000003
Name of foreign corporation	EIN (if any)	Reference ID number (see instructions)
Foreign Finance, Incorporated	00-0000045	ABC1234

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.*

Enter the relevant functional currency and the exchange rate used throughout this schedule ▶ British Pound .6761

	(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	(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
1	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	Add lines 1 through 12					
14	Purchases of stock in trade (inventory)					
15	Purchases of tangible property other than stock in trade					
16	Purchases of property rights (patents, trademarks, etc.)					
17	Platform contribution transaction payments paid					
18	Cost sharing transaction payments paid					
19	Compensation paid for technical, managerial, engineering, construction, or like services					
20	Commissions paid					
21	Rents, royalties, and license fees paid					
22	Hybrid dividends paid (see instructions)					
23	Dividends paid (exclude hybrid dividends paid)					
24	Interest paid					
25	Premiums paid for insurance or reinsurance					
26	Add lines 14 through 25					
27	Accounts Payable					
28	Amounts borrowed (enter the maximum loan balance during the year)—see instructions					
29	Accounts Receivable					
30	Amounts loaned (enter the maximum loan balance during the year)—see instructions	46,001,741				

SCHEDULE O (Form 5471)

(Rev. December 2012)

Department of the Treasury
Internal Revenue Service

Organization or Reorganization of Foreign Corporation, and Acquisitions and Dispositions of its Stock

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

OMB No. 1545-0704

Name of person filing Form 5471		Identifying number
Anywork Finance, Incorporated		00-0000003
Name of foreign corporation	**EIN (if any)**	**Reference ID number (see instructions)**
Foreign Finance Corporation	00-0000045	ABC1234

Important: *Complete a **separate** Schedule O for each foreign corporation for which information must be reported.*

Part I To Be Completed by U.S. Officers and Directors

(a) Name of shareholder for whom acquisition information is reported	(b) Address of shareholder	(c) Identifying number of shareholder	(d) Date of original 10% acquisition	(e) Date of additional 10% acquisition
Anywork Finance, Incorporated	35 Any St., Anytown, NY10006	00-0000003	01/10/1990	

Part II To Be Completed by U.S. Shareholders

Note: *If this return is required because one or more shareholders became U.S. persons, attach a list showing the names of such persons and the date each became a U.S. person.*

Section A—General Shareholder Information

(a) Name, address, and identifying number of shareholder(s) filing this schedule	(b) For shareholder's latest U.S. income tax return filed, indicate:			(c) Date (if any) shareholder last filed information return under section 6046 for the foreign corporation
	(1) Type of return (enter form number)	(2) Date return filed	(3) Internal Revenue Service Center where filed	
Anywork Finance, Incorporated	1120	09/15/2019	Ogden	

Section B—U.S. Persons Who Are Officers or Directors of the Foreign Corporation

(a) Name of U.S. officer or director	(b) Address	(c) Social security number	(d) Check appropriate box(es)	
			Officer	Director

Section C—Acquisition of Stock

(a) Name of shareholder(s) filing this schedule	(b) Class of stock acquired	(c) Date of acquisition	(d) Method of acquisition	(e) Number of shares acquired		
				(1) Directly	(2) Indirectly	(3) Constructively
Anywork Finance, Incorporated	Common	12/31/2019	Purchase	250		
Anywork Finance, Incorporated	Preferred	12/31/2019	Purchase	64,570		

(f) Amount paid or value given	(g) Name and address of person from whom shares were acquired
9,000,000	Mary Doe, 812 Maple Street, Somewhere, MD 20901

Section D—Disposition of Stock

(a) Name of shareholder disposing of stock	(b) Class of stock	(c) Date of disposition	(d) Method of disposition	(e) Number of shares disposed of		
				(1) Directly	(2) Indirectly	(3) Constructively

(f) Amount received	(g) Name and address of person to whom disposition of stock was made

Section E—Organization or Reorganization of Foreign Corporation

(a) Name and address of transferor	(b) Identifying number (if any)	(c) Date of transfer

(d) Assets transferred to foreign corporation			(e) Description of assets transferred by, or notes or securities issued by, foreign corporation
(1) Description of assets	(2) Fair market value	(3) Adjusted basis (if transferor was U.S. person)	

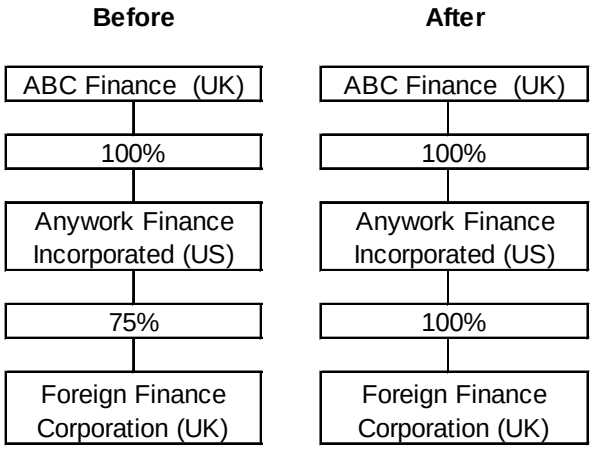
Section F—Additional Information

(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).

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



Tax Year 2020

November 22, 2020 1120 MeF ATS Scenario 3

Form **5472**

(Rev. December 2018)

Department of the Treasury
Internal Revenue Service

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.irs.gov/Form5472* for instructions and the latest information.**

For tax year of the reporting corporation beginning 01/01, 2020, and ending 12/31, 2020

Note: Enter all information in English and money items in U.S. dollars.

OMB No. 1545-0123

Part I Reporting Corporation (see instructions). All reporting corporations must complete Part I.

1a Name of reporting corporation: Anywork Finance Incorporated

1b Employer identification number: 00-0000003

Number, street, and room or suite no. (if a P.O. box, see instructions): 35 Any Street

1c Total assets: $ 250,306,361

City or town, state, and ZIP code (if a foreign address, see instructions): Anytown, NY 10006

1d Principal business activity ▶ International Finance

1e Principal business activity code ▶ 522293

1f Total value of gross payments made or received reported on **this** Form 5472. See instructions. $ 5,000

1g Total number of Forms 5472 filed for the tax year: 1

1h Total value of gross payments made or received reported on **all** Forms 5472. See instructions. $ 5,000

1i Check here if this is a consolidated filing of Form 5472 . . . . . ▶ ☐

1j Check here if this is the initial year for which the U.S. reporting corporation is filing a Form 5472 . . ▶ ☐

1k Country of incorporation: US

1l Country(ies) under whose laws the reporting corporation files an income tax return as a resident: US

1m Principal country(ies) where business is conducted: US

2 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 ▶ ☑

3 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). ▶ ☐

1a Name and address of direct 25% foreign shareholder: ABC Finance Corporation , 13 Somewhere, Birmingham, England 126375

1b(1) U.S. identifying number, if any: 00-0000021

1b(2) Reference ID number (see instructions):

1b(3) Foreign taxpayer identification number (FTIN), if any (see instructions):

1c Principal country(ies) where business is conducted: UK

1d Country of citizenship, organization, or incorporation: UK

1e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident: UK

2a Name and address of direct 25% foreign shareholder:

2b(1) U.S. identifying number, if any:

2b(2) Reference ID number (see instructions):

2b(3) FTIN, if any (see instructions):

2c Principal country(ies) where business is conducted:

2d Country of citizenship, organization, or incorporation:

2e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident:

3a Name and address of ultimate indirect 25% foreign shareholder:

3b(1) U.S. identifying number, if any:

3b(2) Reference ID number (see instructions):

3b(3) FTIN, if any (see instructions):

3c Principal country(ies) where business is conducted:

3d Country of citizenship, organization, or incorporation:

3e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident:

4a Name and address of ultimate indirect 25% foreign shareholder:

4b(1) U.S. identifying number, if any:

4b(2) Reference ID number (see instructions):

4b(3) FTIN, if any (see instructions):

4c Principal country(ies) where business is conducted:

4d Country of citizenship, organization, or incorporation:

4e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident:

Part III **Related Party** (see instructions). All reporting corporations must complete this question and the rest of Part III.
Check applicable box: Is the related party a ☑ foreign person or ☐ U.S. person?

1a Name and address of related party

ABC Finance 13 Somewhere, Birmingham, England 126375

1b(1) U.S. identifying number, if any	**1b(2)** Reference ID number (see instructions)	**1b(3)** FTIN, if any (see instructions)
00-0000021		

1c Principal business activity ▶ International Finance **1d** Principal business activity code ▶ 522293

1e Relationship—Check boxes that apply: ☐ Related to reporting corporation ☐ Related to 25% foreign shareholder ☑ 25% foreign shareholder

1f Principal country(ies) where business is conducted	**1g** Country(ies) under whose laws the related party files an income tax return as a resident
UK	UK

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. ▶ ☐

1	Sales of stock in trade (inventory)	1	
2	Sales of tangible property other than stock in trade	2	
3	Platform contribution transaction payments received	3	
4	Cost-sharing transaction payments received	4	
5a	Rents received (for other than intangible property rights)	5a	
b	Royalties received (for other than intangible property rights)	5b	
6	Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	6	
7	Consideration received for technical, managerial, engineering, construction, scientific, or like services	7	
8	Commissions received	8	
9	Amounts borrowed (see instructions) **a** Beginning balance _____ **b** Ending balance or monthly average ▶	9b	
10	Interest received	10	
11	Premiums received for insurance or reinsurance	11	
12	Other amounts received (see instructions)	12	
13	**Total.** Combine amounts on lines 1 through 12	13	
14	Purchases of stock in trade (inventory)	14	
15	Purchases of tangible property other than stock in trade	15	
16	Platform contribution transaction payments paid	16	
17	Cost-sharing transaction payments paid	17	
18a	Rents paid (for other than intangible property rights)	18a	
b	Royalties paid (for other than intangible property rights)	18b	
19	Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	19	
20	Consideration paid for technical, managerial, engineering, construction, scientific, or like services	20	
21	Commissions paid	21	
22	Amounts loaned (see instructions) **a** Beginning balance 5,000 **b** Ending balance or monthly average ▶	22b	5,000
23	Interest paid	23	
24	Premiums paid for insurance or reinsurance	24	
25	Other amounts paid (see instructions)	25	
26	**Total.** Combine amounts on lines 14 through 25	26	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. ▶ ☐

Part VII Additional Information. All reporting corporations must complete Part VII.

1	Does the reporting corporation import goods from a foreign related party?	☐ Yes ☑ No
2a	If "Yes," is the basis or inventory cost of the goods valued at greater than the customs value of the imported goods?	☐ Yes ☐ No
b	If "Yes," attach a statement explaining the reason or reasons for such difference.	
c	If the answers to questions 1 and 2a 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
3	During the tax year, was the foreign parent corporation a participant in any cost-sharing arrangement?	☐ Yes ☑ No
4	During the course of the tax year, did the foreign parent corporation become a participant in any cost-sharing arrangement?	☐ Yes ☑ No
5a	During the tax year, did the reporting corporation pay or accrue any interest or royalty, to the related party, for which the deduction is not allowed under section 267A? See instructions	☐ Yes ☑ No
b	If "Yes," enter the total amount of the disallowed deductions	$
6a	Does the reporting corporation claim a foreign-derived intangible income (FDII) deduction (under section 250) with respect to amounts listed in Part IV?	☐ Yes ☑ No
b	If "Yes," enter the amount of gross income derived from sales, leases, exchanges, or other dispositions (but not licenses) of property to the foreign related party that the reporting corporation included in its computation of foreign-derived deduction eligible income (FDDEI). See instructions	$
c	If "Yes," enter the amount of gross income derived from a license of property to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions.	$
d	If "Yes," enter the amount of gross income derived from services provided to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions	$

Part VIII Base Erosion Payments and Base Erosion Tax Benefits Under Section 59A (see instructions)

1	Amounts defined as base erosion payments under section 59A(d)	$
2	Amount of base erosion tax benefits under section 59A(c)(2)	$
3	Amount of total qualified derivative payments as described in section 59A(h) made by the reporting corporation	$
4	Reserved for future use	☐

Form **8832**

(Rev. December 2013)

Department of the Treasury
Internal Revenue Service

Entity Classification Election

OMB No. 1545-1516

▶ **Information about Form 8832 and its instructions is at *www.irs.gov/form8832*.**

Type or Print	Name of eligible entity making election	Employer identification number
	DEF International Finance	00-0000017
	Number, street, and room or suite no. If a P.O. box, see instructions.	
	1000 Helmstraat	
	City or town, state, and ZIP code. If a foreign address, enter city, province or state, postal code and country. Follow the country's practice for entering the postal code.	
	Maastricht, Limburg, Netherlands 6211TA	

▶ Check if: ☐ Address change ☐ Late classification relief sought under Revenue Procedure 2009-41
☐ Relief for a late change of entity classification election sought under Revenue Procedure 2010-32

Part I Election Information

1 **Type of election** (see instructions):

a ☑ Initial classification 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 eligible entity previously filed an entity election that had an effective date within the last 60 months?

☐ **Yes.** Go to line 2b.
☐ **No.** Skip line 2b and go to line 3.

2b Was the eligible entity's prior election an initial classification election by a newly formed entity that was effective on the date of formation?

☐ **Yes.** Go to line 3.
☐ **No.** Stop here. You generally are not currently eligible to make the election (see instructions).

3 Does the eligible entity have more than one owner?

☐ **Yes.** You can elect to be classified as a partnership or an association taxable as a corporation. Skip line 4 and go to line 5.
☑ **No.** You can elect to be classified as an association taxable as a corporation or to be disregarded as a separate entity. Go to line 4.

4 If the eligible entity has only one owner, provide the following information:

a Name of owner ▶ Anywork Finance Incorporated
b Identifying number of owner ▶ 00-0000003

5 If the eligible entity is owned by one or more affiliated corporations that file a consolidated return, provide the name and employer identification number of the parent corporation:

a Name of parent corporation ▶
b Employer identification number ▶

Part I **Election Information** (Continued)

6 **Type of entity** (see instructions):

- **a** ☐ A domestic eligible entity electing to be classified as an association taxable as a corporation.
- **b** ☐ A domestic eligible entity electing to be classified as a partnership.
- **c** ☐ 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.
- **e** ☐ 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 separate entity.

7 If the eligible entity is created or organized in a foreign jurisdiction, provide the foreign country of organization ▶ Netherlands

8 Election is to be effective beginning (month, day, year) (see instructions) . . . . . ▶ 12/31/2019

9 Name and title of contact person whom the IRS may call for more information

Sam Brown, Tax Administrator

10 Contact person's telephone number

515-555-5550

Consent Statement and Signature(s) (see instructions)

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

Tax Year 2020
November 22, 2020 1120 MeF ATS Scenario 3

Form **8858**

(Rev. September 2020)

Department of the Treasury
Internal Revenue Service

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)
beginning 01/01 , 20 20 , and ending 12/31 , 20 20

OMB No. 1545-1910

Attachment Sequence No. **140**

Name of person filing this return: Anywork Finance Incorporated

Filer's identifying number: 00-0000003

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address): 35 Any Street

City or town, state, and ZIP code: Anytown, NY 10006

Filer's tax year beginning , 20 , and ending , 20

DRAFT AS OF July 31, 2020 DO NOT FILE

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.*

Check here ☐ FDE of a U.S. person ☐ FDE of a controlled foreign corporation (CFC) ☐ FDE of a controlled foreign partnership
☑ FB of a U.S. person ☐ FB of a CFC ☐ FB of a controlled foreign partnership

Check here ☑ Initial 8858 ☐ Final 8858

1a Name and address of FDE or FB
DEF International Finance
1000 Helmstraat
Maastricht, Limburg/Netherlands 6211TA

b(1) U.S. identifying number, if any: 00-0000017

b(2) Reference ID number (see instructions)

c For FDE, country(ies) under whose laws organized and entity type under local tax law: Netherlands Foreign Entity

d Date(s) of organization: 12/30/2020

e Effective date as FDE: 12/31/2020

f If benefits under a U.S. tax treaty were claimed with respect to income of the FDE or FB, enter the treaty and article number

g Country in which principal business activity is conducted

h Principal business activity

i Functional currency

2 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 the United States

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 such books and records, if different

3 For the **tax owner** of the FDE or FB (if different from the filer), provide the following (see instructions):

a Name and address
ABCDEF Finance Corporation
14 Somewhere
Birmingham, England 126375

b Annual accounting period covered by the return (see instructions)

c(1) U.S. identifying number, if any: 00-0000022

c(2) Reference ID number (see instructions)

d Country under whose laws organized

e Functional currency

4 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

5 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.

DRAFT AS OF July 31, 2020 DO NOT FILE

Schedule C Income Statement (see instructions)

Important: *Report all information in functional currency in accordance with U.S. GAAP. Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules or the average exchange rate determined under section 989(b)). If the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for FDEs or FBs that use DASTM.*

If you are using the average exchange rate (determined under section 989(b)), check the following box . . . . . ☐

			Functional Currency	U.S. Dollar
1	Gross receipts or sales (net of returns and allowances)	1		
2	Cost of goods sold	2		
3	Gross profit (subtract line 2 from line 1)	3		
4	Dividends	4		
5	Interest	5		
6	Gross rents, royalties, and license fees	6		
7	Gross income from performance of services	7		
8	Foreign currency gain (loss)	8		
9	Other income	9		
10	Total income (add lines 3 through 9)	10		
11	Total deductions (exclude income tax expense)	11		
12	Income tax expense	12		
13	Other adjustments	13		
14	Net income (loss) per books	14		

Schedule 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	(b) Amount stated in functional currency of recipient
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 statement)	3		

		Yes	No
4	Were all remittances from the FDE or FB treated as made to the direct owner?	✓	
5	Did the tax owner change its method of accounting for section 987 gain or loss with respect to remittances from the FDE or FB during the tax year? If "Yes," attach a statement describing the method used prior to the change and new method of accounting		✓

Schedule F Balance Sheet

Important: *Report all amounts in U.S. dollars computed in functional currency and translated into U.S. dollars in accordance with U.S. GAAP. See instructions for an exception for FDEs or FBs that use DASTM.*

	Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1	Cash and other current assets	1		
2	Other assets	2		
3	Total assets	3		
	Liabilities and Owner's Equity			
4	Liabilities	4		
5	Owner's equity	5		
6	Total liabilities and owner's equity	6		

Schedule G Other Information

		Yes	No
1	During the tax year, did the FDE or FB own an interest in any trust?		✓
2	During the tax year, did the FDE or FB own at least a 10% interest, directly or indirectly, in any foreign partnership?		✓
3	*Answer the following question 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?		
4	During the tax year, did the FDE or FB pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		✓
5	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?		✓

Schedule G **Other Information** *(continued)*

DRAFT AS OF JULY 31, 2020 DO NOT FILE

		Yes	No
6a	During the tax year, did the FDE or FB receive, or accrue the receipt of, any amounts defined as a 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 6b and 6c		✓
b	Enter the total amount of the base erosion payments $		
c	Enter the total amount of the base erosion tax benefit $		
7a	During the tax year, did the FDE or FB pay, or accrue the payment of, any amounts defined as a base 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 7b and 7c		✓
b	Enter the total amount of the base erosion payments $		
c	Enter the total amount of the base erosion tax benefit $		
8	Is the FDE or FB a qualified business unit as defined in section 989(a)?		✓
9	*Answer the following question 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?		
10a	*Answer the remaining questions in Schedule G only if the tax owner of the FB or the interest in the FDE is a U.S. corporation:* If the FB or the interest in the FDE is a separate unit under Regulations section 1.1503(d)-1(b)(4), and is not 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)?		✓
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 as defined in Regulations section 1.1503(d)-1(b)(5)(ii)? If "Yes," complete lines 11b and 11c		✓
b	Enter the amount of the dual consolidated loss for the combined separate unit ► $( )		
c	Enter the net income (loss) attributed to the individual FB or the individual interest in the FDE as determined under Regulations section 1.1503(d)-5(c)(4)(ii)(A) ► $		
12a	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? If "Yes," see the instructions and go to line 12c. If "No," go to line 12d		
c	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		
e	Enter the separate unit's contribution to the cumulative consolidated taxable income ("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 as part of a combined separate unit, in any prior tax years?		✓
b	If "Yes," enter the total amount of recapture ► $. See instructions.		

DRAFT AS OF July 31, 2020 DO NOT FILE

Schedule H Current Earnings and Profits or Taxable Income (see instructions)

Important: *Enter the amounts on lines 1 through 6 in functional currency.*

1	Current year net income (loss) per foreign books of account	1	
2	Total net additions	2	
3	Total net subtractions	3	
4	Current earnings and profits (or taxable income—see instructions) (line 1 plus line 2 minus line 3)	4	
5	DASTM gain (loss) (if applicable)	5	
6	Combine lines 4 and 5	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 ▶		

Schedule I Transferred Loss Amount (see instructions)

Important: *See instructions for who has to complete this section.*

		Yes	No
1	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		✓
2	Was the transferor a domestic corporation that transferred substantially all of the assets of an FB (including an FB that is an FDE) to a specified 10%-owned foreign corporation? If "No," stop here. If "Yes," go to line 3		
3	Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? If "No," stop here. If "Yes," go to line 4		
4	Enter the transferred loss amount included in gross income as required under section 91. See instructions	4	

Schedule J Income Taxes Paid or Accrued (see instructions)

	Foreign Income Taxes			Foreign Tax Credit Separate Categories			
(a) Country or Possession	(b) Foreign Currency	(c) Conversion Rate	(d) U.S. Dollars	(e) Foreign Branch	(f) Passive	(g) General	(h) Other
Totals							

Tax Year 2020
November 22, 2020 1120 MeF ATS Scenario 3

Form **8858**

(Rev. September 2020)

Department of the Treasury
Internal Revenue Service

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)
beginning 01/01 , 20 20 , and ending 12/31 , 20 20

OMB No. 1545-1910

Attachment Sequence No. **140**

Name of person filing this return: Anywork Finance Incorporated

Filer's identifying number: 00-0000003

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address): 35 Any Street

City or town, state, and ZIP code: Anytown, NY 10006

Filer's tax year beginning , 20 , and ending , 20

DRAFT AS OF July 31, 2020 DO NOT FILE

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.*

Check here ☐ FDE of a U.S. person ☐ FDE of a controlled foreign corporation (CFC) ☐ FDE of a controlled foreign partnership
☑ FB of a U.S. person ☐ FB of a CFC ☐ FB of a controlled foreign partnership

Check here ☑ Initial 8858 ☐ Final 8858

1a Name and address of FDE or FB:
GHI International Finance
2000 Helmstraat
Maastricht, Limburg/Netherlands 6211TA

b(1) U.S. identifying number, if any: 00-0000018

b(2) Reference ID number (see instructions):

c For FDE, country(ies) under whose laws organized and entity type under local tax law: Netherlands Foreign Entity

d Date(s) of organization: 12/30/2020

e Effective date as FDE: 12/31/2020

f If benefits under a U.S. tax treaty were claimed with respect to income of the FDE or FB, enter the treaty and article number:

g Country in which principal business activity is conducted:

h Principal business activity:

i Functional currency:

2 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 the United States:

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 such books and records, if different:

3 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):

c(1) U.S. identifying number, if any:

c(2) Reference ID number (see instructions):

d Country under whose laws organized:

e Functional currency:

4 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:

5 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.

DRAFT AS OF July 31, 2020 DO NOT FILE

Schedule C Income Statement (see instructions)

Important: *Report all information in functional currency in accordance with U.S. GAAP. Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules or the average exchange rate determined under section 989(b)). If the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for FDEs or FBs that use DASTM.*

If you are using the average exchange rate (determined under section 989(b)), check the following box . . . . . ☐

			Functional Currency	U.S. Dollar
1	Gross receipts or sales (net of returns and allowances)	1	1,000,000	1,000,000
2	Cost of goods sold	2	800,000	800,000
3	Gross profit (subtract line 2 from line 1)	3	200,000	200,000
4	Dividends	4		
5	Interest	5		
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

Schedule 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	(b) Amount stated in functional currency of recipient
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 statement)	3		

		Yes	No
4	Were all remittances from the FDE or FB treated as made to the direct owner?	✓	
5	Did the tax owner change its method of accounting for section 987 gain or loss with respect to remittances from the FDE or FB during the tax year? If "Yes," attach a statement describing the method used prior to the change and new method of accounting		✓

Schedule F Balance Sheet

Important: *Report all amounts in U.S. dollars computed in functional currency and translated into U.S. dollars in accordance with U.S. GAAP. See instructions for an exception for FDEs or FBs that use DASTM.*

	Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1	Cash and other current assets	1		
2	Other assets	2		
3	Total assets	3		
	Liabilities and Owner's Equity			
4	Liabilities	4		
5	Owner's equity	5		
6	Total liabilities and owner's equity	6		

Schedule G Other Information

		Yes	No
1	During the tax year, did the FDE or FB own an interest in any trust?		✓
2	During the tax year, did the FDE or FB own at least a 10% interest, directly or indirectly, in any foreign partnership?		✓
3	*Answer the following question 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?		
4	During the tax year, did the FDE or FB pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		✓
5	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?		✓

Schedule G **Other Information** *(continued)*

DRAFT AS OF JULY 31, 2020 DO NOT FILE

		Yes	No
6a	During the tax year, did the FDE or FB receive, or accrue the receipt of, any amounts defined as a 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 6b and 6c		✓
b	Enter the total amount of the base erosion payments $		
c	Enter the total amount of the base erosion tax benefit $		
7a	During the tax year, did the FDE or FB pay, or accrue the payment of, any amounts defined as a base 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 7b and 7c		✓
b	Enter the total amount of the base erosion payments $		
c	Enter the total amount of the base erosion tax benefit $		
8	Is the FDE or FB a qualified business unit as defined in section 989(a)?		✓
9	*Answer the following question 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?		
10a	*Answer the remaining questions in Schedule G only if the tax owner of the FB or the interest in the FDE is a U.S. corporation:* If the FB or the interest in the FDE is a separate unit under Regulations section 1.1503(d)-1(b)(4), and is not 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)?		✓
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 as defined in Regulations section 1.1503(d)-1(b)(5)(ii)? If "Yes," complete lines 11b and 11c		✓
b	Enter the amount of the dual consolidated loss for the combined separate unit ► $( )		
c	Enter the net income (loss) attributed to the individual FB or the individual interest in the FDE as determined under Regulations section 1.1503(d)-5(c)(4)(ii)(A) ► $		
12a	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? If "Yes," see the instructions and go to line 12c. If "No," go to line 12d		
c	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		
e	Enter the separate unit's contribution to the cumulative consolidated taxable income ("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 as part of a combined separate unit, in any prior tax years?		✓
b	If "Yes," enter the total amount of recapture ► $. See instructions.		

DRAFT AS OF July 31, 2020 DO NOT FILE

Schedule H Current Earnings and Profits or Taxable Income (see instructions)

Important: *Enter the amounts on lines 1 through 6 in functional currency.*

1	Current year net income (loss) per foreign books of account	1	80,000
2	Total net additions	2	
3	Total net subtractions	3	
4	Current earnings and profits (or taxable income—see instructions) (line 1 plus line 2 minus line 3)	4	
5	DASTM gain (loss) (if applicable)	5	
6	Combine lines 4 and 5	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	80,000
8	Enter exchange rate used for line 7 ▶		

Schedule I Transferred Loss Amount (see instructions)

Important: *See instructions for who has to complete this section.*

		Yes	No
1	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		
2	Was the transferor a domestic corporation that transferred substantially all of the assets of an FB (including an FB that is an FDE) to a specified 10%-owned foreign corporation? If "No," stop here. If "Yes," go to line 3		
3	Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? If "No," stop here. If "Yes," go to line 4		
4	Enter the transferred loss amount included in gross income as required under section 91. See instructions	4	

Schedule J Income Taxes Paid or Accrued (see instructions)

	Foreign Income Taxes			Foreign Tax Credit Separate Categories			
(a) Country or Possession	(b) Foreign Currency	(c) Conversion Rate	(d) U.S. Dollars	(e) Foreign Branch	(f) Passive	(g) General	(h) Other
NL				20,000			
Totals							

Form **8992**
(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

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

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

OMB No. 1545-0123

Attachment Sequence No. **992**

Name of person filing this return	A Identifying number
Anywork Finance Incorporated	00-0000003
Name of U.S. shareholder	B Identifying number

DRAFT AS OF August 27, 2020 DO NOT FILE

Part I Net Controlled Foreign Corporation (CFC) Tested Income

1	Sum of Pro Rata Share of Net Tested Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Form 8992, Schedule A, 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.	1	800,000
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 Form 8992, Schedule A, 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.	2	( )
3	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)

1	Net CFC Tested Income. Enter amount from Part I, line 3		1	800,000
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 Form 8992, Schedule A, 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.		2	100,000
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 Form 8992, Schedule A, line 1, column (j). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3a blank.	3a		
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 Form 8992, Schedule A, line 1, column (i). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3b blank.	3b		
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.		3c	0
4	Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0-		4	100,000
5	GILTI. Subtract line 4 from line 1		5	700,000

Schedule A **Schedule A for U.S. Shareholder Calculation of Global Intangible Low-Taxed Income (GILTI)**

Name of person filing this form	A Identifying number
Anywork Finance Incorporated	00-0000003
Name of U.S. shareholder	B Identifying number

DRAFT AS OF August 27, 2020 DO NOT FILE

(a) Name of CFC	(b) EIN or Reference ID	Calculations for Net Tested Income (see instructions) (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	GILTI Allocated to Tested Income CFCs (see instructions) (k) GILTI Allocation Ratio (Divide Col. (e) by Col. (e), Line 1 Total)	(l) 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
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
1. Totals (see instructions) . .		800,000	( )	800,000	( )	1,000,000	( )			1.0000	700,000

Totals on line 1 should include the totals from any continuation sheets.

Schedule A—Continuation Sheet. *Use only if you need additional space.*

Name of person filing this form	A Identifying number
Anywork Finance Incorporated	00-0000003
Name of U.S. shareholder	B Identifying number

DRAFT AS OF
August 27, 2020
DO NOT FILE

(a) Name of CFC	(b) EIN or Reference ID	Calculations for Net Tested Income (see instructions)								GILTI Allocated to Tested Income CFCs (see instructions)	
		(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)	(l) GILTI Allocated to Tested Income CFCs (Multiply Form 8992, Part II, Line 5, by Col. (k))
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
1. Totals (see instructions) . .			( )		( )		( )				

Totals of columns (c) through (l) should be included on line 1 *Totals* on page 2.

Schedule A—Continuation Sheet. *Use only if you need additional space.*

Name of person filing this form	A Identifying number
Anywork Finance Incorporated	00-0000003
Name of U.S. shareholder	B Identifying number

DRAFT AS OF August 27, 2020 DO NOT FILE

(a) Name of CFC	(b) EIN or Reference ID	Calculations for Net Tested Income (see instructions)								GILTI Allocated to Tested Income CFCs (see instructions)	
		(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)	(l) GILTI Allocated to Tested Income CFCs (Multiply Form 8992, Part II, Line 5, by Col. (k))
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
			( )		( )		( )				
1. Totals (see instructions) . .			( )		( )		( )				

Totals of columns (c) through (l) should be included on line 1 *Totals* on page 2.

Tax Year 2020
November 22, 2020 1120 MeF ATS Scenario 3

Form **8993** (Rev. January 2020) Department of the Treasury Internal Revenue Service

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

Attachment Sequence No. **933**

Name of person filing this return: Anywork Finance Incorporated

Identifying number: 00-0000003

Part I Determining Deduction Eligible Income (DEI) (see instructions)

1	Gross Income			1	
2	Exclusions				
a	Income included under section 951(a)(1) (see instructions)	2a			
b	Income included under section 951A (see instructions)	2b			
c	Financial Services Income	2c			
d	CFC Dividends (see instructions)	2d			
e	Domestic Oil and Gas Extraction Income	2e			
f	Foreign Branch Income	2f			
3	Total Exclusions (add lines 2a through 2f)			3	
4	Gross Income less Total Exclusions (subtract line 3 from line 1)			4	
5	Deductions properly allocable to the amount on line 4			5	
6	Deduction Eligible Income (DEI) (subtract line 5 from line 4)			6	

Part II Determining Deemed Intangible Income (DII) (see instructions)

1	DEI (from Part I, line 6, above)	1	
2	Deemed Tangible Income Return (10% of QBAI)	2	
3	Deemed Intangible Income (DII) (subtract line 2 from line 1)	3	

Part III Determining Foreign Derived Ratio (see instructions)

1a	DEI derived from sales, leases, exchanges, or other dispositions (but not licenses) of property to a foreign person for a foreign use (see instructions)	1a			
b	DEI derived from a license of property to a foreign person for a foreign use (see instructions)	1b			
c	DEI derived from services provided to a person or with respect to property located outside of the United States (see instructions)	1c			
2	Foreign Derived Deduction Eligible Income (FDDEI) (add lines 1a through 1c)			2	
3	Deduction Eligible Income (DEI) (from Part I, line 6, above)			3	
4	Foreign Derived Ratio (FDDEI/DEI) (divide line 2 by line 3)			4	

Part IV Determining FDII and/or GILTI Deduction (see instructions)

1	Deemed Intangible Income (DII) (from Part II, line 3)	1	
2	Foreign Derived Ratio (from Part III, line 4)	2	
3a	FDII (multiply line 1 by line 2)	3a	
b	Global Intangible Low-Taxed Income (GILTI) Inclusion (see instructions for line 3b)	3b	700,000
c	Total FDII and GILTI (add lines 3a and 3b)	3c	700,000
4	Taxable Income (see instructions for line 4)	4	1,054,613
5	Excess FDII and GILTI over Taxable Income (subtract line 4 from line 3c). If zero or less, enter -0- here and on lines 6 and 7	5	0
6	FDII Reduction (divide line 3a by line 3c; multiply by line 5)	6	
7	GILTI Reduction (subtract line 6 from line 5)	7	
8	FDII Deduction (see instructions for line 8). (Enter here and on Form 1120, Schedule C; see instructions for information on other tax forms)	8	
9	GILTI Deduction (see instructions for line 9). (Enter here and on Form 1120, Schedule C; see instructions for information on other tax forms)	9	437,500