September 13, 2022

Anywork Finance Incorporated

00-000003

FORM 1120 TEST SCENARIO 3

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

ATTACHMENTS:

ItemizedOtherDeductionsSchedule
ItemizedOtherCurrentAssetsSchedule
ItemizedOtherInvestmentSchedule
ItemizedOtherInvestmentsSchedule
NonincludibleForeignEntitySchedule
OtherIncomeLossItemsWithDifferencesSchedule

Other Expense Deduction I tems With Differences Schedule

OtherReductionOfTaxesSchedule

Category3FilerStatement

ItemizedOtherDeductionsSchedule2 ItemizedOtherCurrentAssetsSchedule ItemizedOtherCurrentLiabilitesSchedule ItemizedOtherLiabilitiesSchedule

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

Date signed: 02/15/2022

Preparer Name: Johnny Appleseed

Date Prepared: 02/15/2022

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

September 13, 2022 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*

September 13, 20 1120 | _

Tax Year 2022

022		1120 MeF AT	S Scenari	io 3	
	U.S.	Corporation	Income	Tax	Return

			ne Treasury e Service	Cale				-		ons and the I					2021
	Check		GOELVICE	Ì	Name		. e.get/i						-	ployer id	dentification number
		idated	054)		Anywor	k Finance	Incorpo	rated						00-	-0000003
,			TYPE Number, street, and room or suite no. If a P.O. box, see instructions.							incorpo	prated				
d	lated r	d return OR						,						-01-1985	
		al hold Sch. F		11			r province.	country, and	ZIP or foreig	n postal code			D Tota		(see instructions)
3 P	ersona	al servic	ce corp.			n, NY 100		,						\$	
•		truction le M-3 a		heck		Initial ret		(2) Fi	nal return	(3)	Name ch	ange	(4)		s change
	18		ross receipts or s								1a		000,000		
			eturns and allowa								1b			1	
			alance. Subtract			line 1a								1c	1,000,000
	2	C	ost of goods sold	d (att	tach For	n 1125-A)	. I			. 6				2	
	3		ross profit. Subt						3 K					3	1,000,000
9	4		ividends and incl					J. J. J.						4	44,743,620
Income	5		terest											5	
<u>u</u>	6	G	ross rents											6	
	7	G	ross royalties											7	
	8	C	apital gain net ind	com	e (attach	Schedule	D (Form	1120)) .	.					8	
	9	N	et gain or (loss) f	om	Form 47	97, Part II,	line 17 (a	attach Form	1 4797) .					9	
	10	0	ther income (see	inst	ructions	-attach st	atement)							10	100,000
	11	To	otal income. Ad	d lin	es 3 thro	ough 10							. ▶	11	45,843,620
·	12	C	ompensation of o	office	ers (see i	nstruction	s-attach	Form 112	5-E)				. ▶	12	
ons	13	Sa	alaries and wages	s (les	ss emplo	yment cred	dits) .							13	200,000
JCti	14	Re	epairs and mainte	enar	nce .									14	
edt	15	Ва	ad debts											15	
p u	16	Re	ents											16	
ls o	17	Ta	axes and licenses	3.										17	
tior	18	In	terest (see instru	ctior	ns) .									18	
(See instructions for limitations on deductions.)	19	CI	haritable contribu	ution	ıs									19	
≟	20	De	epreciation from	Forr	n 4562 r	ot claimed	on Form	1125-A or	elsewhere of	on return (atta	ach Forn	n 4562) .		20	
ξ	21	D	epletion											21	
suc	22	Ad	dvertising											22	
icti	23	Pe	ension, profit-sha	aring	, etc., pl	ans .								23	
stru	24	Er	mployee benefit រុ	orog	rams									24	
Ë	25	Re	eserved for future	e use	э									25	
See	26		ther deductions (,								26	120,387
	27		otal deductions.			_							. ▶	27	320,387
Deductions	28		axable income be			0					1 1	from line 1	1	28	45,523,233
que	298		et operating loss		`		,				29a			_	
De			pecial deductions	`		. ,					29b		106,120	_	44404460
			dd lines 29a and											29c	44,106,120
and	30		axable income.											30	1,417,113
Tax, Refundable Credits, and Payments	31		otal tax (Schedul			,								31	168,000
Crec	32		eserved for future											32	16 670 102
ndable Cre Payments	33		otal payments an		`			,						33	16,678,103
funda	34				See instructions. Check if Form 2220 is attached							34			
, Ref	35 36			unt owed. If line 33 is smaller than the total of lines 31 and 34, enter amount owed							35 36	16,510,103			
Тах	37		nter amount from							amount overp	aiu .	Refund	lod 🕨	37	16,510,103
	31									hedules and state	ements, an			1	nd belief, it is true, correct,
Sig	gn	an	d complete. Declaration	on of p	preparer (ot	her than taxpa	ayer) is base	d on all informa	ation of which p	reparer has any k	nowledge.		Ma	av the IRS	S discuss this return
He	- 1	k							k	Chief Execu	tive Offi	icer	wi	th the pre	eparer shown below?
	. 0	Sign	gnature of officer					Date		Title			Se	e instruc	tions. Ves No
_	P		Print/Type prepar	er's r	name		Prepa	arer's signatu	ire		Date				PTIN
Pa													Check self-en	if if	P00000002
	epa		Firm's name	EI	 lectronic	Tax Filer	s, Inc.				1	Firm's	s EIN ▶	, .,	00-0000011
US	e O	niy	Firm's address ▶	- 40		Orive, Any		/ 10006				Phon		5	512-555-1212

23

24

Form 1120 (2021) Schedule C Dividends, Inclusions, and Special Deductions (see (a) Dividends and (c) Special deductions (b) % inclusions (a) \times (b) instructions) Dividends from less-than-20%-owned domestic corporations (other than debt-financed 50 2 Dividends from 20%-or-more-owned domestic corporations (other than debt-financed 65 nstructions 3 Dividends on certain debt-financed stock of domestic and foreign corporations Dividends on certain preferred stock of less-than-20%-owned public utilities 26.7 Dividends on certain preferred stock of 20%-or-more-owned public utilities . 50 Dividends from less-than-20%-owned foreign corporations and certain FSCs 65 Dividends from 20%-or-more-owned foreign corporations and certain FSCs Dividends from wholly owned foreign subsidiaries 100 8 See instructions 9 **Subtotal.** Add lines 1 through 8. See instructions for limitations Dividends from domestic corporations received by a small business investment 10 company operating under the Small Business Investment Act of 1958 100 100 11 Dividends from affiliated group members 100 12 Dividends from certain FSCs 13 Foreign-source portion of dividends received from a specified 10%-owned foreign 100 corporation (excluding hybrid dividends) (see instructions) 14 Dividends from foreign corporations not included on line 3, 6, 7, 8, 11, 12, or 13 15 Reserved for future use . . . 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) 100 43,668,620 43,668,620 Subpart F inclusions derived from hybrid dividends of tiered corporations (attach Form(s) Other inclusions from CFCs under subpart F not included on line 16a, 16b, or 17 (attach 160,000 700.000 17 Global Intangible Low-Taxed Income (GILTI) (attach Form(s) 5471 and Form 8992) . . . 215,000 18 Gross-up for foreign taxes deemed paid 19 IC-DISC and former DISC dividends not included on line 1, 2, or 3 20 21 Deduction for dividends paid on certain preferred stock of public utilities 437,500 22 Section 250 deduction (attach Form 8993)

Total dividends and inclusions. Add column (a), lines 9 through 20. Enter here and on

Total special deductions. Add column (c), lines 9 through 22. Enter here and on page 1, line 29b

44,106,120

44,743,620

September 13, 2022 Form 1120 (2021) Page 3

	edule 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)		
b	Credit from Form 8834 (see instructions)		
С	General business credit (attach Form 3800)		
d	Credit for prior year minimum tax (attach Form 8827)		
е	Bond credits from Form 8912		
6	Total credits. Add lines 5a through 5e	6	129,594
7	Subtract line 6 from line 4	7	168,000
8	Personal holding company tax (attach Schedule PH (Form 1120))	8	
9a	Recapture of investment credit (attach Form 4255)		
b	Recapture of low-income housing credit (attach Form 8611)		
С	Interest due under the look-back method—completed long-term contracts (attach Form 8697)		
d	Interest due under the look-back method—income forecast method (attach Form 8866) 9d		
е	Alternative tax on qualifying shipping activities (attach Form 8902) 9e		
f	Interest/tax due under section 453A(c) and/or section 453(l) 9f		
g	Other (see instructions—attach statement)		
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 I	Reserved For Future Use		
12	Reserved for future use	12	
Part I	II – Payments and Refundable Credits		
13	2020 overpayment credited to 2021	13	1,678,103
14	2021 estimated tax payments	14	15,000,000
15	2021 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	1/ /70 100
19	Total payments. Add lines 16, 17, and 18	19	16,678,103
20	Refundable credits from:		
a	Form 2439		
b	Form 4136		
C	Reserved for future use		
d 21	Other (attach statement—see instructions)	24	0
21 22	Total credits. Add lines 20a through 20d	21	0
23	Total payments and credits. Add lines 19 and 21. Enter here and on page 1, line 33	23	16.678.103

September 13, 2022 Form 1120 (2021) Page 4

Sch	edule K Other Information (see instructions)					
1	Check accounting method: a Cash b Accrual	c ☐ Other (specify) ▶			Yes	No
2	See the instructions and enter the:	50000				
a	Business activity code no.	522293				
b c	Business activity ► International Finance Product or service ► International Finance					
3	Is the corporation a subsidiary in an affiliated group or a parent-sul	osidiary controlled group?			√	
	If "Yes," enter name and EIN of the parent corporation ► ABC Fi				Ť	
4	At the end of the tax year:					
а	Did any foreign or domestic corporation, partnership (including					
	organization own directly 20% or more, or own, directly or indirect corporation's stock entitled to vote? If "Yes," complete Part I of Sc			ses of the	\checkmark	
b	Did any individual or estate own directly 20% or more, or own, directly			wer of all		
	classes of the corporation's stock entitled to vote? If "Yes," complete	ete Part II of Schedule G (Fo	rm 1120) (attach Schedul	e G) .		√
5	At the end of the tax year, did the corporation:		-, —			
а	Own directly 20% or more, or own, directly or indirectly, 50% or more	of the total voting power of a	Il classes of stock entitled	to vote of		
	any foreign or domestic corporation not included on Form 851, Affiliation	ns Schedule? For rules of con	structive ownership, see in	structions.	✓	
	If "Yes," complete (i) through (iv) below.	(ii) Employer		(iv) Pe	roonta	go.
	(i) Name of Corporation	Identification Number	(iii) Country of Incorporation	Öwned		
Foroic	n Finance Corporation	(if any)		31		
Foreig	In Finance Corporation		UK			100%
Foreig	ın Sands		NL			100%
			IVE			10070
b	Own directly an interest of 20% or more, or own, directly or indirectly, (including an entity treated as a partnership) or in the beneficial interes					
	If "Yes," complete (i) through (iv) below.	tora tract. For raise or const	ractive entreremp, eee me	il dollorio.		
	(i) Name of Entity	(ii) Employer Identification Number	(iii) Country of	(iv) M	aximur	m ned in
	(ly Hamo of Emily	(if any)	Organization	Profit, Los		
6	During this tax year, did the corporation pay dividends (other tha	n stock dividends and distr	ibutions in exchange for	stock) in		
	excess of the corporation's current and accumulated earnings and	profits? See sections 301 a	nd 316			✓
	If "Yes," file Form 5452, Corporate Report of Nondividend Distribution					
	If this is a consolidated return, answer here for the parent corporati	on and on Form 851 for eac	h subsidiary.			
7	At any time during the tax year, did one foreign person own, dire	,	0 1		√	
	classes of the corporation's stock entitled to vote or at least 25% of For rules of attribution, see section 318. If "Yes," enter:	of the total value of all classe	s of the corporation's sto	OCK? .		
	(a) Percentage owned ► 100 and (b) Owner's country	v ▶ UK				
	(c) The corporation may have to file Form 5472, Information Retur		U.S. Corporation or a For			
	Corporation Engaged in a U.S. Trade or Business. Enter the number	er of Forms 5472 attached	1			
8	Check this box if the corporation issued publicly offered debt instru	uments with original issue di	scount	. ▶□		
	If checked, the corporation may have to file $\bf Form~8281$, Information		0			
9	Enter the amount of tax-exempt interest received or accrued during					
10	Enter the number of shareholders at the end of the tax year (if 100		and the second s			
11	If the corporation has an NOL for the tax year and is electing to force		•			
	If the corporation is filing a consolidated return, the statement requor the election will not be valid.	, 0	```,	attached		
12	Enter the available NOL carryover from prior tax years (do not repage 1, line 29a.)		•			

September 13, 2022 Form 1120 (2021) Page 5

Sche	edule K Other Information (continued from page 4)		
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?	Yes	No ✓
	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		✓
45.	If "Yes," complete and attach Schedule UTP.		1
15a b	Did the corporation make any payments in 2021 that would require it to file 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?		1
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		✓
а	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.		
С	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 and by value. See instructions		v
	r crocinago. By voic		

Form **1120** (2021)

September 13, 2022 Form 1120 (2021) Page 6

Schedule L Balance Sheets per Books		Beginning	g of tax year	End of ta	f 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		
Sche	edule M-1 Reconciliation of Income (Loss) per Books \	With Income per Re	eturn			
	Note: The corporation may be req						
1	Net income (loss) per books		7 Income recorde	d on books this year			
2	Federal income tax per books			this return (itemize):			
3	Excess of capital losses over capital gains .			rest \$			
4	Income subject to tax not recorded on books						
•	this year (itemize):						
	· · · · · · · · · · · · · · · · · · ·			his return not charged			
5	Expenses recorded on books this year not			ome this year (itemize):			
•	deducted on this return (itemize):			. \$			
а	Depreciation \$		b Charitable contrib	utions \$			
b	Charitable contributions . \$						
С	Travel and entertainment . \$						
				8			
6	Add lines 1 through 5			ne 28)—line 6 less line 9			
	edule M-2 Analysis of Unappropriate	d Retained Earnin			1		
1	Balance at beginning of year	251,623		Cash			
2	Net income (loss) per books	135,879		Stock			
3	Other increases (itemize):	· ·	_	Property			
-				s (itemize):			
				6			
4	Add lines 1, 2, and 3	387,502		f year (line 4 less line 7)	387,502		
		•					

September 13, 2022 SCHEDULE G

1120 MeF ATS Scenario 3

Information on Certain Persons Owning the Corporation's Voting Stock

Tax Year 2022

(Rev. December 2011)
Department of the Treasury

(Form 1120)

► Attach to Form 1120.

► See instructions on page 2

OMB No. 1545-0123

Internal Revenue Service ► See instructions on page 2. **Employer identification number (EIN)** 00-0000003 Anywork Finance Incorporated 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). (ii) Employer Identification (i) Name of Entity (iii) Type of Entity (iv) Country of Organization (v) Percentage Owned in Voting Stock Number (if any) **ABC Finance** 00-0000021 Corporation UK 100% Certain Individuals and Estates Owning the Corporation's Voting Stock. (Form 1120, Schedule K, Part II 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). (iii) Country of (ii) Identifying Number (iv) Percentage Owned Citizenship (see instructions) (i) Name of Individual or Estate in Voting Stock (if any)

SCHEDULE M-3 (Form 1120)

2022 1120 MeF ATS Scenario 3 Net Income (Loss) Reconciliation for Corporations With Total Assets of \$10 Million or More **September 13, 2022**

(Rev. December 2019) Department of the Treasury

► Attach to Form 1120 or 1120-C.

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

OMB No. 1545-0123

	f corporation (common parent,	if consolidated return)			Employer ider	I ntification nu	mber
	rk Finance Incorporated					00-0000003	
	ck applicable box(es):	(1) Von-consolidated	return (2) Consc	olidated return (F			
	., ,	• •	.,			• /	
		(3) Mixed 1120/L/PC (group (4) 🗌 Dorma	ant subsidiaries	schedule atta	ached	
Part	Financial Inform	ation and Net Income (Loss) Reconciliation (s	see instructions	s)		
1a	Did the corporation file	SEC Form 10-K for its inco	me statement period endir	ng with or within	this tax year	?	
	☐ Yes. Skip lines 1b a	and 1c and complete lines 2	a through 11 with respect	to that SEC For	m 10-K.		
		See instructions if multiple					
b		pare a certified audited nor		-			
	No. Go to line 1c.	d complete lines 2a throug	n i i with respect to that in	icome statemen	Ι.		
С		pare a non-tax-basis incom	ne statement for that period	12			
		2a through 11 with respec	-				
	-	nrough 3c and enter the co			and records	on line 4a.	
			MM/DD/YYYY		MM/DD/	YYYY	_
b	•	ncome statement been rest		•	ne 2a?		
	Yes. (If "Yes," attac ✓ No.	h an explanation and the a	mount of each item restate	d.)			
С		income statement been re	stated for any of the five	income statem	ent periode i	mmediatel	W
	preceding the period on		stated for any of the live	income statem	siit perious i	minediatei	у
		h an explanation and the a	mount of each item restate	d.)			
	✓ No.						
3a		n's voting common stock p	ublicly traded?				
	Yes.✓ No. If "No," go to I	ino 4a					
b		e corporation's primary U	.S. publicly traded voting	common			
-				🖂		1	
С		SIP number of the corporate		ed voting		•	
4a		d net income (loss) from inc ndard used for line 4a (see		ntified in Part I, I	ine 1 .	4a	41,193,236
b	_	FRS (3) Statutory (4		ther (specify)			
5a	. ,	cludible foreign entities (atta	•			5a (41,193,236)
b		lible foreign entities (attach		oositive amount)		5b	
6a		cludible U.S. entities (attach	15			6a ()
b		lible U.S. entities (attach st	•	,		6b	
7a	* *	er includible foreign disreg er includible U.S. disregard	•	,		7a 7b	
b c	, ,	ier includible 0.3. disregard ier includible entities (attacl	,	,		7c	
8	,	ons of transactions between	,			10	
	statement)				•	8	
9	•	e income statement period	• '	,		9	
10a		adjustments to reconcile to				10a	
b		ting adjustments to reconci econcile to amount on line 1				10b	
с 11	•	income statement of incl	,			10c	125 070
•••		ust equal Part II, line 30, co	•		•		135,879
12		(not just the corporation's				ed or remo	oved on the
	following lines.	,					
			Total Assets	Total Liab			
a	Included on Part I, line		326,743,223		6,395,936		
b	Removed on Part I, line Removed on Part I, line		76,436,862		6,395,936		
	Included on Part I, line						
		ation and the Instructions fo		1			

September 13, 2022 Schedule M-3 (Form 1120) (Rev. 12-2019)

Page 2

	dule W-5 (F0111 1120) (Nev. 12-2013)			 	rage Z
	of corporation (common parent, if consolidated return)			Employer iden	tification number
	vork Finance Incorporated				0000003
	capplicable box(es): (1) Consolidated group (2) Parent corp	(3) Consolidated	eliminations (4) Subs	sidiary corp (5)	Mixed 1120/L/PC group
	k if a sub-consolidated: (6) 1120 group (7) 1120 eliminations	1			
Name	of subsidiary (if consolidated return)			Employer iden	tification number
Pa	rt II Reconciliation of Net Income (Loss) per	Income Stateme	ent of Includible Co	orporations Wi	th Taxable
	Income per Return (see instructions)				
	Income (Loss) Items	(a) Income (Loss) per	(b) Temporary	(c) Permanent	(d) Income (Loss)
	(Attach statements for lines 1 through 12)	Income Statement	Difference	Difference	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					
13	Interest income (see instructions)				
	Total accrual to cash adjustment				
15	Hedging transactions				
16					
17		((
18	Sale versus lease (for sellers and/or lessors)				,
19	Section 481(a) adjustments				
20	Unearned/deferred revenue				
21	Income recognition from long-term contracts				
	Original issue discount and other imputed interest .				
	Income statement gain/loss on sale, exchange,				
200	abandonment, worthlessness, or other disposition of				
	assets other than inventory and pass-through entities				
ŀ	Gross capital gains from Schedule D, excluding				
•	amounts from pass-through entities				
_	Gross capital losses from Schedule D, excluding				
	amounts from pass-through entities, abandonment				
	losses, and worthless stock losses				
	·				
(Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities,				
	abandonment losses, and worthless stock losses .				
_	Abandonment losses				
	Worthless stock losses (attach statement)				
	Other gain/loss on disposition of assets other than inventory				
	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)
29 a	Mixed groups, see instructions. All others, combine				
	lines 26 through 28	135,879	43,412,354		45,548,233
	PC insurance subgroup reconciliation totals				
	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, a	and column (d) mus	st equal Form 1120, p	age 1, line 28.	

through 38. Enter here and on Part II, line 27, reporting positive amounts as negative and negative amounts as positive

Tax Year 2022

Soho	September 13, 2022 dule M-3 (Form 1120) (Rev. 12-2019)	leF ATS Scena	rio 3		n 2
	e of corporation (common parent, if consolidated return)			Employer iden	Page 3
	work Finance Incorporated			, ,	0000003
	k applicable box(es): (1) Consolidated group (2) Parent corp	(3) Consolidated	eliminations (4) Subs		Mixed 1120/L/PC group
	k if a sub-consolidated: (6) 1120 group (7) 1120 eliminations	· · · —			
	e of subsidiary (if consolidated return)			Employer iden	tification number
Pa	Reconciliation of Net Income (Loss) per Income per Return—Expense/Deduction			rporations Wi	th Taxable
	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 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)				
	Current year acquisition or reorganization investment banking fees				
24	Current year acquisition or reorganization legal and accounting fees				
25					
	Amortization/impairment of goodwill				
	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)				
31	Section 162(r) — FDIC premiums paid by certain large financial institutions (see instructions)				
30	Other expense/deduction items with differences				
00	(attach statement)	256,260	(256,260)		0
39	Total expense/deduction items. Combine lines 1	230,200	(200,200)		
		1			1

256,260

(256,260)

0

$\begin{array}{c|c} \textbf{September 13, 2022} \\ \textbf{SCHEDULE N} & | \end{array}$

Anywork Finance Incorporated

Tax Year 2022 1120 MeF ATS Scenario 3

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.

OMB No. 1545-0123

00-0000003

Department of the Treasury Internal Revenue Service

(Form 1120)

Go to www.irs.gov/Form1120 for the latest information. **Employer identification number (EIN)**

Foreign Operations Information

		Yes	No
1a	During the tax year, did the corporation own (directly or indirectly) any foreign entity that was disregarded as an entity separate from its owner under Regulations sections 301.7701-2 and 301.7701-3 or did the corporation own (directly or indirectly) any foreign branch (see instructions)?	√	
	If "Yes," you are generally required to attach Form 8858 , Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), for each FDE and for each FB (see instructions).		
b	Enter the number of Forms 8858 attached to the corporation's tax return		
2	Enter the number of Forms 8865 , Return of U.S. Persons With Respect to Certain Foreign Partnerships, attached to the corporation's tax return		
3	Excluding any partnership for which a Form 8865 is attached to the tax return, did the corporation own at least a 10% interest, directly or indirectly, in any other foreign partnership (including an entity treated as a foreign partnership under Regulations section 301.7701-2 or 301.7701-3)?		√
4a	Reserved for future use		
b	Enter the number of Forms 5471 , Information Return of U.S. Persons With Respect to Certain Foreign Corporations, attached to the corporation's tax return		
5	During the tax year, did the corporation receive a distribution from, or was it the grantor of, or transferor to, a foreign trust?		✓
6a	At any time during the 2022 calendar year, did the corporation have an interest in or a signature or other authority over a financial account (such as a bank account, securities account, or other financial account) in a foreign country?	√	
b	See the instructions for exceptions and filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR). If "Yes," enter the name of the foreign country		
7a	Is the corporation claiming the extraterritorial income exclusion?		✓
b	Enter the number of Forms 8873 attached to the tax return		
С	Enter the total of the amounts from line 52 (extraterritorial income exclusion (net of disallowed deductions)) of all Forms 8873 attached to the tax return		
8	Was the corporation a specified domestic entity required to file Form 8938 for the tax year (see the Instructions for Form 8938)?		√

September 13, 2022

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

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

Form

▶ 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 lame o	f transferor	Identifying number (see instructions)
	ork Finance, Incorporated	that is not a controlled foreign corporation? . Yes No
1 2	If the transferor was a corporation, complete questions 2a thi	9 , — —
a	If the transfer was a section 361(a) or (b) transfer, was the	
а		
b	•	
	If not, list the controlling shareholder(s) and their identifying n	
		()
	Controlling shareholder	Identifying number
С	If the transferor was a member of an affiliated group filli corporation?	ng a consolidated return, was it the parent
	If not, list the name and employer identification number (EIN)	of the parent corporation.
	Name of parent corporation	EIN of parent corporation
	Name of parent corporation	EIN of parent corporation
d	Name of parent corporation Have basis adjustments under section 367(a)(4) been made?	
d 3	Have basis adjustments under section 367(a)(4) been made?	
	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the	
3	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the complete questions 3a through 3d.	
3	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	
3 a	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Did the partner pick up its pro rata share of gain on the transferors.	
3 a	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Did the partner pick up its pro rata share of gain on the transfer the partner disposing of its entire interest in the partnership.	
3 a b c	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Did the partner pick up its pro rata share of gain on the transfer the partner disposing of its entire interest in the partnership is the partner disposing of an interest in a limited partners securities market?	
3 a b c	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Did the partner pick up its pro rata share of gain on the transfers the partner disposing of its entire interest in the partnership is the partner disposing of an interest in a limited partners securities market?	
3 a b c d	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Did the partner pick up its pro rata share of gain on the transfer the partner disposing of its entire interest in the partnership is the partner disposing of an interest in a limited partners securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation)	
3 a b c d	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Did the partner pick up its pro rata share of gain on the transfer the partner disposing of its entire interest in the partnership is the partner disposing of an interest in a limited partners securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation)	EIN of partnership Fer of partnership assets?
b c d	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Did the partner pick up its pro rata share of gain on the transfer the partner disposing of its entire interest in the partnership is the partner disposing of an interest in a limited partners securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation)	EIN of partnership Fer of partnership assets? Yes Voo hip that is regularly traded on an established Fer of instructions) Sa Identifying number, if any 00-0000045 5b Reference ID number
b c d	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Did the partner pick up its pro rata share of gain on the transfer the partner disposing of its entire interest in the partnership is the partner disposing of an interest in a limited partners securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) Address (including country) Street, Birmingham, England 126375 Country code of country of incorporation or organization (see	EIN of partnership Fer of partnership assets?
b c d Part 4	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Did the partner pick up its pro rata share of gain on the transfers the partner disposing of its entire interest in the partnership is the partner disposing of an interest in a limited partners securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) Address (including country)	EIN of partnership Fer of partnership assets?
b c d Part 4 4 6 5 Any 7 8	Have basis adjustments under section 367(a)(4) been made? If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership. Name of partnership Did the partner pick up its pro rata share of gain on the transfer step the partner disposing of its entire interest in the partnership is the partner disposing of an interest in a limited partnership securities market? Transferee Foreign Corporation Information (see Name of transferee (foreign corporation) Address (including country) Street, Birmingham, England 126375 Country code of country of incorporation or organization (see	EIN of partnership Fer of partnership assets? Yes Voo hip that is regularly traded on an established

1120 MeF ATS Scenario 3 **September 13, 2022** Form 926 (Rev. 11-2018)

Tax Year 2022

Section A—Cas		g Transfer of Property	(see instructions)		
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	09-30-2022	Property	100,33		
If "Yes," sk	ip the remainder of	insferred?			🗌 Yes 🗌 No
Section B—Othe		nan intangible property su			
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	08-25-2022	IDD Stock	25,7!	52 35,45	52 0
nventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					
recognition 12a Were any a foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediated transferee If "Yes," co d Enter the tra If "No," ski	a agreement was file assets of a foreign be poration?	ock or securities subject ed?	hat is a foreign disregular to the substantially all of the specified 10%-own 2d, and go to line 13. Share to to line 13. The sas required under second to line 13.	parded entity) transferred to the assets of a foreign benefit foreign corporation?	Yes No d to a Yes No ranch Yes No
Section C — Intan	gible Property Sub	ject to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) (d) Useful Arm's lend on date of	oth price Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described n sec. 367(d)(4)					
Totals					

September 13, 2022 Form 926 (Rev. 11-2018) Page 3

14a b c d	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?
Supp	lemental Part III Information Required To Be Reported (see instructions)
	· · · · · · · · · · · · · · · · · · ·
Part	IV Additional Information Regarding Transfer of Property (see instructions)
	riaminanan madaminagan amig manasaran ya rapatay (ada manasaran)
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.
а	Gain recognition under section 904(f)(3)
b	Gain recognition under section 904(f)(5)(F)
С	Recapture under section 1503(d)
d	Exchange gain under section 987
19	Did this transfer result from a change in entity classification?
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) ▶ \$
С	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

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

Foreign Tax Credit—Corporations 1120 MeF ATS Scenario 3

September 13, 2022

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

, and ending

, 20 , or other tax year beginning 21 For calendar year 20

OMB No. 1545-0123 Sequence No. 118 Attachment 20

Employer identification number 00-000003

Anywork Finance Incorporated

Department of the Treasury Internal Revenue Service Name of corporation

(Rev. December 2021)

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

q

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

0		, , , , , , , , , , , , , , , , , , , ,		((2			
ň	Schedule A Incon	Income or (Loss) before Adjustments (Report all amounts in U.S. dollars, See Specific Instructions,	Adjustr	nents (He	sport all al	mounts in	U.S. dollars.	see sbe	CITIC INSTRUCTION	ons.)	
				2. Foreign Country or	Sountry or		Gross	Income or	(Loss) From Soul	Gross Income or (Loss) From Sources Outside the United States	States
	1. EIN or R (see	1. EIN or Reference ID Number (see instructions)*		U.S. Possession (enter two-letter code— use a separate line for	session etter code— ate line for	3. Inclus	3. Inclusions Under Sections 951(a)(1) and 951A (see instructions)	ions 951(a)(1) uctions)	and 951A	4. Dividends	5. Interest
				each) (see instructions)	structions)	(a) Exclude	(a) Exclude Gross-Up	(b) Gross-	(b) Gross-Up (section 78)		
⋖	00	00-0000045		Ϋ́	_		43,668,620				
m	00	00-0000046		N							
ပ											
Tota	Totals (add lines A through C)				A		43,668,620				
	6. Gross Rents, Royalties, and License Fees	7. Sales	.8 Per	8. Gross Income From Performance of Services	le From Services	9. Curre	9. Currency Gain	10. Currer (see in	10. Currency Gain Code (see instructions)	11. Other (attach schedule)	12. Total (add columns 3(a) through 9 and 11)
4											43,668,620
В											
ပ											
Totals											43,668,620
						13. Allocable	13. Allocable Deductions				
	spaopiviO (c)	(b) Deduction Allowed Index		Deduction Allowed Linder	- Index	Ren	Rental, Royalty, and Licensing Expenses	Licensing Exp	seuses		Expenses Allocable
	(see instructions)	Section 250(a)(1)(A)—Foreign Derived Intangible Income		(c) Deduction Allowed Original Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	wed onder 3)—Global ked Income	(d) Depreciati and Amo	(d) Depreciation, Depletion, and Amortization	(e) Oth	(e) Other Allocable Expenses	(f) Expenses Allocable to Sales Income	(g) Expenses Anotable to Gross Income From Performance of Services
4	43,668,620										
B											
ပ											
Totals	43,668,620	0									
		13. Allocable Deductions (continued)	s (continue	(pe			14. Apportioned Share	Share			
I.	(h) Currency Loss	(i) Currency Loss Code (see instructions)	(i) Other Allocable Deductions (attach schedule) (see instructions)	ocable ons redule) ctions)	(k) Total Allocable Deductions (add columns 13(a) through 13(h) and 13(j))	llocable ions ins 13(a)	or Deductions (enter amount from applicable line of Schedule H, Part II, column (b), and Schedule H, Part II, column (d))	from from s of art I, nd art II,	15. Net Operating Loss Deduction	16. Total Deductions (add columns 13(k) through 15)	17. Total Income or (Loss) Before Adjustments (subtract column 16 from column 12)
4				120,387	4	43,789,007				43,789,007	7 -120,387
æ											
ပ											
Totals				120,387	4	43,789,007				43,789,007	7 -120,387

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

September 13, 2022Form 1118 (Rev. 12-2021)

Schedule B

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

Page 2

40,075 0 0 1,417,113 11,788,082 175,000 11,963,082 297,594 (f) Other 3. Tax Deemed Paid (see instructions) 80 9 ÷ 12 ე 4 6 9 ^ 2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (e) Rents, Royalties, and License Fees 11,963,082 11,923,007 Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development 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, (j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i)) 8a 8b <u>a</u> N က 4 Ŋ 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 d) Interest Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, 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 2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (continued) Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III Part II – Separate Foreign Tax Credit (Complete a separate Part II for each applicable category of income, **Branch Remittances** enter the result from the "Totals" line of column 17 of the applicable Schedule A Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G, Part I) . . . Total taxable income from all sources (enter taxable income from the corporation's tax return). (i) Other 0 Tax Withheld at Source on: Part I-Foreign Taxes Paid, Accrued, and Deemed Paid (see instructions) (b) Distributions of Previously Taxed Earnings and Profits Total foreign taxes paid or accrued (total from Part I, column 2(j)) Total foreign taxes (combine lines 1a through 5) Credit limitation (add lines 11 and 12) (see instructions). Taxes reclassified under high-tax kickout Other Foreign Taxes Paid or Accrued on: (h) Services Income Total taxes deemed paid (total from Part I, column 3) line 3) plus any carrybacks to the current tax year (a) Dividends Increase in limitation (section 960(c)) . . . Multiply line 9 by line 10 Subtract line 8b from line 8a Date Accrued Accrued 1. Credit Is Claimed for Taxes Totals (add lines A through C) (check one): Sales (see instructions) 6 Date Paid ☐ Paid <u>1</u> Q 0 8a 0 ± 5 5 0 m 4 m ဖ _ 9 Totals A B 4 В O O

September 13, 2022

1120 MeF ATS Scenario 3

Page 3

from Part II, line 14, for **each** applicable category of income. **Do not** include taxes paid to sanctioned countries.) Foreign Tax Credit (Report all foreign tax amounts in U.S. dollars.) (continued) Part III—Summary of Separate Credits (Enter amounts Form 1118 (Rev. 12-2021) Schedule B

Tax Deemed Paid With Respect to Section 951(a)(1) Inclusions by Domestic Corporation Filing Return (Section 960(a)) ω o / N က 4 Ŋ 9 Total foreign tax credit (subtract line 8 from line 7). Enter here and on the appropriate line of the corporation's tax return Credit for taxes on section 901(j) category income (combine all such credits on this line) Credit for taxes on income re-sourced by treaty (combine all such credits on this line) Reduction in credit for international boycott operations (see instructions) Credit for taxes on foreign branch category income Credit for taxes on section 951A category income Credit for taxes on passive category income Credit for taxes on general category income Total (add lines 1 through 6). Schedule C 9

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). 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

	-		-			
1a. Name o	1a. Name of Foreign Corporation	1b.	1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	of the Foreign Corporation ions)	1c. QBU Referen	1c. QBU Reference ID (if applicable)
Foreign Finance Corp			00-000045)45		
		4. Functional Currency		gng. 2. Subp	5. Subpart F Income Group	
2. lax Year End (Year/Month) (see instructions)	 Country of Incorporation (enter country code — see instructions) 	of Foreign Corporation (enter code— see instructions)	(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)	(0)	(c) Unit
202112	NN	GBP				
6. Total Net Income in Subpart F Income Group	7. Total Current Year Taxes in		8. Section 951(a)(1) Inclusion Attributable to Subpart F Income Group	ubpart F Income Group	9. Divide Column 8(a)	10. Tax Deemed Paid
(in functional currency of foreign corporation)	(in U.S. dollars)	(a) Functional Currency		(b) U.S. Dollars	by Column 6	by column 9)
161,917,394		3,180,665	600,093,170	43,688,620	3.70616865	11,788,082
Total (add amounts in column 10)	10)					11,788,082

1120 MeF ATS Scenario 3 Tax Year 2022

September 13, 2022

Form 1118 (Rev. 12-2021)

Schedule D

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

Page 4

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).

4. Functional Currency of Foreign Corporation (enter code)				ted Foreign Income srued by CFC by column 8)						id / 80% (0.80). le on the line of corresponds with of Schedule A.)			(F000 OF 0 OFFF
3. Country of Incorporation (enter country code—see instructions)				Pro Rata Share of Tested Foreign Income Taxes Paid or Accrued by CFC (multiply column 7 by column 8)						4. Tax Deemed Paid (Multiply Part II, column 3, by 80% (0.80). 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.)			L
2. Tax Year End (Year/Month) (see instructions)				ncome Taxes m 5471) s)				·		(Mu Enter			
0				8. CFC's Tested Foreign Income Taxes From Schedule Q (Form 5471) (see instructions)						3. Multiply Part I, Column 9 Total, by Part II, Column 2 Percentage			
1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)		-		lumn 5 in 6						3. Multiply F Part II, C			
1b. EIN of the l	7. Divide Column 6 by Column 6		ntage. nn 1, by Total										
oration				6. CFC's Tested Income From Applicable Form 8992 Schedule (see instructions)			▼ Total (add amounts in column 5)		Paid	2. Inclusion Percentage. Divide Part II, Column 1, by Part I, Column 5 Total			
1a. Name of Foreign Corporation							■ Total	(x Deemed	Income			
1a. Name o				5. Pro Rata Share of CFC's Tested Income From Applicable Form 8992 Schedule (see instructions)				Fotal (add amounts in column 9)	Part II—Foreign Income Tax Deemed Paid	 Global Intangible Low-Taxed Income (section 951A inclusion) 			

September 13, 2022

Form 1118 (Rev. 12-2021)

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

(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 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 1 bof this Schedule E, Part I (see instructions).

Ta. Name of Distributing Foreign Corporation 1a. Name of Distributing Foreign Corporation 1a. Name of Distributing Foreign Corporation 1a. Name of Distributing Foreign Corporation 1b. EIN or Reference ID Number (Year/Month) (See instructions) (Year/Month) (See instructions) (S
8. Total Amount of the PTEP Group Taxes With Respect to PTEP Group Within an Annual PTEP Account Within an Annual PTEP Account
8. Total Amount of the PTEP Group Taxes With Respect to PTEP Group Within an Annual PTEP Account Within an Annual PTEP Account
8. Total Amount of the PTEP Group Taxes With Respect to PTEP Group Within an Annual PTEP Account
3,500,000
Total (add amounts in column 11)

1120 MeF ATS Scenario 3 Tax Year 2022

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Form 1118 (Rev. 12-2021)

September 13, 2022

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

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. Na	1a. Name of Distributing Foreign Corporation	oreign Corporation		1b. EIN or Reference ID Nur (see in	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)
Foreign Sands				9-00	00-0000046	202112	CA
4a. N	4a. Name of Recipient Foreign Corporation	oreign Corporation		4b. EIN or Reference ID Nur (see in	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)
						202112	JN
7. Functional Currency of the Distributing Foreign Corporation	8. PTEP Group (enter code)	9. Annual PTEP Account (enter year)	10. Total Amount of PTEP in the PTEP Group Within an Annual PTEP Account	11. Total Amount of the PTEP Group Taxes With Respect to PTEP Group Within an Annual PTEP Account	12. PTEP Distributed	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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September 13, 2022

Form 1118 (Rev. 12-2021)

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

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).

175,000 Incorporation (enter country 14. Foreign Income Taxes 3. Country of Incorporation (enter country 6. Country of **Previously Deemed Paid** instructions) instructions) code-see code-see Properly Attributable (multiply column 11 to PTEP and Not CA \exists by column 13) 5. Tax Year End (Year/Month) (see instructions) 2. Tax Year End (Year/Month) (see instructions) 202112 202112 13. Divide Column 12 by Column 10 **4b.** EIN or Reference ID Number of the Foreign Corporation (see instructions) EIN or Reference ID Number of the Foreign Corporation (see instructions) 12. PTEP Distributed 00-000046 the PTEP Group Taxes With Respect to PTEP Group 11. Total Amount of Within an Annual PTEP Account 3,500,000 10. Total Amount of PTEP in the PTEP Group Within an Annual PTEP Account 1a. Name of Distributing Foreign Corporation 9. Annual PTEP 4a. Name of Recipient Foreign Corporation (enter year) Account 8. PTEP Group (enter code) EUR 7. Functional Currency of the Distributing Foreign Corporation Foreign Sands

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September 13, 2022 Form 1118 (Rev. 12-2021) Schedule F

			282
Sc	Schedule F Reserved		
Sc	Schedule G Reductions of Taxes Paid, Accrued, or Deemed Paid		
Part	Part I – Reduction Amounts		
4	Reduction of taxes under section 901(e)—Attach separate schedule	A	
В	Reduction of foreign oil and gas taxes—Enter amount from Schedule I, Part II, line 4	В	
O	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	O	
۵	Reduction of taxes for section 6038(c) penalty—Attach separate schedule	D	
Ш	Taxes suspended under section 909	E	
ш	Reduction for disallowed taxes under section 965(g)	ш	
g	Reduction for disallowed taxes under section 245A	5	
I	Other reductions in taxes (attach schedule—see instructions)	I	11,923,007
Total Part	Total (add lines A through H). Enter here and on Schedule B, Part II, line 3.		11,923,007
-	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) .		A
7	J Check this box if, during the tax year, the corporation paid or accrued any foreign tax that was disqualified for credit under section 901(()), (k), or (()).	(1)	□ ▲

Foreign Tax Credit—Corporations 1120 MeF ATS Scenario 3

September 13, 2022

► Attach to the corporation's tax return.

▶ Go to www.irs.gov/Form1118 for instructions and the latest information. , and ending , 20 , or other tax year beginning 21

For calendar year 20

Department of the Treasury Internal Revenue Service Name of corporation

q a

(Rev. December 2021)

OMB No. 1545-0123 Sequence No. 118 **Employer identification number** Attachment 20

00-000003

951A

If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) (see instructions). Use a separate Form 1118 for each applicable category of income Separate Category (Enter code—see instructions.)

O	If one of the RBT co	If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)	a, enter the	e country co	ode for the t	treaty coun	itry (see instru	ctions)				1
S	Schedule A Inc	Income or (Loss) Before Adjustments (R	ore Adjust	tments (Re	eport all an	nounts in	U.S. dollars.	See Sp	leport all amounts in U.S. dollars. See Specific Instructions.	ons.)		1 1
				2. Foreign	Country or		Gross	Income or	(Loss) From Soul	Gross Income or (Loss) From Sources Outside the United States	States	
	- EIN S	1. EIN or Reference ID Number (see instructions)*		U.S. Possession (enter two-letter code— use a separate line for	U.S. Possession (enter two-letter code— use a separate line for	3. Inclus	3. Inclusions Under Sections 951(a)(1) and 951A (see instructions)	ons 951(a)(1 uctions)) and 951A	4. Dividends	5. Interest	
				each) (see ir	instructions)	(a) Exclude	(a) Exclude Gross-Up	(b) Gross	(b) Gross-Up (section 78)	(See mondenous)		
4		00-0000046		Z	N		700,000		175,000			ı
m												ı
ပ												ı
Tot	Totals (add lines A through C)	C) · · · · · ()			^		700,00		175,000			
	6. Gross Rents, Royalties, and License Fees	s, 7. Sales		8. Gross Income From Performance of Service:	ne From Services	9. Currel	9. Currency Gain	10. Curre (see i	10. Currency Gain Code (see instructions)	11. Other (attach schedule)	12. Total (add columns 3(a) through 9 and 11)	
4											875,000	1
m												ı
ပ												ı
Totals											875,000	1
						13. Allocable	13. Allocable Deductions					i
	(a) Dividends	(b) Deduction Allowed		(c) Deduction Allowed Under	wed Under	Ren	Rental, Royalty, and Licensing Expenses	icensing Ex	benses	:	(a) Expenses Allocable	ı
	Received Deduction (see instructions)	Section 250(a)(1)(A)—Foreign Derived Intangible Income		Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	B)—Global xed Income	(d) Depreciation and Amo	(d) Depreciation, Depletion, and Amortization	#0 (e)	(e) Other Allocable Expenses	(f) Expenses Allocable to Sales Income	to Gross Income From Performance of Services	
4					437,500							1 1
B												
ပ												ı
Totals					437,500							ı
		13. Allocable Deductions (continued)	ctions (continu	(per			14. Apportioned Share	Share				ı
	(h) Currency Loss	(i) Currency Loss Code (see instructions)	(j) Other Allocable Deductions (attach schedule) (see instructions)	Allocable trions chedule) uctions)	(k) Total Allocable Deductions (add columns 13(a) through 13(h) and 13(f)	locable ons ns 13(a) and 13(j))	(enter amount from applicable line of Schedule H, Part II, column (b), and Schedule H, Part II, column (d))	rom of urt, rtl,	15. Net Operating Loss Deduction	16. Total Deductions (add columns 13(k) through 15)	17. Total Income or (Loss) Before Adjustments (subtract column 16 from column 12)	
4						437,500				437,500	0 437,500	1
В												ı
ပ												ı
Totals						437,500				437,500	0 437,500	۱ _

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

ario 3

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September 13, 2022Form 1118 (Rev. 12-2021)

Schedule B

Tax Year 2022 1120 MeF ATS Scenario 3

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

76,878 76,878 1,417,113 76,878 140,000 0.258330846 297,594 140,000 366,084 (f) Other 3. Tax Deemed Paid (see instructions) 13 80 9 ÷ 12 4 6 9 ^ 2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (e) Rents, Royalties, and License Fees 140,000 1,417,113 Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development 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, (j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i)) 8a <u>п</u> 8b က N 4 Ŋ 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 d) Interest Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, 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 2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (continued) Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III Part II – Separate Foreign Tax Credit (Complete a separate Part II for each applicable category of income, **Branch Remittances** Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G, Part I) . . . enter the result from the "Totals" line of column 17 of the applicable Schedule A Total taxable income from all sources (enter taxable income from the corporation's tax return). (i) Other 0 Tax Withheld at Source on: Part I-Foreign Taxes Paid, Accrued, and Deemed Paid (see instructions) (b) Distributions of Previously Taxed Earnings and Profits Total foreign taxes paid or accrued (total from Part I, column 2(j)) Fotal foreign taxes (combine lines 1a through 5) Credit limitation (add lines 11 and 12) (see instructions). Taxes reclassified under high-tax kickout Other Foreign Taxes Paid or Accrued on: (h) Services Income Total taxes deemed paid (total from Part I, column 3) line 3) plus any carrybacks to the current tax year (a) Dividends Increase in limitation (section 960(c)) . . . Multiply line 9 by line 10 Subtract line 8b from line 8a Date Accrued Accrued 1. Credit Is Claimed for Taxes Totals (add lines A through C) (check one): Sales (see instructions) 6 Date Paid Paid <u>1</u> Q 0 8a **ග** ± 5 5 0 m 4 m 9 _ 9 Totals A B ပ 4 В O

September 13, 2022 Form 1118 (Rev. 12-2021)

1120 MeF ATS Scenario 3

Page 3

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, 76,878 Foreign Tax Credit (Report all foreign tax amounts in U.S. dollars.) (continued) Credit for taxes on section 951A category income Schedule B

129,594 129,594 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) 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 Tax Deemed Paid (multiply column 7 by column 9) 1c. QBU Reference ID (if applicable) Tax Deemed Paid With Respect to Section 951(a)(1) Inclusions by Domestic Corporation Filing Return (Section 960(a)) ω o / (c) Unit 17,572 35,144 A 9. Divide Column 8(a) 5. Subpart F Income Group by Column 6 N က 4 Ŋ 9 Total foreign tax credit (subtract line 8 from line 7). Enter here and on the appropriate line of the corporation's tax return (b) Reg. sec. 1.904-4(c)(3)(i)-(iv) (enter code) 1b. EIN or Reference ID Number of the Foreign Corporation 8. Section 951(a)(1) Inclusion Attributable to Subpart F Income Group (b) U.S. Dollars (see instructions) (a) Reg. sec. 1.960-1(d)(2)(ii)(B)(2) Credit for taxes on section 901(j) category income (combine all such credits on this line) (enter code) Credit for taxes on income re-sourced by treaty (combine all such credits on this line) (a) Functional Currency Reduction in credit for international boycott operations (see instructions) 4. Functional Currency of Foreign Corporation see instructions) (enter code— Credit for taxes on foreign branch category income 7. Total Current Year Taxes in Subpart F Income Group 3. Country of Incorporation Credit for taxes on passive category income Credit for taxes on general category income (in U.S. dollars) (enter country code see instructions) 1a. Name of Foreign Corporation Total (add lines 1 through 6) . . Total (add amounts in column 10) Subpart F Income Group (in functional currency of foreign corporation) 6. Total Net Income in (see instructions) Tax Year End (Year/Month) Schedule C က 4 6 9 7 ∞ 0

1120 MeF ATS Scenario 3 Tax Year 2022

September 13, 2022

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

Form 1118 (Rev. 12-2021)

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)

Page 4

 Pro Rata Share of Tested Foreign Income Taxes Paid or Accrued by CFC (multiply column 7 by column 8) 140,000 200,000 200,000 (Multiply Part II, column 3, by 80% (0.80). 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, Currency of 4. Functional Corporation (enter code) Foreign EUR 4. Tax Deemed Paid 3. Country of Incorporation (enter country code—see instructions) Z 50,000 2. Tax Year End (Year/Month) (see instructions) 8. CFC's Tested Foreign Income Taxes 202112 From Schedule Q (Form 5471) 175,000 (see instructions) 3. Multiply Part I, Column 9 Total, by Part II, Column 2 Percentage 1b. EIN or Reference ID Number of the Foreign Corporation (see instructions) 4 00-000046 7. Divide Column 5 by Column 6 875 2. Inclusion Percentage. Divide Part II, Column 1, by Part I, Column 5 Total 200,000 ▼ Total (add amounts in column 5) From Applicable Form 8992 Schedule (see instructions) 6. CFC's Tested Income Part II - Foreign Income Tax Deemed Paid 1a. Name of Foreign Corporation 700,000 Global Intangible Low-Taxed Income (section 951A inclusion) 800,000 5. Pro Rata Share of CFC's Tested Income From Applicable Form 8992 Schedule (see instructions) Total (add amounts in column 9) Foreign Sands

Foreign Tax Credit—Corporations 1120 MeF ATS Scenario 3

September 13, 2022

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

, and ending , 20 , or other tax year beginning

OMB No. 1545-0123 Sequence No. 118 **Employer identification number** Attachment 20

00-000003

(see instructions). Use a separate Form 1118 for each applicable category of income 21 For calendar year 20

If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)

Separate Category (Enter code—see instructions.)

ه م

Anywork Finance Incorporated

Department of the Treasury Internal Revenue Service Name of corporation

(Rev. December 2021)

<u>ن</u>	א ישה פווו וט פווט וו	c il olle ol trie ndi codes is entered on ille a, enter trie codritty code for trie treaty counity (see ilistractions)	a, enter tn	e country c	sode for the	treaty cou	ntry (see instru				
ŏ	Schedule A Inc	Income or (Loss) Before	re Adjus	tments (F	Report all a	mounts in	U.S. dollars.	See Sp	(Loss) Before Adjustments (Report all amounts in U.S. dollars. See Specific Instructions,	ns.)	
				2. Foreign	Country or		Gross	Income o	r (Loss) From Sourc	Gross Income or (Loss) From Sources Outside the United States	itates
	1. EIN C	1. EIN or Reference ID Number (see instructions)*		U.S. Pc (enter two- use a sepa	U.S. Possession (enter two-letter code— use a separate line for	3. Inclu	3. Inclusions Under Sections 951(a)(1) and 951A (see instructions)	ions 951(a)(⁻ uctions)) and 951A	4. Dividends	5. Interest
				each) (see	each) (see instructions)	(a) Exclud	(a) Exclude Gross-Up	(b) Gross	(b) Gross-Up (section 78)		
4		00-000018			NL						
B											
ပ											
Tota	Totals (add lines A through C)	()	•		•						
	6. Gross Rents, Royalties, and License Fees	s, 7. Sales		8. Gross Income From Performance of Services	me From if Services	9. Curre	9. Currency Gain	10. Curre (see	10. Currency Gain Code (see instructions)	11. Other (attach schedule)	12. Total (add columns 3(a) through 9 and 11)
⋖		20	200,000		100,000						300,000
B											
ပ											
Totals		20	200,000		100,000						300,000
						13. Allocab	13. Allocable Deductions				
I	(a) Dividends	(b) Deduction Allowed		(c) Deduction Allowed Under	owed Under	Re	Rental, Royalty, and Licensing Expenses	Licensing Ex	sesued		(a) Expenses Allocable
	Received Deduction (see instructions)	Section 250(a)(1)(A)—Foreign Derived Intangible Income		Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	(B)—Global axed Income	(d) Deprecial and Am	(d) Depreciation, Depletion, and Amortization	(e) Ot E	(e) Other Allocable Expenses	(f) Expenses Allocable to Sales Income	to Gross Income From Performance of Services
4										150,000	50,000
B											
ပ											
Totals										150,000	20,000
		13. Allocable Deductions (continued)	tions <i>(contin</i>	(pen			14. Apportioned Share	Share			
	(h) Currency Loss	(i) Currency Loss Code (see instructions)	(j) Other Deduc (attach s (see inst	(j) Other Allocable Deductions (attach schedule) (see instructions)	(k) Total Allocable Deductions (add columns 13(a) through 13(h) and 13(j)	vilocable tions nns 13(a) nand 13(j))	on Deductions (enter amount from applicable line of Schedule H, Part I, column (b), and Schedule H, Part II, column (d))	from from e of art I, nd	15. Net Operating Loss Deduction	16. Total Deductions (add columns 13(k) through 15)	17. Total Income or (Loss) Before Adjustments (subtract column 16 from column 12)
4										200,000	100,000
m											
ပ											

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

100,000

200,000

rio 3

Tax Year 2022 1120 MeF ATS Scenario 3 Page 2

September 13, 2022 Form 1118 (Rev. 12-2021)

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

Schedule B

17,572 20,000 1,417,113 0.059046809 17,572 83,676 297,594 (f) Other 3. Tax Deemed Paid (see instructions) 13 80 9 ÷ 12 4 ၈ 9 ^ 2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (e) Rents, Royalties, and License Fees 20,000 Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development 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, 20,000 (j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i)) 8a <u>a</u> 8b က N 4 Ŋ 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 d) Interest Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, 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 2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (continued) Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III Part II – Separate Foreign Tax Credit (Complete a separate Part II for each applicable category of income, **Branch Remittances** enter the result from the "Totals" line of column 17 of the applicable Schedule A Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G, Part I) . . . Total taxable income from all sources (enter taxable income from the corporation's tax return). (i) Other 0 Tax Withheld at Source on: Part I-Foreign Taxes Paid, Accrued, and Deemed Paid (see instructions) (b) Distributions of Previously Taxed Earnings and Profits Total foreign taxes paid or accrued (total from Part I, column 2(j)) 799'9 Fotal foreign taxes (combine lines 1a through 5) Credit limitation (add lines 11 and 12) (see instructions). Other Foreign Taxes Paid or Accrued on: Taxes reclassified under high-tax kickout (h) Services Income Total taxes deemed paid (total from Part I, column 3) line 3) plus any carrybacks to the current tax year (a) Dividends Increase in limitation (section 960(c)) . . . Multiply line 9 by line 10 13,333 Subtract line 8b from line 8a Date Accrued Accrued 1. Credit Is Claimed for Taxes Totals (add lines A through C) (check one): Sales (see instructions) 6 Date Paid Paid <u>1</u> Q 0 8a **ග** ± 5 5 0 m 4 m ဖ _ 9 Totals A B ပ 4 В O

Foreign Tax Credit—Corporations 1120 MeF ATS Scenario 3

September 13, 2022

► Attach to the corporation's tax return.

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

21

For calendar year 20

Sequence No. 118 **Employer identification number** Attachment 20

OMB No. 1545-0123

00-000003

, and ending If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) , 20 (see instructions). , or other tax year beginning Use a separate Form 1118 for each applicable category of income

Separate Category (Enter code—see instructions.)

q

Anywork Finance Incorporated

Department of the Treasury Internal Revenue Service Name of corporation

(Rev. December 2021)

ပ		If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)	enter the country (code for the	treaty cour	ntry (see instruα	ctions) .			
(C)	Schedule A Inco	Income or (Loss) Before Adjustments (Report all amounts in U.S. dollars. See Specific Instructions.	Adjustments (F	Report all ar	mounts in	U.S. dollars.	See Spec	ific Instructio	ins.)	
			2. Foreign	2. Foreign Country or		Gross	ncome or (oss) From Sour	Gross Income or (Loss) From Sources Outside the United States	States
	1. EIN c (s	1. EIN or Reference ID Number (see instructions)*	U.S. Po (enter two- use a sep	U.S. Possession (enter two-letter code— use a separate line for	3. Inclus	3. Inclusions Under Sections 951(a)(1) and 951A (see instructions)	ons 951(a)(1) a ctions)	nd 951A	4. Dividends	5. Interest
			each) (see	each) (see instructions)	(a) Exclude	(a) Exclude Gross-Up	(b) Gross-U	(b) Gross-Up (section 78)		
⋖		00-0000046		N		160,000		40,000		
m										
ပ										
Tol	Totals (add lines A through C)	C) · · · · · ()		▲		160,000		40,000		
	6. Gross Rents, Royalties, and License Fees	5, 7. Sales	8. Gross Income From Performance of Services	ime From of Services	9. Curre	9. Currency Gain	10. Currenc (see insi	10. Currency Gain Code (see instructions)	11. Other (attach schedule)	12. Total (add columns 3(a) through 9 and 11)
⋖										200,000
m										
ပ										
Totals										200,000
					13. Allocable	13. Allocable Deductions				
	(a) Dividends	(h) Deduction Allowed I'll	der (c) Deduction Allowed Hoder	Inder	Ren	Rental, Royalty, and Licensing Expenses	icensing Expe	nses		(a) Expenses Allocable
	Received Deduction (see instructions)	Section 250(a)(1)(A)—Foreign Derived Intangible Income		(B)—Global axed Income	(d) Depreciati and Amo	(d) Depreciation, Depletion, and Amortization	(e) Other Expé	(e) Other Allocable Expenses	(f) Expenses Allocable to Sales Income	to Gross Income From Performance of Services
⋖										
B										
ပ										
Totals										
		13. Allocable Deductions (continued)	ns (continued)			14. Apportioned Share	Share			
	(h) Currency Loss	(i) Currency Loss Code (see instructions)	(i) Other Allocable Deductions (attach schedule) (see instructions)	(k) Total Allocable Deductions (add columns 13(a) through 13(h) and 13(j)	llocable ions ins 13(a)	or Deductions (enter amount from applicable line of Schedule H, Part II, column (b), and Schedule H, Part II,		15. Net Operating Loss Deduction	16. Total Deductions (add columns 13(k) through 15)	17. Total Income or (Loss) Before Adjustments (subtract column 16 from column 12)
⋖										200,000
B										
ပ										
Totals										200,000

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

September 13, 2022 Form 1118 (Rev. 12-2021)

Page 2

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)

5		2,2			6								
_	1. Credit Is Cla	 Credit Is Claimed for Taxes 		2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)	d or Accrued (atta	ch schedule showir	ng amounts in foreig	n currency and	d conversion rat	(s) pesn			
	(check one)	[Tax Withheld at Source on:	urce on:								
	Paid	Accrued	(a) Dividends	(b) Distributions of Previously Taxed		c) Branch Remittances	(d) Interest	st	(e) Rents, Royalties, and License Fees	alties, Fees		(f) Other	
<			3	Earnings and Prot	IIIS								
([- 					
C													
]	Totals (add lines A through C)	rough C) .				- -							
		2. Foreign Taxes Pai	2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (continued)	showing amounts in fo	oreign currency ar	nd conversion rate(s) used) (continued)						1
		Other Foreig	Other Foreign Taxes Paid or Accrued on:					:		ĸ	. Tax Dee	3. Tax Deemed Paid	
	(9) Sales	sels	(h) Services Income		(i) Other		(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))	otal Foreign Taxes Paid or Acci (add columns 2(a) through 2(i))	ecrued (i))		(see instructions)	uctions)	
⋖												40,000	0
В													
ပ													
Totals													
Pal	rt II – Separate I	Foreign Tax Cre	Part II - Separate Foreign Tax Credit (Complete a separate Part II for	rate Part II for e	each applica	each applicable category of income.	of income.)						
-	1a Total foreign ta	axes paid or accru	Total foreign taxes paid or accrued (total from Part I, column	umn 2(j))				1 a	4(40,000			
	b Foreign taxes	paid or accrued	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of	ng prior tax years	s that were su	uspended due	rior tax years that were suspended due to the rules of						
	(see instructions)	(SL						4					
N		emed paid (total fi	Total taxes deemed paid (total from Part I, column 3)					7					
က		taxes paid, accru	Reductions of taxes paid, accrued, or deemed paid (enter to	er total from Sche	tal from Schedule G, Part I)	(1		ဧ					
4	'	fied under high-ta	Faxes reclassified under high-tax kickout					4					
2		of any carryover	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III,	chedule K, line 3,	, column (xiv),	and from Sch	edule I, Part III,	ı					
•		/ carrybacks to th	<u>⊾</u>					ဂ		T			
9	_	Fotal foreign taxes (combine lines 1a through 5)	es 1a through 5)								9	40,000	o١
7	7 Enter the amo	unt from the app.	Enter the amount from the applicable column of Schedule J, Part I, line 11 (se enter the result from the "Totals" line of column 17 of the applicable Schedule A	lule J, Part I, line	11 (see instruedule A	J, Part I, line 11 (see instructions). If Schedule plicable Schedule A	edule J is not	required to	J is not required to be completed,			167.353	co
∞	8a Total taxable in	ncome from all so	Total taxable income from all sources (enter taxable income from the corporation's tax return)	ome from the corp	ooration's tax	return)		8a	1,417	417,113			1
	b Adjustments to	o line 8a (see instr	Adjustments to line 8a (see instructions)					8b					
	c Subtract line 8	Subtract line 8b from line 8a									8c	1,417,113	\sim
6		y line 8c. Enter the	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	decimal (see instr	uctions). If line	e 7 is greater th	an line 8c, ente				6	0.118094323	ကြ
10		me tax against w	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development	gular tax liability ((see section 20	6(b)) minus any	American Sam	oa econom	ic developm		5	797 F9A	4
-		Multiply line 9 by line 10									2 7	35 144	4
- 5		Increase in limitation (section 960(c))									- 2		- 0
<u>τ</u> ε		n (add lines 11 an	Credit limitation (add lines 11 and 12) (see instructions).						· ·		13	35,144) 4
5 4		ian tax credit (en	Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part II	or line 13). Enter h	ere and on the	e appropriate li	ne of Part III	 	· ·		4	35,144	4
-		ואון ימע סו סמור לפיי		יי יטייי יטיי ביוורטי	מוס מומס סו	יי טישיויסטיטטשיט				-	<u>.</u>	- 100	ŗΙ

Foreign Tax Carryover Reconciliation Schedule 1120 MeF ATS Scenario 3 Tax Year 2022

> September 13, 2022 SCHEDULE K (Form 1118)

(Rev. December 2018)

Department of the Treasury Internal Revenue Service

Name of corporation

and ending ▶ See separate instructions. or other tax year beginning For calendar year 20

▶ Attach to Form 1118.

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

Employer identification number

OMB No. 1545-0123

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0000003 FВ 8 If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) If code RBT is entered on line a, enter the country code for the treaty country (see instructions) . Use a separate Schedule K (Form 1118) for each category of income (see instructions). Separate Category (enter code—see instructions) Anywork Finance Incorporated

	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))
-	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))							
8	Adjustments to line 1 (enter description —see instructions):							
a	Carryback adjustment (see instructions)							
q	Adjustments for section 905(c) redeterminations (see instructions)							
ပ								
ס								
Ф								
Ŧ								
Б								
ო	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)							
ည	Foreign tax carryover expired unused in current tax year (enter as a negative number)							
9	Foreign tax carryover generated in current tax year							
_	Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number)							
ω	Foreign tax carryover to the following tax year. Combine lines 3 through 7.	-0-						

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

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

September 13, 2022 Schedule K (Form 1118) (Rev. 12-2018)

Sche	Schedule K (Form 1118) (Rev. 12-2018)			LIZO MET ALO OCCUALO S	2			Page 2
	Foreign Tax Carryover Reconciliation <i>(continued)</i>	(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 (xiiii)
-	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))							
0	Adjustments to line 1 (enter description—see instructions):							
a	Carryback adjustment (see instructions)							
q	Adjustments for section 905(c) redeterminations (see instructions)							
ပ								
٥								
Φ								
-								
5								
ო	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)							
2	Foreign tax carryover expired unused in current tax year (enter as a negative number)							
9	Foreign tax carryover generated in current tax year						2,428	2,428
^	Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number)							
ω	Foreign tax carryover to the following tax year. Combine lines 3 through 7.						2,428	2,428
					·			

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

September 13, 2022 SCHEDULE K

Tax Year 2022 1120 MeF ATS Scenario 3 Foreign Tax Carryover Reconciliation Schedule

(Rev. December 2018) (Form 1118)

Depart Interna Name

	For calendar year 20, or other tax year beginning, 20, and ending
. December 2018)	▶ See separate instructions.
artment of the Treasury	► Attach to Form 1118.
nal Revenue Service	▶ Go to www.irs.gov/Form1118 for instructions and the latest information.
e of corporation	
work Finance Incorporated	pa
/ - - - - - - - - - -	\

Employer identification number

OMB No. 1545-0123

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00 0000003	Separate Schedule K (Form 1118) for each category of income (see instructions). Separate Category (enter code—see instructions)	(ii) (iii) (iv) (v) (vi) Subtotal Subtotal Sth Preceding Fear Tax Year Tax				
	ome (see instructions, the sanctioned count the treaty country (se	(ii) 9th Preceding 8 Tax Year				
	r each category of inc instructions) r the country code for r the country code for r the country code for	(i) 10th Preceding Tax Year				
Anywork Finance Incorporated	Use a separate Schedule K (Form 1118) for each category of income (see instructions). a Separate Category (enter code—see instructions)	Foreign Tax Carryover Reconciliation	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)

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Schedule K (Form 1118) (Rev. 12-2018)	Schedule K (Cat. No. 51904R	rm 1118.	e Instructions for Fo	For Paperwork Reduction Act Notice, see the Instructions for Form 1118.	For
				-0-	Foreign tax carryover to the following tax year. Combine lines 3 through 7.	∞
					Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number)	۲
					Foreign tax carryover generated in current tax year	9
					Foreign tax carryover expired unused in current tax year (enter as a negative number)	ស
					Foreign tax carryover used in current tax year (enter as a negative number)	4
					Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2)	ო

September 13, 2022 Schedule K (Form 1118) (Rev. 12-2018)

Sch	Schedule K (Form 1118) (Rev. 12-2018)			TEO INGL ATO OCCURATION	2			Page 2
	Foreign Tax Carryover Reconciliation <i>(continued)</i>	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))
-	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))							
8	Adjustments to line 1 (enter description—see instructions):							
a	Carryback adjustment (see instructions)							
q	Adjustments for section 905(c) redeterminations (see instructions)							
ပ								
р								
Ф								
-								
5								
ო	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)							
ro	Foreign tax carryover expired unused in current tax year (enter as a negative number)							
9	Foreign tax carryover generated in current tax year						4,856	4,856
۲	Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number)							
∞	Foreign tax carryover to the following tax year. Combine lines 3 through 7.						4,856	4,856
							Schedule K (Fc	Schedule K (Form 1118) (Rev. 12-2018)

Tax Year 2022

September 13, 2022 Schedule J

Adjustments to Separate Limitation Income (Loss) Categories for 1120 MeF ATS Scenario 3

(Form 1118)

(Rev. December 2020)

Department of the Treasury Internal Revenue Service

20

For calendar year 20

Anywork Finance, Incorporated Name of corporation

Determining Numerators of Limitation Fractions, Year-End Recharacterization Balances, and Overall Foreign and Domestic Loss Account Balances , and ending

1

00-000003

Employer identification number

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▶ Attach to Form 1118. , or other tax year beginning

OMB No. 1545-0123

Part Adjustments to Separate Limitation Income or	ation Income or (Los	sses) in Determini	ng Numerators of	(Losses) in Determining Numerators of Limitation Fractions (see instructions)	see instructions)	
					(v) Other income*	
. [Section 951A income	(ii) Foreign branch income	(III) Passive category income	(IV) General category income	(identi	(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 ▶	1					
) (()	(()		
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)
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.

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

Cat. No. 10309U

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

September 13, 2022 Schedule J (Form 1118) (Rev. 12-2020)

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					(v) Other income*	į
	Section 951A income	Foreign branch income	ory income	General category income (identify ▶	(identify ▶	U.S. income
a Section 951A income						
b Foreign branch income			5			
c Passive category income						
d General category income	71,416	16,324	32,647			
e Other income* (identify ▶						
			<u>_</u>			
Part III Overall Foreign Loss Account Balances (section		904(f)(1)) Complete	Complete for each separate limitation income category.	itation income cate	egory.	
1 Beginning balance						
2 Current year additions						
3 Current year reductions (other than						
recapture)	<u>)</u>	()(
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))	t Balances (section	1 904(g)(1))				
1 Beginning balance						
2 Current year additions						
3 Current year reductions (other than						
recapture)	<u> </u>	(<u>)</u> (
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.	instructions.					

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

Tax Year 2022 1120 MeF ATS Scenario 3

Information Return of U.S. Persons With Respect

(Rev. December 2022)

to Certain Foreign Corporations

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

OMB No. 1545-0123

Department of the Treasury

Attachment Sequence No. **121**

internal nevenue service	section 696) (see instructions) be	eginning Jan o	1 , 20 22	, and ending	Dec 31	, 20 2	2	
Name of person filing this re	eturn		AI	dentifying numbe	r			
Anywork Finance Inco	prporated				00-	000000	3	
Number, street, and room or s	uite no. (or P.O. box number if mail is not de	livered to street addres	ss) B (Category of filer (Se	ee instruction	ns. Check	applicable box(e	s).):
35 Any Street			'	a			, ,	, ,
City or town, state, and ZIP	code		C	Enter the total perc	entage of th	e foreign	corporation's voti	ng
				stock you owned a	t the end of	its annua	accounting perio	d 100 %
Filer's tax year beginning		2 , and ending	Decem		20 22			
D Check box if this is a fina	al Form 5471 for the foreign corporation					<u> </u>		🔲
E Check if any excepted sp	pecified foreign financial assets are repo	orted on this form (se	e instructions)				🗆
F Check the box if this For	m 5471 has been completed using "Alte	ernative Information"	under Rev. Pr	roc. 2019-40 .	. 🕠 ./ .			🗆
G If the box on line F is che	ecked, enter the corresponding code for	r "Alternative Informa	ition" (see inst	tructions)				
H Person(s) on whose beha	alf this information return is filed:							
.,						(4)	Check applicable	box(es)
(1) Nam	e	(2) Address		(3) Identifyir	ng number	Sharehol		Director
						Orial orio	0	200101
			_				_	
			_				_	_
=	applicable lines and schedules herwise indicated.	s. All information	n must be	ın English. Ali	amounts	must	be stated in (J.S. dollars
1a Name and address of	foreign corporation				b(1) Emp	lover ider	tification number	, if any
Foreign Finance Corp					` ' '		0-0000045	,
75 Any Street	Station				h(2) Refe		number (see instri	ictions)
Birmingham, England	126375				D(Z) Hole		ABC1234	actions)
					- 0			
						ntry under	whose laws inco	rporated
		1			UK			
d Date of incorporation	e Principal place of business	f Principal business code number	activity	g Principal busin	ess activity		h Functional cur	rency code
04/04/4000							0.51	_
01/01/1990	UK	523900		Financial Inve	stment		GBI	
2 Provide the following in	nformation for the foreign corporation's	accounting period st	tated above.					
	dentifying number of branch office or ag	ent (if any) in the	b If a U.S. in	come tax return w	as filed, ente	er:		
United States			(i) Ta	xable income or (lo	oss)	(ii) U.S. income tax	
							(after all credit	s)
c Name and address of	foreign corporation's statutory or reside	ent agent in country		l address (including			, , ,	
of incorporation				vith custody of the				oration, and
Samuel Addams			the locatio	on of such books a	na recoras, i	ii dillereni	Į.	
75 Any Street	40/075							
Birmingham, England	1263/5							
Schedule A Stoc	k of the Foreign Corporat	ion	1					
				(b) Number	of shares iss	sued and	outstanding	
(a)) Description of each class of stock		(i)	Beginning of annu			(ii) End of annu	ıal
(~)				accounting period	uı		accounting per	
Common				750			1,000	
Preferred				193,710			258,280	
Treferreu				173,710			230,200	

Schedule B Shareholders of Fore					
Part I U.S. Shareholders of For	reign Co	orporation (see instructions)			
(a) Name, address, and identifying number of shareholder	(b) D shai	Description of each class of stock held by treholder. 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	Comon		750	1,000	
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003	Class B	Preferred	193,710	258,280	
Jur	16	2 15,	202	22	
DO		VOT	FIL	E	
Part II Direct Shareholders of F	oreign (Corporation (see instructions)			
(a) Name, address, and identifying number of sha Also, include country of incorporation or formation, if applicable.		(b) Description of each class of stock h Note: This description should match t description entered in Schedule A	the corresponding	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period

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Schedule C Income Statement (see instructions)

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

				Functional Currency	U.S. Dollars
	1a	Gross receipts or sales	1a		
	b	Returns and allowances	1b		
	С	Subtract line 1b from line 1a	1c		
	2	Cost of goods sold	2		
	3	Gross profit (subtract line 2 from line 1c)	3		
Δ)	4	Dividends	4		
Income	5	Interest	5	28,862,341	42,689,456
ည်	6a	Gross rents	6a	14,988,962	22,169,741
=	b	Gross royalties and license fees	6ł		
	7	Net gain or (loss) on sale of capital assets	7		
	8a	Foreign currency transaction gain or loss—unrealized	8a		
	b	Foreign currency transaction gain or loss—realized	8b		
	9	Other income (attach statement)	9		
	10	Total income (add lines 3 through 9)	10	43,851,303	64,859,197
	11	Compensation not deducted elsewhere	11		
<u>v</u>	12a	Rents	12a	2,588,175	3,828,095
	b	Royalties and license fees	12b		
Deductions	13	Interest	13	36,977	54,692
lct	14	Depreciation not deducted elsewhere	14		
eq	15	Depletion	15		
Δ	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
	19	Net income or (loss) before unusual or infrequently occurring items, and			
Net Income		income tax expense (benefit) (subtract line 18 from line 10)	19	40,669,712	60,153,397
ဝ	20	Unusual or infrequently occurring items	20	(12,818,965)	(18,960,161)
<u>+</u>	21a	Income tax expense (benefit)—current	21a		
Š	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
šive	23a	Foreign currency translation adjustments	23a		
ens ne	b	Other	23b		
Other prehen income	С	Income tax expense (benefit) related to other comprehensive income .	23c		
Other Comprehensive Income	24	Other comprehensive income (loss), net of tax (line 23a plus line 23b less			
ဒိ		line 23c)	24		- 474

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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 accountin	annua	ıl od
1	Cash	1	8,557,500		3,281	
2a	Trade notes and accounts receivable	2a	855,858		5,006	
b	Less allowance for bad debts	2b ()
3	Derivatives	3				
4	Inventories	4				
5	Other current assets (attach statement)	5	255,108		243	3,012
6	Loans to shareholders and other related persons	6	26,569,964			
7	Investment in subsidiaries (attach statement)	7	100			
8	Other investments (attach statement)	8	57,437	3	6,820),277
9a	Buildings and other depreciable assets	9a				
b	Less accumulated depreciation	9b ()()
10a		10a				
b	Less accumulated depletion	10b ()
11	Land (net of any amortization)	11				
12	Intangible assets:					
а	Goodwill	12a				
b	Organization costs	12b				
С	Patents, trademarks, and other intangible assets	12c	11,727,492	2	1,085	5,517
d	Less accumulated amortization for lines 12a, 12b, and 12c	12d () ()
13	Other assets (attach statement)	13				
14	Total assets	14	48,023,359	7	6,436	5,862
	Liabilities and Shareholders' Equity					
15	Accounts payable	15				3,312
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	0.047.400		4.04	7.400
19	Other liabilities (attach statement)	19	2,016,428		1,247	7,422
20	Capital stock:	00-	F7 F4F 222	7	/ 70-	7 110
a	<u> </u>	20a	57,545,333		1,000	
b 21	-	20b 21	750,000		1,000	0,000
22		22				
23	Less cost of treasury stock	23	16,290,072)(7	',686,	194 \
24	Total liabilities and shareholders' equity	24	48,023,359		6,436	
	dule G Other Information		40,023,337		0,400	7,002
				1	Yes	No
1	During the tax year, did the foreign corporation own at least a 10% interest, direct	ctlv o	r indirectly, in any fore	_		
	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	e disr	egarded as separate f	from		
	their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the forei					
	branches (see instructions)?					✓
	If "Yes," you are generally required to attach Form 8858 for each entity or branch (s	ee ins	structions).			
4a	During the tax year, did the filer pay or accrue any base erosion payment unde	r sec	tion 59A(d) to the fore	eign		
	corporation or did the filer have a base erosion tax benefit under section 59A(c)(2)					
	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		\$			
С	Enter the total amount of the base erosion tax benefits					
5a	During the tax year, did the foreign corporation pay or accrue any interest or royalty			not		
	allowed under section 267A?					✓
	If "Yes," complete line 5b.		Φ.			
p	Enter the total amount of the disallowed deductions (see instructions)		ъ			

Schedule G Other Information (continued)

		Yes	No
6a	Is the filer claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any		
	transactions with the foreign corporation?		✓
L	If "Yes," complete lines 6b, 6c, and 6d. See instructions.		
D	Enter the amount of gross receipts derived from all sales of general property to the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) \$		
С	Enter the amount of gross receipts derived from all sales of intangible property to the foreign corporation that the filer included in its computation of FDDEI		
d	Enter the amount of gross receipts derived from all services provided to the foreign corporation that the filer included in its computation of FDDEI		
7	During the tax year, was the foreign corporation a participant in any cost sharing arrangement?		√
	If the answer to question 7 is "Yes," complete a separate Schedule G-1 for each cost sharing arrangement in which the foreign corporation was a participant during the tax year.		
8	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))?		√
9a	Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(d) annual income inclusion for the tax year? If "Yes," go to line 9b.		√
b	Enter in functional currency the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for the tax year		
10	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.		
11	During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations		
	section 1.6011-4?		√
12	During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		√
13	During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat		•
. •	foreign taxes that were previously suspended under section 909 as no longer suspended?		✓
14	Did you answer "Yes" to any of the questions in the instructions for line 14?		✓
	If "Yes," enter the corresponding code(s) from the instructions and attach statement Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)?		√
15	If "Yes," enter the amount		•
16	Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to		
	the current tax year (see instructions)?		✓
17a	Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year		
17 u	(see instructions)?		√
b	If the answer to question 17a is "Yes," was an election made to close the tax year such that no amount is treated		
10	as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)?		✓
18	Does the reporting corporation have any loan to or from the related party to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the		
	relevant term)?		√
19a	Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section		
	1.385-3) during the period including the tax year and the preceding 3 tax years, or, during the period beginning 36 months before the date of the respective distribution or acquisition and ending 36 months afterward, did the		
	reporting corporation issue or refinance indebtedness owed to a related party?		✓
b	If the answer to question 19a is "Yes," provide the following.		
	(1) The amount of such distribution(s) and acquisition(s)		
	(2) The amount of such related party indebtedness		

Tax Year 2022 1120 MeF ATS Scenario 3

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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		43,668,620
b	Section 245A(e)(2) subpart F income from hybrid dividends of tiered corporations (see instructions) .	1b		
С	Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c		
d	Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d		
е	Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A)	1e		
f	Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	1f		
g	Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A) .	1g		
h	Other subpart F income (enter result from Worksheet A)	1h		
2	Earnings invested in U.S. property (enter the result from Worksheet B)	2		
3	Reserved for future use	3		
4	Factoring income	4		
	See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.			
5a	Section 245A eligible dividends (see instructions)	5a		
b	Extraordinary disposition amounts (see instructions)	5b		
С	Extraordinary reduction amounts (see instructions)	5c		
d	Section 245A(e) dividends (see instructions).	5d		
е	Dividends not reported on line 5a, 5b, 5c, or 5d	5e		
6	Exchange gain or (loss) on a distribution of previously taxed earnings and profits	6		I
7a	Was any income of the foreign corporation blocked?			Yes No
b	Did any such income become unblocked during the tax year (see section 964(b))?			
If the a	answer to either question is "Yes," attach an explanation.			
8a	Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign cor	poratio	n 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			
	\$ and at the end of the tax year \$ Provide an attachment detailing	g any c	hange	es from the
	beginning to the ending balances.			
С	Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of			
	\$ and at the end of the tax year \$ Provide an attachment detailing	g any c	hange	es 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)	\$		

Tax Year 2022 1120 MeF ATS Scenario 3

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

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

OMB No. 1545-0123

Department of the Treasury

(Rev. December 2022)

Information furnished for the foreign corporation's annual accounting period (tax year required by

Attachment Sequence No. 121

Internal Revenue Service	section 898) (see instructions) b	eginning Jan 1	, 20 22	, and ending	Dec 31	, 20 2	2	
Name of person filing this re	eturn		A	Identifying number	r			
Anywork Finance Inco	prporated				00-	000000	3	
Number, street, and room or s	uite no. (or P.O. box number if mail is not de	elivered to street addres	ss) B	Category of filer (Se	e instruction	ns. Check	applicable box(es).):
35 Any Street				1a 1b 1c	2 🗸 3 🔻	7 4 🗸	5a□ 5b□ 5c	
City or town, state, and ZIP	code		С	Enter the total perc	entage of th	e foreign	corporation's vo	ting
Anytown, NY 10006				stock you owned a	t the end of	its annua	accounting peri	od 100 %
Filer's tax year beginning	January 01 , 20 2	22 , and ending	Decem	nber 31 , 2	20 22			
D Check box if this is a fina	al Form 5471 for the foreign corporation	1				7.		🗆
	pecified foreign financial assets are repo					47.		
F Check the box if this For	m 5471 has been completed using "Alte	ernative Information"	under Rev. F	Proc. 2019-40	U		<u> </u>	🗀
G If the box on line F is che	ecked, enter the corresponding code fo	r "Alternative Informa	ation" (see ins	structions)				
	alf this information return is filed:			•				
						(4)	Check applicable	e box(es)
(1) Nam	e	(2) Address		(3) Identifyin	ig number	Sharehol		Director
		4		_				
Importants Fill in all	applicable lines and schedules	a All information	n munt he	in English All	amounta	munt	he stated in	II C dollara
•	applicable lines and scriedules herwise indicated.	S. Ali iniomialioi	n must be	in English. Ali	amounts	must	be stated in	U.S. dollars
1a Name and address of					h/1\ Emn	lovor idor	atification number	r if ony
	loreign corporation				b(i) Linp	-	ntification numbe	i, ii aiiy
Foreign Sands 80 Any Street					1 (a) D (
Birmingham, England	126375				b(2) Refe		number (see insti	ructions)
Diriningriam, England	120070				_		ABC8989	
						ntry under	r whose laws inco	orporated
				activity g Principal business activity h Functional currency code				
d Date of incorporation	e Principal place of business	f Principal business code number	s activity	g Principal busine	ess activity		h Functional cu	rrency code
01/01/1990	NL	52390	0	Financial Inves	stment		EU	R
2 Provide the following in	nformation for the foreign corporation's	accounting period s	tated above.	•				
a Name, address, and ic	dentifying number of branch office or ag	ent (if anv) in the	b If a U.S. i	ncome tax return wa	as filed, ente	er:		
United States	, ,	, , , , , , , , , , , , , , , , , , , ,	(i) Ta	axable income or (lo	ss)	(ii) U.S. income ta	ıx paid
			(,, .,		33,	,	(after all credi	
c Name and address of of incorporation	foreign corporation's statutory or reside	ent agent in country		d address (including with custody of the				
•			1 1 1.	on of such books ar				oration, and
George Washington 80 Any Street								
Amsterdam, Netherlar	nds							
Sobodulo A Stoc	k of the Fareign Cornerat	ion						
Schedule A Stoc	k of the Foreign Corporat	1011		(b) Number	of charge ice	auod and	outstanding	
(6)) Description of each class of stock			. ,		sueu anu		
(a)) Description of each class of stock			Beginning of annua accounting period	al		(ii) End of ann accounting per	
Common				20,000			40,000	
Preferred				200,000			400,000	

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Schedule B Shareholders of Fore	ign Cor	poration				
Part I U.S. Shareholders of For			uctions)			
(a) Name, address, and identifying number of shareholder	(b) D sha	escription of each class of st reholder. Note: This descript natch the corresponding des entered in Schedule A, colur	ock held by on should cription	(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	Commor	FT	Δ	20,000	40,000	
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003	Preferred	1		200,000	400,000	
Jur	16		,	207		
DO		10			E	
Part II Direct Shareholders of F	oreign (Corporation (see ins	structions)			
(a) Name, address, and identifying number of sha Also, include country of incorporation or formation, if applicable.	reholder.	(b) Description of each of Note: This description description entere	should match the	corresponding	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period

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Schedule C Income Statement (see instructions)

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

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

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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		Beginning of annual accounting period	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	100	
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:			
а	Goodwill	12a		
b	Organization costs	12b		
С	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:			
а	<u> </u>	20a		
b	<u> </u>	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 S alac	Total liabilities and shareholders' equity	24	1,000,000	1,000,000
Sche	dule G Other Information			Yes No
	Divine the territory did the ferries comparation arms at least a 100/ interest dive	م برالحم	in alive able the area of a	
1	During the tax year, did the foreign corporation own at least a 10% interest, direct partnership?			
	If "Yes," see the instructions for required statement.	•		
2	During the tax year, did the foreign corporation own an interest in any trust?			
3	During the tax year, did the foreign corporation own any foreign entities that were their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign			
	branches (see instructions)?			
	If "Yes," you are generally required to attach Form 8858 for each entity or branch (s			
4a	During the tax year, did the filer pay or accrue any base erosion payment unde		,	reign
₹a	corporation or did the filer have a base erosion tax benefit under section 59A(c)(2)			
	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 benefits		\$	
5a	During the tax year, did the foreign corporation pay or accrue any interest or royalty			s not
Ju	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 claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any		
	transactions with the foreign corporation?		✓
L	If "Yes," complete lines 6b, 6c, and 6d. See instructions.		
D	Enter the amount of gross receipts derived from all sales of general property to the foreign corporation that the filer included in its computation of foreign-derived deduction eligible income (FDDEI) \$		
С	Enter the amount of gross receipts derived from all sales of intangible property to the foreign corporation that the filer included in its computation of FDDEI		
d	Enter the amount of gross receipts derived from all services provided to the foreign corporation that the filer included in its computation of FDDEI		
7	During the tax year, was the foreign corporation a participant in any cost sharing arrangement?		√
	If the answer to question 7 is "Yes," complete a separate Schedule G-1 for each cost sharing arrangement in which the foreign corporation was a participant during the tax year.		
8	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))?		√
9a	Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(d) annual income inclusion for the tax year? If "Yes," go to line 9b.		√
b	Enter in functional currency the amount of the earnings and profits reduction pursuant to section 367(d)(2)(B) for the tax year		
10	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.		
11	During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations		
	section 1.6011-4?		√
12	During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		√
13	During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat		•
. •	foreign taxes that were previously suspended under section 909 as no longer suspended?		✓
14	Did you answer "Yes" to any of the questions in the instructions for line 14?		✓
	If "Yes," enter the corresponding code(s) from the instructions and attach statement Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)?		√
15	If "Yes," enter the amount		•
16	Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to		
	the current tax year (see instructions)?		✓
17a	Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year		
17 u	(see instructions)?		√
b	If the answer to question 17a is "Yes," was an election made to close the tax year such that no amount is treated		
10	as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)?		✓
18	Does the reporting corporation have any loan to or from the related party to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the AFR for the		
	relevant term)?		√
19a	Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section		
	1.385-3) during the period including the tax year and the preceding 3 tax years, or, during the period beginning 36 months before the date of the respective distribution or acquisition and ending 36 months afterward, did the		
	reporting corporation issue or refinance indebtedness owed to a related party?		✓
b	If the answer to question 19a is "Yes," provide the following.		
	(1) The amount of such distribution(s) and acquisition(s)		
	(2) The amount of such related party indebtedness		

Tax Year 2022 1120 MeF ATS Scenario 3

Form 5471 (Rev. 12-2022)

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			
С	Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c		160	0,000
d	Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d			
е	Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A)	1e			
f	Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	1f			
g	Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A) .	1g			
h	Other subpart F income (enter result from Worksheet A)	1h			
2	Earnings invested in U.S. property (enter the result from Worksheet B)	2			
3	Reserved for future use	3			
4	Factoring income	4			
	See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.				
5a	Section 245A eligible dividends (see instructions)	5 a			
b	Extraordinary disposition amounts (see instructions)	5b			
С	Extraordinary reduction amounts (see instructions)	5c			
d	Section 245A(e) dividends (see instructions).	5d			
е	Dividends not reported on line 5a, 5b, 5c, or 5d	5e			
6	Exchange gain or (loss) on a distribution of previously taxed earnings and profits	6			
				Yes	No
7a	Was any income of the foreign corporation blocked?				
b	Did any such income become unblocked during the tax year (see section 964(b))?				
It the a	answer to either question is "Yes," attach an explanation.				
8a	Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign con				
	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				
	\$ and at the end of the tax year \$ Provide an attachment detailin	g any	change	es fror	n the
	beginning to the ending balances.				
С	Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of				
	\$ and at the end of the tax year \$ Provide an attachment detailin	g any	cnange	es tror	n the
•	beginning to the ending balances.	Φ.			
9	Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions)	\$			

OMB No. 1545-0123

Tax Year 2022
1120 MeF ATS Scenario 3
Income, War Profits, and Excess Profits Taxes Paid or Accrued

(Rev. December 2021) (Form 5471)

September 13, 2022 SCHEDULE E

Department of the Treasury Internal Revenue Service Name of person filing Form 54

ecember 2021)	▶ Attach to Form 5471.	OMB
ment of the Treasury I Revenue Service	► Go to www.irs.gov/Form5471 for instructions and the latest information.	
of person filing Form 5471		Identifying number
ork Finance Incorporated	ed)00-00
of foreign corporation	EIN (if anv)	Reference ID number

Anywo	Anywork Finance Incorporated					00-000003
Name of	Name of foreign corporation			EIN (if any)	Refere	Reference ID number (see instructions)
Foreigr	Foreign Finance Corporation			00-000045	00045	ABC1234
a	Separate Category (Enter code—see instructions.)	ctions.)				GEN
q	If code 901j is entered on line a, enter the country code for the	country code for the sanctioned	sanctioned country (see instructions)	uctions)		
O	If one of the RBT codes is entered on line a, enter the country	a, enter the country code for the	code for the treaty country (see instructions)	e instructions)		
Part	Taxes for Which a Foreign Tax Credit Is Allowed	Credit Is Allowed				
Section 1	on 1 — Taxes Paid or Accrued Directly by Foreign Corporati	Foreign Corporation				
	(a) Namo of Door Entity	(b) ElN or Reference	(c) ence Unsuspended	Country or U.S. Possession to Which Tax Is Paid	(e) Foreign Tax Year of Payor	U.S. Tax Year of Payor Entity
	Name of Payor Entity	ID Number of Payor Entity		(Enter code—see instructions. Use a separate line for each.)	Entity to Which Tax Relates (Year/Month/Day)	
-	Foreign Finance Corporation	00-000045	45	UK	2021/01/01	2021/12/31
7						
က						
4						
	(g) Income Subject to Tax If taxes are paid on in the Foreign Jurisdiction U.S. source income.	(i) Local Currency in Which Tax Is Pavable	(j) Tax Paid or Accrued fin local currency in which	-	(f) In U.S. Dollars (divide column (i)	(m) In Functional Currency
		(ente	the tax is payable)	to U.S. Dollars	by column (k))	of Foreign Corporation
-	0	GBP	596'1	7,969,922	11,788,082	7,969,922
7						
ဇ						
4						
2	Total (combine lines 1 through 4 of column (I)). Also report am	(I)). Also report amount on Sch	ount on Schedule E-1, line 4.		11,788,082	32
9	Total (combine lines 1 through 4 of column (m))	(m)				7,969,922
Sectio	Section 2 - Taxes Deemed Paid by Foreign Corporation					
	(a) Name of Lower-Tier Distributing Foreign Corporation	(b) EIN or Reference ID Number of Lower-Tier Number of Lower-Tier Distributing Foreign Corporation		(c) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	aid (d) PTEP Group (enter code)	(enter year)
-						
8						
က						
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 (ii)/column (ii)) (USD)
-						
8						
ო						
4						
2	Total (combine lines 1 through 4 of column (i)). Also report am	(i)). Also report amount on Sch	ount on Schedule E-1, line 6.		•	
For Pa	For Paperwork Reduction Act Notice, see instructions.	Š.	Cat. No.	Cat. No. 71397A	Sche	Schedule E (Form 5471) (Rev. 12-2021)

Version A, Cycle 8

1120 MeF ATS Scenario 3 Tax Year 2022

September 13, 2022

00-000045 EIN (if any) Schedule E (Form 5471) (Rev. 12-2021) Foreign Finance Corporation Name of foreign corporation

Reference ID number (see instructions) GEN ABC1234 c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) **b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions). a Separate Category (Enter code-see instructions.) 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 ▶

Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)	(a) (b) (c) (d) (e) (f) (g) (h) (i) (i) (i) (i) (i) (i) (ii) (ii) (ii) (iii) (iii) (iiii) (iiii) (iiiii) (iiiii) (iiiiiiii) (iiiiiiiiiii) (iiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiii			sy (combine lines 1 and 2)	slated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions))	Schodillo 3.4 Tayes Daid Accrised or Deemed Daid on Farnings and Profits (F&D) of Foreign Compression
	(a) EIN o ID Name of Payor Entity of Pt			In functional currency (combine lines 1 and 2) .	In U.S. dollars (translated at the average exchange rate,	Tayee Daid Accrised or De
Part III		-	2	က	4	School

dollars.
n U.S.
amounts ii
Enter
RTANT
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Taxes related to:

α ο ο α σ	Balance at beginning of year (as reported in prior year Schedule E-1)			200	
		•			
		-	o o	0-	
	Beginning balance adjustments (attach statement)				
	Adjusted beginning balance (combine lines 1a and 1b)				
	Adjustment for foreign tax redetermination				
Δ I	Taxes unsuspended under anti-splitter rules				
	Taxes suspended under anti-splitter rules				
	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)	11,788,082			
	Taxes carried over in nonrecognition transactions				
	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i)				
l	Other adjustments (attach statement)				
8 Taxes paid or acc	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c				
through 7)		11,788,082			
9 Taxes deemed pai	Taxes deemed paid with respect to inclusions (see instructions)				
10 Taxes deemed pa	Taxes deemed paid with respect to actual distributions				
11 Taxes on amounts	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
12 Other (attach statement)	ement)				
13 Balance of taxes	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))				
14 Reserved for futur	Reserved for future use				
15 Reduction for other	Reduction for other taxes not deemed paid				
Balance of taxes pand (c) must alway	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of				
zero. For the rema	columns (a), (b), and (c) in amounts sumicient to reduce fine 1s, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12	0-	-0-	-0-	
				Schedule E (F	Schedule E (Form 5471) (Rev. 12-2021)

September 13, 2022 Schedule E (Form 5471) (Rev. 12-2021)

Schedule	Schedule F (Form 5471) (Rev. 12-2021)	12-2021)		•		2000				C edge
Name of	Name of foreign corporation						EIN (if any)		Reference ID number (see instructions)	er (see instructions)
Foreign	Foreign Finance Corporation	ion					00-00	00-0000045	ABC	ABC1234
a	Separate Category (Enter code—see instructions.)	ry (Enter code—s	see instructions.)						A	GEN
q	If code 901j is en	tered on line a, e	inter the country c	sode for the sanct	If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) .	e instructions) .			.	
ပ	If one of the RBT	codes is entered	d on line a, enter t	he country code f	If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)	try (see instructio	ns) (su		.	
Sche	Schedule E-1 Ta	xes Paid, Accı	Taxes Paid, Accrued, or Deemed Paid on	ed Paid on Acc	Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued)	ngs and Profits	(E&P) of Fore	ign Corporatio	n (continued)	
				(e) Taxes	(e) Taxes related to previously taxed E&P (see instructions)	usly taxed E&P (see instructions)			
	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
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16										

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

OMB No. 1545-0123

Tax Year 2022

1120 MeF ATS Scenario 3

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

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

September 13, 2022

SCHEDULE E (Form 5471) ► Attach to Form 5471.

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

200,000 200,000 U.S. Tax Year of Payor Entity to Which Tax Relates Reference ID number (see instructions) Annual PTEP Account In Functional Currency of Foreign Corporation Foreign Income Taxes Properly Attributable (column (f)/column (g)) x column (h)) (USD) to PTEP and not Previously Deemed Paid (Year/Month/Day) (enter year) 2021/12/31 GEN Ξ 00-000003 **ABC8989** Identifying number 200,000 200,000 PTEP Group A Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day) (enter code) ত্র (divide column (j) In U.S. Dollars by column (k)) 2021/01/01 (Enter code—see instructions. Use a separate line for each.) 00-000046 Δ Country or U.S. Possession to Which Tax Is Paid Total Amount of the PTEP Group Taxes 1.00000 With Respect to PTEP Group (USD) to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.) (d) Country or U.S. Possession Conversion Rate to U.S. Dollars EIN (if any) Z If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) 3 If code 901 j is entered on line a, enter the country code for the sanctioned country (see instructions) 200,000 Tax Paid or Accrued (in local currency in which the tax is payable) Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 **Unsuspended** Total (combine lines 1 through 4 of column (I)). Also report amount on Schedule E-1, line 4 <u>ပ</u> (g)
Total Amount of PTEP in the PTEP Group (b)
EIN or Reference ID
Number of Lower-Tier
Distributing Foreign
Corporation EIN or Reference of Payor Entity 00-0000046 ID Number (in functional currency) 9 (enter code—see instructions) Which Tax Is Payable Local Currency in EUR Section 1 - Taxes Paid or Accrued Directly by Foreign Corporation Taxes for Which a Foreign Tax Credit Is Allowed Section 2 — Taxes Deemed Paid by Foreign Corporation (a)
Name of Lower-Tier Distributing Foreign Corporation Separate Category (Enter code - see instructions.) Total (combine lines 1 through 4 of column (m)) U.S. source income, If taxes are paid on (a) Name of Payor Entity check box (enter amount in functional currency) PTEP Distributed 1,000,000 in the Foreign Jurisdiction Anywork Finance Incorporated Income Subject to Tax (see instructions) Name of person filing Form 5471 Name of foreign corporation Foreign Sands Foreign Sands Partl a 9 ო က က က Ŋ S 4 2 4 S S 4 2 4

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

Version A, Cycle 8

Page 2

Tax Year 2022 1120 MeF ATS Scenario 3

September 13, 2022 Schedule E (Form 5471) (Rev. 12-2021)

Name of	Name of foreign corporation	EIN (if any)	Reference	Reference ID number (see instructions)
Foreigi	Foreign Sands	00-000046		ABC8989
В	Separate Category (Enter code—see instructions.)			GEN
Q	If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions).			
Part	Election	(6110112		
Forta	visase hadining after December 31, 2007, has an election been made under section 086/2/(1/0) to the	Jove odt paisu sevet etclaner	ob odt ao oter opaer	to of naymont?
ا اع	rol tax years beginning after becentiber 31, 2004; has an election been made under section 900(a)(b) to trainstate taxes using the exchange rate on the date of election ▼	ialisiate taxes using the exci	ומווטפ ומנפ טוו נוופ טמ	te oi payment:
Part III	Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)	foreign corporation.)	_	
	(a) (b) (c) Section 901 (f) Section 901 (f) Section 901 (m) and (l)	U.S. Taxes	Suspended Other Taxes	(i) Total
-				
7				
ω 4	In functional currency (combine lines 1 and 2). In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions).	equiations (see instructions))		A A
Sche	Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation	oreign Corporation		-
MPOL	IMPORTANT: Enter amounts in 11 S. dollars	Тахе	Taxes related to:	
		(a) (b) Subpart Fincome	(c) Residual Income	(d) Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1).		0-	
q	Beginning balance adjustments (attach statement)			
ပ	Adjusted beginning balance (combine lines 1a and 1b)			
7	Adjustment for foreign tax redetermination			
3a	Taxes unsuspended under anti-splitter rules			
Q	Taxes suspended under anti-splitter rules			
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)	200,000		
2	Taxes carried over in nonrecognition transactions			
9	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i)			
7	Other adjustments (attach statement)			
ω	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)			
6	Taxes deemed paid with respect to inclusions (see instructions)	140,000		
9	Taxes deemed paid with respect to actual distributions			
F	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P			
12	Other (attach statement)	000'09		
13	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))			
4	Reserved for future use			
15	Reduction for other taxes not deemed paid			
16	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of			
	columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12	-0-	-0-	
			Schedule	Schedule E (Form 5471) (Rev. 12-2021)

September 13, 2022 Schedule E (Form 5471) (Rev. 12-2021)

(x) Section 951(a)(1)(A) PTEP Reference ID number (see instructions) GEN ABC8989 (ix) Section 245A(d) PTEP Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued) (viii) Section 951A PTEP 00-0000046 (vii) Section 965(b) PTEP (e) Taxes related to previously taxed E&P (see instructions) EIN (if any) If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions). (vi) Section 965(a) PTEP (v)

Reclassified
section 245A(d) (iv)
Reclassified
section 951A
PTEP 5 a Separate Category (Enter code-see instructions.) (iii) General section 959(c)(1) PTEP Reclassified section 965(b) 25,000 25,000 150,000 150,000 Name of foreign corporation (i) Reclassified section 965(a) PTEP Schedule E-1 Foreign Sands ပ Q 3a <u>a</u> ပ Q ผ Ŋ 9 ω 6 4 7 우 14 15 Ŧ 42 5

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

OMB No. 1545-0123

Identifying number

Tax Year 2022

1120 MeF ATS Scenario 3

September 13, 2022

SCHEDULE E Form 5471)

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

Department of the Treasury Internal Revenue Service

Name of person filing Form 5471

(Rev. December 2021)

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

40,000 40,000 Schedule E (Form 5471) (Rev. 12-2021) U.S. Tax Year of Payor Entity to Which Tax Relates Reference ID number (see instructions) Annual PTEP Account In Functional Currency of Foreign Corporation Foreign Income Taxes Properly Attributable (column (f)/column (g)) x column (h)) (USD) to PTEP and not Previously Deemed Paid (Year/Month/Day) (enter year) 2021/12/31 PAS Ξ 00-000003 **ABC8989** 40,000 40,000 PTEP Group Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day) A (enter code) ত্র (divide column (j) In U.S. Dollars by column (k)) 2021/12/31 (Enter code—see instructions. Use a separate line for each.) 00-000046 Δ Country or U.S. Possession to Which Tax Is Paid Total Amount of the PTEP Group Taxes 1.00000 With Respect to PTEP Group (USD) to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.) (d) Country or U.S. Possession Conversion Rate to U.S. Dollars EIN (if any) Z If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) 3 If code 901 j is entered on line a, enter the country code for the sanctioned country (see instructions) Cat. No. 71397A 40,000 Tax Paid or Accrued (in local currency in which the tax is payable) Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 **Unsuspended** Total (combine lines 1 through 4 of column (I)). Also report amount on Schedule E-1, line 4 <u>ပ</u> (g)
Total Amount of PTEP in the PTEP Group (b)
EIN or Reference ID
Number of Lower-Tier
Distributing Foreign
Corporation EIN or Reference of Payor Entity 00-0000046 ID Number (in functional currency) 9 (enter code—see instructions) Which Tax Is Payable Local Currency in EUR Section 1 - Taxes Paid or Accrued Directly by Foreign Corporation Taxes for Which a Foreign Tax Credit Is Allowed Section 2 — Taxes Deemed Paid by Foreign Corporation (a)
Name of Lower-Tier Distributing Foreign Corporation Separate Category (Enter code - see instructions.) Total (combine lines 1 through 4 of column (m)) For Paperwork Reduction Act Notice, see instructions. U.S. source income, If taxes are paid on check box (a) Name of Payor Entity (enter amount in functional currency) PTEP Distributed in the Foreign Jurisdiction Anywork Finance Incorporated Income Subject to Tax (see instructions) Name of foreign corporation Foreign Sands Foreign Sands Partl a 9 ო က က က Ŋ S 4 N 4 S 9 S 4 N 4

September 13, 2022 Schedule E (Form 5471) (Rev. 12-2021)

scheduk	schedule E (Form 5471) (Rev. 12-2021)				Page 2
lame of	Name of foreign corporation	EIN (if any)		Reference ID nur	Reference ID number (see instructions)
oreigr	oreign Sands	0-00	00-0000046	AE	ABC8989
В	Separate Category (Enter code—see instructions.)			▲	PAS
Q	If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions).			▲	
ပ	one	ictions)			
Part III	Election				
or ta	or 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 ▶	translate taxes using 	the exchange ra	ite on the date o	f payment?
Part III	III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)	f foreign corporati	on.)		
			(g)	(1)	(9)
	ID Number Section 901() and () and ()		Taxes	Other	Total
_					
7					
ი -	In functional currency (combine lines 1 and 2)				
4 Sche	4 In U.S. dollars (translated at the average exchange rate, as defined in section 968(b)(s) and related regulations (see instructions)) Schedule E-I Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation	egulations (see instra- oreign Corporation	on		
MDOF	ter emounts in 11 S. dollars		Taxes related to:	d to:	
		(a) Subpart Flocome	(b) Tested Income	(c) Besidual Income	(d) Suspended Taxes
,					
ھ ح	Balance at beginning of year (as reported in prior year schedule E-1)	-	-	þ	
2 0	Adjusted beginning balance (combine lines 1a and 1b)				
0	Adjustment for foreign tax redetermination				
3a	Taxes unsuspended under anti-splitter rules				
Q	Taxes suspended under anti-splitter rules				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)	40,000			
2	Taxes carried over in nonrecognition transactions				
9	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i)				
7	Other adjustments (attach statement)				
œ	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c				
	through 7)				
စ	Taxes deemed paid with respect to inclusions (see instructions)	40,000			
9	Taxes deemed paid with respect to actual distributions				
F	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
12	Other (attach statement)				
13	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))				
14	Reserved for future use				
12	Reduction for other taxes not deemed paid				
16	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b),				
	and (c) fillust always equal zero. So, it recessary, effect flegative afformits of filler 13 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12.	Ċ	Ċ	Ċ	
				Schedule E (Fo	Schedule E (Form 5471) (Rev. 12-2021)

September 13, 2022

(x) Section 951(a)(1)(A) PTEP Reference ID number (see instructions) PAS ABC8989 (ix) Section 245A(d) PTEP Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued) (viii) Section 951A PTEP 00-0000046 (e) Taxes related to previously taxed E&P (see instructions) (vii) Section 965(b) PTEP EIN (if any) If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions). (vi) Section 965(a) PTEP (V)
| Reclassified section 245A(d) | PTEP | (iv)
Reclassified
section 951A
PTEP 5 a Separate Category (Enter code-see instructions.) (iii) General section 959(c)(1) PTEP Reclassified section 965(b) PTEP Schedule E (Form 5471) (Rev. 12-2021) Name of foreign corporation (i) Reclassified section 965(a) PTEP Schedule E-1 Foreign Sands ပ Q 3a <u>a</u> ပ Q ผ Ŋ 9 ω 6 4 7 우 14 15 Ŧ 42 5

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

September 13, 2022 SCHEDULE H

1120 MeF ATS Scenario 3 **Current Earnings and Profits**

Tax Year 2022

► Attach to Form 5471.

OMB No. 1545-0123

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

(Form 5471)

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

Name of person filing Form 5471 Identifying number Anywork Finance Incorporated 00-000003 Name of foreign corporation EIN (if any) Reference ID number (see instructions) ABC1234 Foreign Finance Corporation 00-0000045 IMPORTANT: Enter the amounts on lines 1 through 5c in functional currency. Current year net income or (loss) per foreign books of account 27,850,747 2 Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax **Net Additions Net Subtractions** accounting standards (see instructions): 2a Depreciation and amortization 2b 2c 2d Investment or incentive allowance 355,647 Charges to statutory reserves 2e Inventory adjustments 2f f Income taxes (see Schedule E, Part I, Section 1, line 6, column (m), and Part III, line 3, column (i)) 2g 113.140 Foreign currency gains or losses . . . 2h i Other (attach statement) . . . 2i 1,946,284 3 Total net additions . . . 2,301,931 Total net subtractions 4 4 628,324 5a 29,524,354 **b** DASTM gain or (loss) for foreign corporations that use DASTM (see instructions) . . . 5b 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)(D) the portion of the line 5c amount with respect to the categories of income shown 5c 29,524,354 (i) General category (enter amount on applicable Schedule J, Part I, 5c(i) 29,524,354 (ii) Passive category (enter amount on applicable Schedule J, Part I, 5c(ii) (iii) Section 901(i) category: 5c(iii)(A)

(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)
(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.
- (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,
- (D) 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)(D) and on the applicable Schedule J,
- 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)) e Enter exchange rate used for line 5d

1120 MeF ATS Scenario 3 Current Earnings and Profits

Tax Year 2022

Attach to Form 5471.

OMB No. 1545-0123

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

(Form 5471)

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

Name of person filing Form 5471

Anywork Finance Incorporated

Name of foreign corporation

EIN (if any)

Foreign Sands

Identifying number

00-000003

Reference ID number (see instructions)

Foreig	n Sands		00	0-0000046			
IMPO	RTANT: Enter the amounts on lines 1 through 5c in function	onal c	currency.				
1	Current year net income or (loss) per foreign books of acc	count				1	960,000
2	Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):		Net Ad	ditions	Net Subtractions		
а	Capital gains or losses	2a					
b	Depreciation and amortization	2b					
С	Depletion	2c					
d	Investment or incentive allowance	2d					
е	Charges to statutory reserves	2e					
f	Inventory adjustments	2f					
g	Income taxes (see Schedule E, Part I, Section 1, line 6, column (m), and Part III, line 3, column (i))	0~					
h	Foreign currency gains or losses	2g 2h					
i	Other (attach statement)	2i				1	
3	Total net additions	3				1	
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 DA	ASTM	(see instru	ctions)		5b	
С	Combine lines 5a and 5b and enter the result on line 5c.	Then	enter on li	nes 5c(i),	5c(ii), and 5c(iii)(A)		
	through 5c(iii)(D) the portion of the line 5c amount with I						
	on those lines					5c	960,000
	(i) General category (enter amount on applicable Sche			F = (:)			
	line 3, column (a))			5c(i)	800,00	00	
	(ii) Passive category (enter amount on applicable Scheline 3, column (a))	edule 	J, Part 1,	5c(ii)	160,00	00	
	(A) Enter the country code of the sanctioned country	•					
	and enter the line 5c amount with respect to t country on this line 5c(iii)(A) and on the applicab	the sa					
	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 t country on this line 5c(iii)(B) and on the applicab Part I, line 3, column (a)	le Scl	hedule J,	5 - (:::\/D\			
	(C) Enter the country code of the sanctioned country			5c(iii)(B)			
	and enter the line 5c amount with respect to t		notioned				
	country on this line 5c amount with respect to to country on this line 5c(iii)(C) and on the applicab Part I, line 3, column (a)	le Scl	hedule J,	5c(iii)(C)			
	(D) Enter the country code of the sanctioned country			, = (,()			
	and enter the line 5c amount with respect to t		anctioned				
	country on this line 5c(iii)(D) and on the applicab	le Scl	hedule J,				
	Part I, line 3, column (a)			5c(iii)(D)			
d	Current earnings and profits in U.S. dollars (line 5c tra			_	•		
	defined in section 989(b)(3) and the related regulations (se					5d	960,000
е	Enter exchange rate used for line 5d			▶	1.000000	001	

Tax Year 2022 1120 MeF ATS Scenario 3

SCHEDULĖ I-1 (Form 5471)

Information for Global Intangible Low-Taxed Income

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

(Rev. December 2021)

Department of the Treasury Internal Revenue Service ► Attach to Form 5471.

OMB No. 1545-0123

Name of person filing Form 5471 Identifying number Anywork Finance Incorporated 00-000003 Name of foreign corporation Reference ID number (see instructions) EIN (if any) Foreign Sands 00-0000046 ABC8989 Separate Category (Enter code-see instructions.) GEN **Functional** Conversion U.S. Dollars Currency Rate 1 Gross income (see instructions if cost of goods sold exceed gross 2,000,000 2 Exclusions (see instructions if cost of goods sold exceed gross receipts) Effectively connected income Subpart F income High-tax exception income per section 954(b)(4) **d** Related party dividends 2d Foreign oil and gas extraction income 3 Total exclusions (combine lines 2a through 2e) . 0 Gross income less total exclusions (line 1 minus line 3) (see 4 4 2.000.000 5 Deductions properly allocable to amount on line 4 5 1,200,000 6 6 800,000 1.0 800,000 Tested income (loss) (line 4 minus line 5) (see instructions) . . . 7 7 200,000 1.0 200,000 100,000 100,000 8 Qualified business asset investment (QBAI) . . . 8 1.0 9a Interest expense included on line 5 . . Qualified interest expense Tested loss QBAI amount 9с Tested interest expense (line 9a minus the sum of line 9b and line 9d Interest income included in line 4 . . . 10a 10a **b** Qualified interest income 10b c Tested interest income (line 10a minus line 10b). If zero or less,

For Paperwork Reduction Act Notice, see instructions.

Cat. No. 71400M

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Schedule I-1 (Form 5471) (Rev. 12-2021)

Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation September 13, 2022 SCHEDULE J

(Form 5471)

(Rev. December 2020)

Department of the Treasury Internal Revenue Service Name of person filing Form 5471

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

OMB No. 1545-0123

;							
Name	Name of person filing Form 5471					Identifying number	ber
Any	Anywork Finance Incorporated					.00	00-000003
Name	Name of foreign corporation			EIN (if any)		Reference ID nu	Reference ID number (see instructions)
Fore	Foreign Finance Corporation				00-0000045	Α Α	ABC1234
a	Separate Category (Enter code - see instructions.)						GEN
q	If coc	de for the sanctione	ed country (see instruc	tions)			
Pa	Part I Accumulated E&P of Controlled Foreign Corporati	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)	s. shareholders' info	rmation to complete a	n amount in columr	(e) (see instructions		
lmpc	Important: Enter amounts in functional currency.		(b)	(c)	(d)	(e) Previously Taxed	(e) Previously Taxed E&P (see instructions)
		Previously Taxed (post-2017 section 959(c)(3) balance)	Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	Hovering Deficit and Deduction for Suspended Taxes	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP
<u>1</u> a	Balance at beginning of year (as reported on prior year Schedule J)			69,100,775			
q	Beginning balance adjustments (attach statement)						
ပ	Adjusted beginning balance (combine lines 1a and 1b)			69,100,775			
2a							
q	Disallowed deduction for taxes suspended under anti-splitter rules	7	777	1, 6	70		
က	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			Ī			
5a	_						
q							
g	nonrecognition transaction						
_	Total current and accumulated E&P (combine lines						
	1c through 6)	29,524,354		69,100,775			
œ	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P	-29,524,354	-				
6	Actual distributions						
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P						
Ξ	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)						
4	Balance at beginning of next year (combine lines 7 through 13)			69,100,775			
							l

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

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

Page 2

September 13, 2022 Schedule J (Form 5471) (Rev. 12-2020)

69,100,775 98,625,129 98,625,129 69,100,775 29,524,354 (f)
Total Section 964(a) E&P
(combine columns (a), (b), (c),
and (e)(i) through (e)(x)) (vii) Section 965(b) PTEP 29,524,354 29,524,354 (vi) Section 965(a) PTEP (x) Section 951(a)(1)(A) PTEP (e) Previously Taxed E&P (see instructions) (v) Reclassified section 245A(d) PTEP (e) Previously Taxed E&P (see instructions) Accumulated E&P of Controlled Foreign Corporation (continued) (ix) Section 245A(d) PTEP (iv) Reclassified section 951A PTEP (viii) Section 951A PTEP (iii) General section 959(c)(1) PTEP Part I 2a 5 4 5 Q ပ Q 5a Q ပ þ 2a က 4 9 9 ∞ 6 5 = <u>ද</u> 4 ω 6 9 Ξ 7 12 7 ² 단 ⁴

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

September 13, 2022 Schedule J (Form 5471) (Rev. 12-2020)

Part II	II Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))			
lmpo	Important: Enter amounts in functional currency.			
-	Balance at beginning of year			
8	Additions (amounts subject to future recapture)			
ო	Subtractions (amounts recaptured in current year)	က		
4	Balance at end of year (combine lines 1 through 3)			
		Š	Schedule J (Form 5471) (Rev. 12-2020)	-202

Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation September 13, 2022 SCHEDULE J

(Form 5471)

(Rev. December 2020)

Department of the Treasury Internal Revenue Service Name of person filing Form 5471

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

OMB No. 1545-0123

Nam	Name of person filing Form 5471					Identifying number	umber
AIIS	Anywork Finance incorporated			-		00	-0000003
Name	Name of foreign corporation			EIN (if any)		Reference ID no	Reference ID number (see instructions)
For	Foreign Sands				00-000046	◀	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)	e for the sanctione	d country (see instruc	ions) (suoi		·	
T	Part I Accumulated E&P of Controlled Foreign Corporation	Sorporation					
	Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions)	. shareholders' info	rmation to complete ar	amount in columr	(e) (see instructions	()	
lmp	Important: Enter amounts in functional currency.	(a)	(b)	(c)	(b)	(e) Previously Taxed	(e) Previously Taxed E&P (see instructions)
		Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	Hovering Deficit and Deduction for Suspended Taxes	(i) Reclassified section 965(a) PTEP	<i>(ii)</i> Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)					000'000'8	
	b Beginning balance adjustments (attach statement)						
	c Adjusted beginning balance (combine lines 1a and 1b)					3,000,000	
2a	a Reduction for taxes unsuspended under anti-splitter rules						
_	b Disallowed deduction for taxes suspended under anti-splitter rules.	7		7 -	70'		
က	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H).	000'008					
4	E&P attributable to distributions of previously taxed						
5a	_)				
	b Reclassify deficit in E&P as hovering deficit after						
ď							
0	T						
7	Total current and accumulated E&P (combine lines 1c through 6)	800,000				3,000,000	
œ	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P	000'00L-					
6	Actual distributions					000'000'8-	
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P						
÷	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)						
4	Balance at beginning of next year (combine lines 7 through 13)	100,000				0	

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

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

Page 2

September 13, 2022 Schedule J (Form 5471) (Rev. 12-2020)

Tax Year 2022 1120 MeF ATS Scenario 3

800,000 Schedule J (Form 5471) (Rev. 12-2020) 3,500,000 800,000 -3,500,000 500,000 500,000 3,500,000 4,300,000 500,000 -500,000 (f)
Total Section 964(a) E&P
(combine columns (a), (b), (c),
and (e)(i) through (e)(x)) (vii) Section 965(b) PTEP (vi) Section 965(a) PTEP (x) Section 951(a)(1)(A) PTEP (e) Previously Taxed E&P (see instructions) (v) Reclassified section 245A(d) PTEP (e) Previously Taxed E&P (see instructions) Accumulated E&P of Controlled Foreign Corporation (continued) (ix) Section 245A(d) PTEP (iv) Reclassified section 951A PTEP 700,000 700,000 (viii) Section 951A PTEP (iii) General section 959(c)(1) PTEP Part I 2a 5 4 5 Q ပ Q 5a 9 ပ þ 2a က 4 9 9 ∞ 6 5 = <u>ද</u> 4 ω 6 9 Ξ 7 12 7 ² 단 ⁴

September 13, 2022 Schedule J (Form 5471) (Rev. 12-2020)

Part II	II Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))			
lmpo	Important: Enter amounts in functional currency.			
-	Balance at beginning of year			
8	Additions (amounts subject to future recapture)			
ო	Subtractions (amounts recaptured in current year)	က		
4	Balance at end of year (combine lines 1 through 3)			
		Š	Schedule J (Form 5471) (Rev. 12-2020)	-202

Tax Year 2022

1120 MeF ATS Scenario 3

Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation September 13, 2022 SCHEDULE J

(Form 5471)

Rev. December 2020)

Department of the Treasury

Name of person filing Form 5471 Internal Revenue Service

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

OMB No. 1545-0123

(iii) Reclassified section Reference ID number (see instructions) (e) Previously Taxed E&P (see instructions) 965(b) PTEP PAS 00-000003 **ABC8989** Identifying number (i) Reclassified section 965(a) PTEP Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions) Hovering Deficit and Suspended Taxes Deduction for 00-000046 ਉ EIN (if any) Previously Taxed (pre-1987 section 959(c)(3) balance) Pre-1987 E&P Not If code 901 is entered on line a, enter the country code for the sanctioned country (see instructions) (post-1986 and pre-2018 section 959(c)(3) balance) **Undistributed Earnings** Post-1986 0 160,000 160,000 -160,000 Previously Taxed (post-2017 section 959(c)(3) balance) Post-2017 E&P Not Accumulated E&P of Controlled Foreign Corporation taxed post-Disallowed deduction for taxes suspended under after Total current and accumulated E&P (combine lines Amounts reclassified to section 959(c)(2) E&P from Amounts reclassified to section 959(c)(1) E&P from Balance at beginning of year (as reported on prior Amounts included as earnings invested in U.S. property Current year E&P (or deficit in E&P) (enter amount Balance at beginning of next year (combine lines 7 through 13) 2a Reduction for taxes unsuspended under anti-splitter rules Separate Category (Enter code—see instructions.) c Adjusted beginning balance (combine lines 1a and 1b) and reclassified to section 959(c)(1) E&P (see instructions) b Beginning balance adjustments (attach statement) Reclassify deficit in E&P as hovering deficit E&P carried over in nonrecognition transaction E&P attributable to distributions of previously offset of undistributed Important: Enter amounts in functional currency. Other adjustments (attach statement) . Other adjustments (attach statement) . from applicable line 5c of Schedule H). E&P from lower-tier foreign corporation transaction E&P (see instructions) nonrecognition transaction Anywork Finance Incorporated Actual distributions . section 959(c)(2) E&P section 959(c)(3) E&P anti-splitter rules . deficit vear Schedule J). Name of foreign corporation 1c through 6). Hovering Foreign Sands 9 **5**a 14 ဖ ω 6 9 42 5

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

Cat. No. 21111K

Page 2

September 13, 2022 Schedule J (Form 5471) (Rev. 12-2020)

eptember 13, 2022

160,000 160,000 160,000 (f)
Total Section 964(a) E&P
(combine columns (a), (b), (c),
and (e)(i) through (e)(x)) (vii) Section 965(b) PTEP 160,000 160,000 (vi) Section 965(a) PTEP (x) Section 951(a)(1)(A) PTEP (e) Previously Taxed E&P (see instructions) (v) Reclassified section 245A(d) PTEP (e) Previously Taxed E&P (see instructions) Accumulated E&P of Controlled Foreign Corporation (continued) (ix) Section 245A(d) PTEP (iv) Reclassified section 951A PTEP (viii) Section 951A PTEP (iii) General section 959(c)(1) PTEP Part I 2a q 5 4 5 Q ပ 2a Q 5a Q ပ က 4 9 9 ∞ 6 5 = <u>ද</u> 4 ω 6 9 Ξ 7 12 7 5 5 4

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

September 13, 2022 Schedule J (Form 5471) (Rev. 12-2020)

Part II	II Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))			
lmpo	Important: Enter amounts in functional currency.			
-	Balance at beginning of year			
8	Additions (amounts subject to future recapture)			
ო	Subtractions (amounts recaptured in current year)	က		
4	Balance at end of year (combine lines 1 through 3)			
		Š	Schedule J (Form 5471) (Rev. 12-2020)	-202

Tax Year 2022 Version A, Cycle 3

September 13, 2022 SCHEDULE M | Transa

1120 MeF ATS Scenario 3

Transactions Between Controlled Foreign Corporation and Shareholders or Other Related Persons

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

Name of foreign corporation

Name of person filing Form 5471

Anywork Finance Incorporated

Foreign Finance, Incorporated

(Form 5471)

► Attach to Form 5471.

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

Important: Complete a separate Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during

EIN (if any)

00-0000045

OMB No. 1545-0123

00-000003

Reference ID number (see instructions)

ABC1234

Identifying number

	annual accounting period between the foreign rs translated from functional currency at the a					ist be stated in U.S.
Ente	r the relevant functional currency and the exch	nange rate used thro	oughout this schedule	e ► British Pound	.6761	
	(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of	(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	LAI		SE (V
5	Cost sharing transaction payments received	V /-\ L				
6	Compensation received for technical, managerial, engineering, construction, or like services					
7	Commissions received					
8	Rents, royalties, and license fees received		I A			
9	Hybrid dividends received (see instructions)				_	
10	Dividends received (exclude hybrid dividends, deemed distributions under subpart F, and distributions of previously taxed income)		6 9	001		
11	Interest received					
12	Premiums received for insurance or reinsurance		, –			
13	Loan guarantee fees received					
14	Other amounts received (attach statement)					
15	Add lines 1 through 14					
16 17	Purchases of stock in trade (inventory) . Purchases of tangible property other than stock in trade					
18	Purchases of property rights (patents, trademarks, etc.)					
19	Platform contribution transaction payments paid					
20	Cost sharing transaction payments paid .					
21	Compensation paid for technical, managerial, engineering, construction, or like services .					
22	Commissions paid					
23	Rents, royalties, and license fees paid .					
24	Hybrid dividends paid (see instructions) .					
25	Dividends paid (exclude hybrid dividends paid)					
26	Interest paid					
27	Premiums paid for insurance or reinsurance					
28	Loan guarantee fees paid					
29	Other amounts paid (attach statement) .					
30	Add lines 16 through 29					

September 13, 2022 1120 MeF ATS

Tax Year 2022 1120 MeF ATS Scenario 3

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

Page 2

Name	e of person filing Form 5471					Identifying numb	per
			T-	I			I
	(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	co	10% or more U.S. shareholder of ontrolled foreign orporation (other n the U.S. person illing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
31	Accounts Payable						
32	Amounts borrowed (enter the maximum loan balance during the year)—see instructions						
33	Accounts Receivable						
34	Amounts loaned (enter the maximum loan balance during the year)—see instructions	46,001,741					

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

INTERNAL USE ONLY DRAFT AS OF May 6, 2021

Tax Year 2022 1120 MeF ATS Scenario 3

SCHEDULE 0 (Form 5471)

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

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

Name of person filing Form 5471

Name of foreign corporation

Anywork Finance, Incorporated

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

Attach to Form 5471.

EIN (if any)

OMB No. 1545-0704

00-000003

Reference ID number (see instructions)

Identifying number

Foreign Finance Corporation	nance Corporation 00-0000045 ABC1234											
Important: Complete a separate Scho	edule	O for each for	reign	corporation	for whi	ch informati	ion mus	t be rep	portea	1.		
Part I To Be Completed by	U.S.	Officers and	d Dire	ectors								
(a) Name of shareholder for whom acquisition information is reported		(b)			(c) Identifying nu of sharehole					(e) Date of additional 10% acquisition		
Anywork Finance, Incorporated		35 Any St., An	ytown	n, NY10006		00-00000	03	01/10)/1990			
Part II To Be Completed by	11.6	Sharoholdo	re									
Note: If this return is requ of such persons and the	iired i	because one c	or moi		ers bed	came U.S. p	ersons,	attach	a list s	shov	wing th	e names
		Section A-G	ener	al Sharehol	der Inf	ormation						
(a) Name, address, and identifying number of shareholder(s) filing this schedule		For shareholder's latest U.S. inc (1) (2) Type of return (enter form number) Characteristics (b) (b) (2) Date return filed				ne tax return filed, indicate: (3) Internal Revenue Service Center where filed			nter	(c) Date (if any) shareholder last filed information return under section 6046 for the foreign corporation		
Anywork Finance, Incorporated		1120		09/15/2019		Ogden						
Continue D. III	C D-		04	ficere er Di		of the Few						
(a) Name of U.S. officer or director	.S. PE	ersons who A	(1	b) bress	rectors		(c) cial securi					(d) appropriate ox(es)
										Officer	Director	
		0 11										
		Section	n C –	Acquisition	or Sto	CK				(e)		
(a)		(b) Class of stock		(c) Date of	N	(d) lethod of		Numb			acquired	1
Name of shareholder(s) filing this schedule		acquired	á	acquisition		equisition	(1 Dire			(2) directl	ly C	(3) onstructively
Anywork Finance, Incorporated		mmon		2/31/2019	Purch		25					
Anywork Finance, Incorporated	Pre	ferred	1 1	2/31/2019	Purch	ase	64.5	570				

Tax Year 2022 1120 MeF ATS Scenario 3

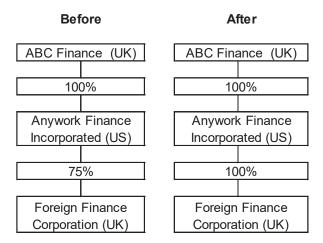
Schedule O (Form 5471) (Rev. 12-2012)

Schedule O (Form 5471) (Rev. 12-2012)						Page ∠
(f) Amount paid or value given		Name and addre	(g) ss of person from who	n shares were acq	uired	
9,000,000	Mary Doe, 812 May	ple Street, Somewhe	ere, MD 20901			
	Section	n D-Disposition	of Stock			
(a)	(b)	(c)	(d)	Numbe	(e) er of shares dis	sposed of
Name of shareholder disposing of stock	Class of stock	Date of disposition	Method of disposition	(1) Directly	(2) Indirectly	(3) Constructively
(f) Amount received		Name and address	(g) of person to whom disp	oosition of stock wa	as made	
Section	n E—Organization	n or Reorganizatio	on of Foreign Co	rporation		
Name	(a) and address of transfer	ror		(b) Identifying numb	per (if any)	(c) Date of transfer
Assets tran	(d) nsferred to foreign corp			Decement on of o	(e)	and by an nation or
(1) Description of assets	(2) Fair market va	Adjusted b	(3) asis (if transferor was J.S. person)	securities is:	ssets transferr sued by, foreig	red by, or notes or gn corporation

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 2022 1120 MeF ATS Scenario 3

(Rev. December 2021)

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.

OMB No. 1545-0123

, 2021 , and ending 12/31 For tax year of the reporting corporation beginning 01/01 Department of the Treasury Internal Revenue Service Note: Enter all information in English and money items in U.S. dollars. Part I Reporting Corporation (see instructions). All reporting corporations must complete Part I. 1b Employer identification number 1a Name of reporting corporation Anywork Finance Incorporated 00-000003 Number, street, and room or suite no. (If a P.O. box, see instructions.) 1c Total assets 35 Any Street City or town, state, and ZIP code (If a foreign address, see instructions.) \$ Anytown, NY 10006 250.306.361 1d Principal business activity ► International Finance 1e Principal business activity code ▶ 522293 1g Total number of Forms 5472 1h Total value of gross payments made or received 1f Total value of gross payments made or received reported on this Form 5472. See instructions. reported on all Forms 5472. See instructions. filed for the tax year 5.000 \$ 5,000 1k Total numbers of Part VIII 1i Check here if this is a 1j Check here if this is the initial year for 11 Country of incorporation attached to Form 5472 consolidated filing of which the U.S. reporting corporation Form 5472 is filing a Form 5472 US 10 Principal country(ies) where business is conducted 1m Date of incorporation 1n Country(ies) under whose laws the reporting corporation files an income tax return as a resident US Check here if, at any time during the tax year, any foreign person owned, directly or indirectly, at least 50% of (a) the total voting power of all classes of the stock of the reporting corporation entitled to vote, or (b) the total value of all classes of stock of the reporting corporation Check here if the reporting corporation is a foreign-owned domestic disregarded entity (foreign-owned U.S. DE) treated as a corporation for purposes of section 6038A. See instructions Part II 25% Foreign Shareholder (see instructions) Check here if any direct (or ultimate indirect) 25% foreign shareholder listed in Part II is a surrogate foreign corporation under section 7874(a)(2)(B). ► □ 4a Name and address of direct 25% foreign shareholder ABC Finance Corporation, 13 Somewhere, Birmingham, UK 126375 **4b(1)** U.S. identifying number, if any 4b(2) Reference ID number (see instructions) 4b(3) Foreign taxpayer identification number (FTIN), if any (see instructions) 00-00000214c Principal country(ies) where 4d Country of citizenship, 4e Country(ies) under whose laws the direct 25% foreign business is conducted organization, or incorporation shareholder files an income tax return as a resident UK UK 5a Name and address of direct 25% foreign shareholder 5b(1) U.S. identifying number, if any 5b(2) Reference ID number (see instructions) 5b(3) FTIN, if any (see instructions) **5e** Country(ies) under whose laws the direct 25% foreign 5c Principal country(ies) where 5d Country of citizenship, business is conducted organization, or incorporation shareholder files an income tax return as a resident 6a Name and address of ultimate indirect 25% foreign shareholder 6b(1) U.S. identifying number, if any 6b(2) Reference ID number (see instructions) 6b(3) FTIN, if any (see instructions) 6e Country(ies) under whose laws the ultimate indirect 25% foreign 6c Principal country(ies) where 6d Country of citizenship, business is conducted organization, or incorporation shareholder files an income tax return as a resident 7a Name and address of ultimate indirect 25% foreign shareholder 7b(1) U.S. identifying number, if any 7b(2) Reference ID number (see instructions) 7b(3) FTIN, if any (see instructions) 7c Principal country(ies) where 7d Country of citizenship, 7e Country(ies) under whose laws the ultimate indirect 25% foreign business is conducted shareholder files an income tax return as a resident organization, or incorporation

Form 5472 (Rev. 12-2021)

OIIII	5472 (16V. 12-2021)		rage Z
Par	rt III Related Party (see instructions). All reporting corporations must complete this question a	nd the res	t of Part III.
	Check applicable box: Is the related party a ✓ foreign person or ☐ U.S. person?		
	Name and address of related party		
	Finance 13 Somewhere, Birmingham, UK 126375		
8b(1)	U.S. identifying number, if any 8b(2) Reference ID number (see instructions) 8b(3) FTIN, if any (see instructions)		
	00-000021		
	Principal business activity ► International Finance 8d Principal business activity		522293
	Relationship—Check boxes that apply: Related to reporting corporation Related to 25% foreign shareholder		
81	Principal country(ies) where business is conducted 8g Country(ies) under whose laws the related party files an resident	income tax r	eturn as a
UK			
Dor	│ UK TIV Monetary Transactions Between Reporting Corporations and Foreign Related Par	hu (ooo ino	tructions)
Par		- `	,
	Caution: Part IV must be completed if the "foreign person" box is checked in the headilf estimates are used, check here. ► □	ng for Par	t III.
9	Sales of stock in trade (inventory)	9	
10	Sales of tangible property other than stock in trade	11	
11	Platform contribution transaction payments received	12	
12 13a	Rents received (for other than intangible property rights)	13a	
b	Royalties received (for other than intangible property rights)	13b	
14	Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	14	
15	Consideration received for technical, managerial, engineering, construction, scientific, or like services	15	
16	Commissions received	16	
17	Amounts borrowed (see instructions) a Beginning balance b Ending balance or monthly average ▶	17b	
18	Interest received	18	
19	Premiums received for insurance or reinsurance	19	
20	Loan guarantee fees received	20	
21	Other amounts received (see instructions)	21	
22	Total. Combine amounts on lines 9 through 21	22	
23	Purchases of stock in trade (inventory)	23	
24	Purchases of tangible property other than stock in trade	24	
25	Platform contribution transaction payments paid	25	
26	Cost sharing transaction payments paid	26	
27a	Rents paid (for other than intangible property rights)	27a	
b	Royalties paid (for other than intangible property rights)	27b	
28	Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	28	
29	Consideration paid for technical, managerial, engineering, construction, scientific, or like services	29	
30	Commissions paid	30	
31	Amounts loaned (see instructions) a Beginning balance b Ending balance or monthly average ▶	31b	5,000
32	Interest paid	32	
33	Premiums paid for insurance or reinsurance	33	
34	Loan guarantee fees paid	34	
35	Other amounts paid (see instructions)	35	
36	Total. Combine amounts on lines 23 through 35	36	5,000
Pa			
	Describe on an attached separate sheet any other transaction as defined by Regulations such as amounts paid or received in connection with the formation, dissolution, acquisiti		
	of the entity, including contributions to and distributions from the entity, and check here.		
Par	Nonmonetary and Less-Than-Full Consideration Transactions Between the Repor		oration
	and the Foreign Related Party (see instructions)	U P	
	Describe these transactions on an attached separate sheet and check here. ▶ □		

September 13, 2022 Form 5472 (Rev. 12-2021) Page 3

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

Tax Year 2022 1120 MeF ATS Scenario 3

Entity Classification Election

(Rev. December 2013)

OMB No. 1545-1516

	Revenue Service	► Information about Form 8832 and its instructions is at www.irs.g	ov/form8832.							
	Name of eligib	ele entity making election	Employer ide	ntification number						
	DEF Interna	tional Finance		00-000017						
Тур	Number, stree	t, and room or suite no. If a P.O. box, see instructions.	•							
or	1000 Helms	1000 Helmstraat								
Prin	City or town, s postal code.	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								
		Limburg, Netherlands 6211TA								
► Ch		ress change								
		ef for a late change of entity classification election sought under Reven	ue Procedure 2010-3	2						
Part	Election	n Information								
1	Type of electi	on (see instructions):								
а	✓ Initial class	sification by a newly-formed entity. Skip lines 2a and 2b and go to line	3.							
b	☐ Change in	current classification. Go to line 2a.								
2 a	Has the eligibl	e entity previously filed an entity election that had an effective date wit	hin the last 60 month	s?						
	_									
	Yes. Go to line 2b.									
	□ No. Skip lii □ No. Skip lii	ne 2b and go to line 3.								
2b	Was the eligib formation?	le entity's prior election an initial classification election by a newly form	ned entity that was eff	ective on the date of						
	☐ Yes. Go to	line 3. here. You generally are not currently eligible to make the election (see in	nstructions).							
3	Does the eligib	ole entity have more than one owner?								
	Yes. You c	an elect to be classified as a partnership or an association taxable as a c	orporation. Skip line 4	and go to line 5						
		an elect to be classified as an association taxable as a corporation or to								
4	If the eligible of	ntitu haa anlu ana ayyaar nyayida tha fallayying informatian								
4	ii trie eligible e	entity has only one owner, provide the following information:								
а	Name of owner	or ► Anywork Finance Incorporated								
		mber of owner ► 00-0000003								
b	identifying flui	Tibel of Owner P 00-0000003								
5		entity is owned by one or more affiliated corporations that file a consolic tification number of the parent corporation:	dated return, provide	the name and						
а	Name of parer	nt corporation ▶								
h		t corporation ►tification number ►								
	pioyor ideii	anication natifical r								

Cat. No. 22598R

Tax Year 2022 1120 MeF ATS Scenario 3

Form 8832 (Rev. 12-2013)

Part	Election Information (Continued)					
6	Type of entity (see instructions):					
a b c d e f	 □ A domestic eligible entity electing to be classified as an association taxable as □ A domestic eligible entity electing to be classified as a partnership. □ A domestic eligible entity with a single owner electing to be disregarded as a s □ A foreign eligible entity electing to be classified as an association taxable as a □ A foreign eligible entity electing to be classified as a partnership. ☑ A foreign eligible entity with a single owner electing to be disregarded as a septimental entity. 	eparate entity. corporation.				
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 10 Contact person's telephone number					
	Sam Brown, Tax Administrator	515-555-5550				
	Consent Statement and Signature(s) (see inst	ructions)				

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 2022 1120 MeF ATS Scenario 3

(Rev. September 2021)

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.

OMB No. 1545-1910

Information furnished for the FDE's or FB's annual accounting period (see instructions) Attachment Department of the Treasury Sequence No. 140 beginning 01/01 , 20 21, and ending Internal Revenue Service Filer's identifying number Name of person filing this return Anywork Finance Incorporated 00-000003 Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address) City or town, state, and ZIP code Anytown, NY 10006 Filer's tax year beginning 20 , and ending 20 Important: Fill in all applicable lines and schedules. All information must be in English. All amounts must be stated in U.S. dollars unless otherwise indicated. FDE of a U.S. person FDE of a controlled foreign corporation (CFC) FDE of a controlled foreign partnership Check here FB of a U.S. person FB of a CFC FB of a controlled foreign partnership ✓ Initial Form 8858 Final Form 8858 Check here 1a Name and address of FDE or FB b(1) U.S. identifying number, if any DFF International Finance 00-0000017 1000 Helmstraat b(2) Reference ID number (see instructions) Maastricht, Limburg/Netherlands 6211TA c For FDE, country(ies) under whose laws organized and entity type under local tax law e Effective date as FDE d Date(s) of organization Netherlands Foreign Entity 12/30/2021 12/31/2021 f If benefits under a U.S. tax treaty were claimed with respect to g Country in which principal business h Principal business i Functional currency income of the FDE or FB, enter the treaty and article number activity is conducted activity Provide the following information for the FDE's or FB's accounting period stated above. a Name, address, and identifying number of branch office or agent (if any) in **b** Name and address (including corporate department, if applicable) of person(s) the United States with custody of the books and records of the FDE or FB, and the location of such books and records, if different For the tax owner of the FDE or FB (if different from the filer), provide the following (see instructions): a Name and address **b** Annual accounting period covered by the return (see instructions) **ABCDEF Finance Corporation** c(1) U.S. identifying number, if any 14 Somewhere 00-0000022 Birmingham, England 126375 c(2) Reference ID number (see instructions) d Country under whose laws organized e Functional currency For the direct owner of the FDE or FB (if different from the tax owner), provide the following (see instructions): a Name and address **b** Country under whose laws organized c U.S. identifying number, if any d Functional currency

Cat. No. 21457L

Tax Year 2022

Farm 0	September 13, 2022 1120 MeF ATS Scenario 3				
	edule C Income Statement (see instructions)				Page 2
Impo dollar section speci	rtant: Report all information in functional currency in accordance with U.S. GA is translated from functional currency (using GAAP translation rules or the averan 989(b)). If the functional currency is the U.S. dollar, complete only the U.S. all rules for FDEs or FBs that use U.S. dollar approximate separate transactions are using the average exchange rate (determined under section 989(b)), check	age Dol metl	exchange rate de lars column. See hod of accountin	etermine instruct g (DAST	ed under tions for M).
			Functional Currency		ollars
1	Gross receipts or sales (net of returns and allowances)	1	Tunouonal curronoy	0.0.2	Ollaro
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			
Sch	edule C-1 Section 987 Gain or Loss Information				
	Note: See the instructions if there are multiple recipients of remittances from the FDE or FB.		(a) Amount stated in functional currency of FDE or FB	functional of	stated in
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			
	W			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 refrom the FDE or FB during the tax year? If "Yes," attach a statement describing the the change and new method of accounting	meth	od used prior to		√
Sch	edule F Balance Sheet				
	rtant: Report all amounts in U.S. dollars computed in functional currency and			ollars in	
accoi	dance with U.S. GAAP. See instructions for an exception for FDEs or FBs that	use l			
	Assets		(a) Beginning of annual accounting period	End of	o) annual
			accounting period	accountir	ng period
1	Cash and other current assets	1			
2	Other assets	3			
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			
	edule 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 ind	irectl	y, in any foreign		
	partnership?				✓
3	Answer only if the FDE made its election to be treated as disregarded from its owner Did the tax owner claim a loss with respect to stock or debt of the FDE as a result of the				

During the tax year, did the FDE or FB pay or accrue any foreign tax that was disqualified for credit under During the tax year, did the FDE or FB pay or accrue foreign taxes to which section 909 applies, or treat

foreign taxes that were previously suspended under section 909 as no longer suspended? . . .

Page 3

Tax Year 2022 1120 MeF ATS Scenario 3

Scn	edule G Other Information (continued)		
6	Is the FDE or FB a qualified business unit as defined in section 989(a)?	Yes	No ✓
Ü	Do not complete lines 7 and 8 if you are an individual who owns an FB or FDE directly or through tiers of		•
	FBs and FDEs.		
7a	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 7b		
b	and 7c		✓
c	Enter the total amount of the base erosion tax benefit \$		
8a	During the tax year, did the FDE or FB pay, or accrue the payment of, any amounts defined as a base erosion payment under section 59A(d) or have a base erosion tax benefit under section 59A(c)(2) to a foreign		,
b	person, which is a related party of the taxpayer? See instructions. If "Yes," complete lines 8b and 8c Enter the total amount of the base erosion payments		•
С	Enter the total amount of the base erosion tax benefit \$		
9	Answer only if the tax owner of the FDE or FB is a CFC: Were there any intracompany transactions between the FDE or FB and the CFC or any other branch of the CFC during the tax year, in which the FDE or FB acted as a manufacturing, selling, or purchasing branch?		
	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. Answer questions 10a through 11c if the tax owner of the FB or the interest in the FDE is treated as a U.S. corporation solely for purposes of these questions.		
10a			
	part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii), does the separate unit have		,
b	a dual consolidated loss as defined in Regulations section 1.1503(d)-1(b)(5)(ii)?		✓
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		,
b	defined in Regulations section 1.1503(d)-1(b)(5)(ii)? If "Yes," complete lines 11b and 11c		√
С	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		
С	If "Yes," is the documentation that is required for the permitted domestic use under Regulations section 1.1503(d)-6 attached to the return? After answering this question, go to line 13a		
d	If this was not a permitted domestic use, was the dual consolidated loss used to compute consolidated taxable income as provided under Regulations section 1.1503(d)-4? If "Yes," go to line 12e		
е	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?		✓
	If "Yes," enter the total amount of recapture ▶\$. See instructions.		
	edule H Current Earnings and Profits or Taxable Income (see instructions)		
	rtant: Enter the amounts on lines 1 through 6 in functional currency. Current year net income (loss) per foreign books of account		
1 2	Current year net income (loss) per foreign books of account		
3	Total net subtractions		
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)		
6	Combine lines 4 and 5		
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		

September 13, 2022 Form 8858 (Rev. 9-2021)

Tax Year 2022 1120 MeF ATS Scenario 3

Form 8858 (Rev. 9-2021)

Sched	dule I Tra	ansferred Loss	Amount (see	instructions)					
Importa	ant: See instru	uctions for who	has to comple	ete this section.					
								Yes	No
	Were any assets of an FB (including an FB that is an FDE) transferred to a foreign corporation? If "No," stop here. If "Yes," go to line 2								✓
aı	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								
		ferred loss amou		•	•				
Sched	lule J Inc	ome Taxes Pai	d or Accrued	I (see instructio	ns)				
		Foreign Inc	come Taxes		For	reign Tax Credit	Separate Cate	gories	
(a) Country or Possession		(c) Foreign Currency	(d) Conversion Rate	(e) U.S. Dollars	(f) Foreign Branch	(g) Passive	(h) General		(i) Other
Totals									

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

Tax Year 2022

1120 MeF ATS Scenario 3

(Rev. September 2021)

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)

Attachment

Department of the Treasury Internal Revenue Service

01/01 , 20 21 , and ending Sequence No. 140

OMB No. 1545-1910

Name of person filing this return	<u> </u>	· · · · · · · · · · · · · · · · · · ·	Filer's identifying number			
Anywork Finance Incorporated			00-000003			
Number, street, and room or suite no. (or P.O. box number if mail is not delivered to str	reet address)					
35 Any Street						
City or town, state, and ZIP code						
Anytown, NY 10006						
Filer's tax year beginning , 20	, and ending , 20					
Important: Fill in all applicable lines and schedules. All informu.S. dollars unless otherwise indicated.	nation must be in English. All amounts must be stated in					
Check here FDE of a U.S. person FDE of a controlled to	oreign corporation (CFC	FDE of a	controlled foreign partnership			
✓ FB of a U.S. person ☐ FB of a CFC		FB of a co	ontrolled foreign partnership			
Check here ✓ Initial Form 8858 ☐ Final Form 8858						
1a Name and address of FDE or FB	b(1) U.S. identifyin	g number, if any				
GHI International Finance		00-000018	}			
2000 Helmstraat Maastricht, Limburg/Netherlands 6211TA	b(2) Reference ID	number (see instructions)				
c For FDE, country(ies) under whose laws organized and entity type under local tax la	aw	d Date(s) of organization	e Effective date as FDE			
Netherlands Foreign Entity		12/30/2021	12/31/2021			
	nich principal business ducted	h Principal business activity	i Functional currency			
Provide the following information for the FDE's or FB's accounting period stated at 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		ng period covered by the ret	turn (see instructions)			
	c(1) U.S. identifyin	g number, if any				
	c(2) Reference ID	number (see instructions)				
	d Country under w	rhose 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 instruction	ns):				
a Name and address		hose laws organized				
	c U.S. identifying r	number, if any	d Functional currency			

1 01111 0000 (1101: 0 202	'/		
Schedule C	Income Statement	(see instructions)	

dolla secti spec	ortant: Report all information in functional currency in accordance with U.S. GA rs translated from functional currency (using GAAP translation rules or the aver on 989(b)). If the functional currency is the U.S. dollar, complete only the U.S. ial rules for FDEs or FBs that use U.S. dollar approximate separate transactions u are using the average exchange rate (determined under section 989(b)), check	age Doll metl	exchange rate de lars column. See nod of accountin	etermine instruct g (DAST	d under tions for M).
			Functional Currency	U.S. D	ollars
1	Gross receipts or sales (net of returns and allowances)	1	1,000,000		1,000,000
2	Cost of goods sold	2	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
Sch	edule C-1 Section 987 Gain or Loss Information				
	Note: See the instructions if there are multiple recipients of remittances from the FDE or FB.		(a) Amount stated in functional currency of FDE or FB		stated in currency of
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 r	espe	ct to remittances		
	from the FDE or FB during the tax year? If "Yes," attach a statement describing the	meth	od used prior to		
	the change and new method of accounting				✓
	nedule F Balance Sheet				
	ortant: Report all amounts in U.S. dollars computed in functional currency and			ollars in	
acco	rdance with U.S. GAAP. See instructions for an exception for FDEs or FBs that	use L	DASTM.		
	Assets		(a) Beginning of annual	(k End of	o) annual
	A35013		accounting period	accountir	
1	Cash and other current assets	1			
2	Other assets	2			
3	Total assets	3			
	Liabilities and Owner's Equity				
	Elabilities and Strine 5 Equity				
4	Liabilities	4			
5	Owner's equity	5			
6	Total liabilities and owner's equity	6			
Sch	nedule 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 indepartnership?				✓
3					
	Answer only if the FDE made its election to be treated as disregarded from its owner Did the tax owner claim a loss with respect to stock or debt of the FDE as a result of t				
4		he ele alified	ection? for credit under		→

Sch	edule G Other Information (continued)	_	
		Yes	No
6	Is the FDE or FB a qualified business unit as defined in section 989(a)?		√
	Do not complete lines 7 and 8 if you are an individual who owns an FB or FDE directly or through tiers of FBs and FDEs.		
7a	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 7b and 7c		<i>y</i>
b c	Enter the total amount of the base erosion payments Enter the total amount of the base erosion tax benefit \$		•
8a b c	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 8b and 8c Enter the total amount of the base erosion payments Enter the total amount of the base erosion tax benefit \$		✓
9	Answer only if the tax owner of the FDE or FB is a CFC: Were there any intracompany transactions between the FDE or FB and the CFC or any other branch of the CFC during the tax year, in which the FDE or FE acted as a manufacturing, selling, or purchasing branch?		
	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. Answer questions 10a through 11c if the tax owner of the FB or the interest in the FDE is treated as a U.S. corporation solely for purposes of these questions.		
10a b	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)?	,	✓
	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 ▶ \$ ()		
С	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		
С	If "Yes," is the documentation that is required for the permitted domestic use under Regulations section 1.1503(d)-6 attached to the return? After answering this question, go to line 13a		
d	If this was not a permitted domestic use, was the dual consolidated loss used to compute consolidated taxable income as provided under Regulations section 1.1503(d)-4? If "Yes," go to line 12e		
е	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?		✓
	If "Yes," enter the total amount of recapture > \$. See instructions.		
	rtant: Enter the amounts on lines 1 through 6 in functional currency.		
1	rtant: Enter the amounts on lines 1 through 6 in functional currency. Current year net income (loss) per foreign books of account		90,000
2	Total net additions		80,000
3	Total net subtractions		
4	Current earnings and profits (or taxable income—see instructions) (line 1 plus line 2 minus line 3)	_	
5	DASTM gain (loss) (if applicable)		
6	Combine lines 4 and 5	_	
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))		80,000
8	Enter exchange rate used for line 7		

September 13, 2022 Form 8858 (Rev. 9-2021)

Tax Year 2022 1120 MeF ATS Scenario 3

Form 8858 (Rev. 9-2021)

Sched	dule I Tra	insferred Loss	Amount (see	instructions)					
Importa	ant: See instru	uctions for who I	has to comple	ete this section.					
								Yes	No
	•	s of an FB (includes," go to line 2.	•	,		•			
aı	n FB that is ar	ror a domestic con n FDE) to a speci	fied 10%-own	ed foreign corpor	ation? If "No,"	stop here. If "\	res," go to		
3 In	nmediately aft	er the transfer, von corporation? If	vas the dome	stic corporation	a U.S. shareh	older with resp	ect to the		
		ferred loss amou		•	•				
Sched	lule J Inc	ome Taxes Pai	d or Accrued	d (see instruction	ns)				
		Foreign Inc	ome Taxes		Foi	reign Tax Credit	Separate Cate	gories	
(a) Country or Possession	(b) Foreign Tax Year (YYYY-MM-DD)	(c) Foreign Currency	(d) Conversion Rate	(e) U.S. Dollars	(f) Foreign Branch	(g) Passive	(h) General		(i) Other
NL					20,000				
Totals									

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

(Rev. December 2022)

Department of the Treasury

Internal Revenue Service

Tax Year 2022 1120 MeF ATS Scenario 3

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

Form **8992** (Rev. 12-2022)

Attachment Sequence No. 992

Name of person filing this return A Identifying number **Anywork Finance Incorporated** 00-000003 Name of U.S. shareholder **B** Identifying number Net Controlled Foreign Corporation (CFC) Tested Income Part I 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 Schedule A (Form 8992), line 1, column (e). 1 800,000 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. Sum of Pro Rata Share of Net Tested Loss If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (f). 2 If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (f), that pertains to the U.S. shareholder. Net CFC Tested Income. Combine lines 1 and 2. If zero or less, stop here 3 800,000 Part II Calculation of Global Intangible Low-Taxed Income (GILTI) 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 Schedule A (Form 8992), line 1, column (g), by 10% (0.10). 2 100,000 If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (i), that pertains to the U.S. shareholder. **3a** Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated 3a group, enter the total from Schedule A (Form 8992), line 1, column (j). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3a blank. Sum of Pro Rata Share of Tested Interest Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (i). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3b blank. c Specified Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0-. Зс 0 If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder. Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0-4 100,000 GILTI. Subtract line 4 from line 1. If zero or less, enter -0-700.00

Tax Year 2022
1120 MeF ATS Scenario 3
Schedule of Controlled Foreign Corporation (CFC) Information To Compute September 13, 2022 SCHEDULE A Sc

Go to www.irs.gov/Form 8992 for instructions and the latest information.

Global Intangible Low-Taxed Income (GILTI)

Attachment Sequence No. **992A**

OMB No. 1545-0123

Department of the Treasury Internal Revenue Service (Rev. December 2022) (Form 8992)

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

			5 (Calc	Calculations for Net Tested Income (see instructions)	Tested Incom	9			GILTI A Tested Ir (see in:	GILTI Allocated to Tested Income CFCs (see instructions)
(a) Name of CFC	(b) EIN or Reference ID	(c) Tested Income	(d) Tested Loss	(e) Pro Rata Share of Tested Income	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	(i) Pro Rata Share of Tested Interest Expense	(K) GILTI Allocation Ratio (Divide Col. (e) by Col. (e), Line 1 Total)	(I) GILTI Allocated to Tested Income CFCs (Multiply Form 8992, Part II, Line 5, by Col. (k))
NL		800,000		800,000		1,000,000				1.0000	700,000
)				(
](
1. Totals (see instructions)	rctions)	800,000		000'008) 000'000'1				1.0000	700,000

Totals on line 1 should include the totals from any continuation sheets. For Paperwork Reduction Act Notice, see Instructions for Form 8992.

Cat. No. 71396P

Schedule A (Form 8992) (Rev. 12-2022)

Page 2

00-0000003

B Identifying number

A Identifying number

September 13, 2022 Schedule A (Form 8992) (Rev. 12-2022)

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

Anywork Finance Incorporated Name of U.S. shareholder

									,		
			5	Calc	Calculations for Net Tested Income (see instructions)	: Tested Incom ctions)		N		GILTI A Tested Ir (see in	GILTI Allocated to Tested Income CFCs (see instructions)
(a) Name of CFC	(b) EIN or Reference ID	(c) Tested Income	(d) Tested Loss	(e) Pro Rata Share of Tested Income	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	Pro Rata Share of Tested Interest Income	(i) Pro Rata Share of Tested Interest Expense	(k) GILTI Allocation Ratio (Divide Col. (e) by Col. (e), Line 1 Total)	(I) GILTI Allocated to Tested Income CFCs (Multiply Form 8992, Part II, Line 5, by Col. (K))
							()				
							()				
							()				
			(()				
							()				
			()				()				
			()		(()				
			()		(()				
			()				(
			()		(()				
1. Totals (see instructions) .	uctions)										
Totals of columns (c) through (l) should be included on line 1 Totals on page 1.	(c) through	(I) should be ir	ncluded on line 1	Totals on pag	e 1.				Schedule A (Form 8992) (Rev. 12-2022)	orm 8992)	(Rev. 12-2022)

Tax Year 2022 1120 MeF ATS Scenario 3

(Rev. December 2021)

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. 993

Department of the Treasury Internal Revenue Service Name of person filing this return Identifying number Anywork Finance Incorporated 00-000003

Part	Determining Deduction Eligible Incom	e (DEI) and Dee	med Intangible	Income (DII) (s	ee in	structions)
1	Gross income		1 · () ·		1	
2	Exclusions					
а	Income included under section 951(a)(1) (see instru	uctions)	2a			
b	Income included under section 951A (see instructi					
С	Financial services income	· · · · · · · · · · · · · · · · · · ·	2c			
d	CFC dividends (see instructions)		2d			
е			. 2e			
f	Domestic oil and gas extraction income	1	2f			
3	Total exclusions (add lines 2a through 2f)		4. ()). <u>.</u>		3	
4	Total exclusions (add lines 2a through 2f) Gross DEI (subtract line 3 from line 1)		.		4	
5	Deductions properly allocable to the amount on lin	ne 4			5	
6	DEI (subtract line 5 from line 4)				6	
7a	DEI (subtract line 5 from line 4)	BAI)	7a	_		
b	DTIR (10% of QBAI) from partnerships		7b			
С	Total DTIR (add lines 7a and 7b)				7c	
8					8	
Part	DII (subtract line 7c from line 6)	on Eligible Inco	me (FDDEI) (see	instructions)		
		(A) Foreign-derived	(B) Foreign-derived	(C) Foreign-derived		(2) = 1 1 1 1 1
		income from all sales	income from all sales	income from all		(D) Total (add columns (A) through (C))
		of general property	of intangible property	services		(, (. , ,
9a	Gross receipts				9a	
b	Gross receipts from partnerships				9b	
С	Total gross receipts (add lines 9a and 9b)				9с	
10a	Cost of goods sold (COGS) (see instructions) .				10a	
b	COGS from partnerships (see instructions)				10b	
С	Total COGS (add lines 10a and 10b)				10c	
11	Gross FDDEI (subtract line 10c from line 9c) .				11	
12	Allocable deductions				12	
13	Allocable deductions from partnerships				13	
14	Interest deductions				14	
15	Research and experimental deductions				15	
16	Other apportioned deductions				16	
17	Other apportioned deductions from partnerships .				17	
18	Total deductions (add lines 12 through 17)				18	
19	FDDEI (subtract line 18 from line 11)				19	
Part	Determining FDII and/or GILTI Deduct	i on (see instruct	ions)			
20	Foreign-derived ratio (FDDEI/DEI) (divide line 19 by	y line 6)			20	
21	FDII (multiply line 8 by line 20)				21	
22	GILTI inclusion (see instructions)				22	700,000
23	Total FDII and GILTI (add lines 21 and 22)				23	700,000
24	Taxable income (see instructions) (If zero or less, and 29.)				24	1,054,613
25	Excess FDII and GILTI over taxable income (subt					1,004,013
	here and on lines 26 and 27				25	0
26	FDII reduction (divide line 21 by line 23; multiply by	·			26	
27	GILTI reduction (subtract line 26 from line 25) $$.				27	
28	FDII deduction (see instructions). Enter here and o				28	
29	GILTI deduction (see instructions). Enter here and	on Form 1120, Sc	hedule C		29	437,500