U.S. Income Tax Return of a Foreign Corporation OMB No. 1545-0123 For calendar year 2019, or tax year beginning , 2019, and ending 2019 ▶ Go to www.irs.gov/Form1120F for instructions and the latest information. Internal Revenue Service **Employer identification number** Name **Type** Check box(es) if: Number, street, and room or suite no. (see instructions) Initial return or Final return Name or address change **Print** City or town, state or province, country, and ZIP or foreign postal code First post-merger return Amended return Schedule M-3 attached Protective return Country of incorporation \_\_\_\_\_ Α If the corporation had an agent in the United States at any time during Foreign country under whose laws the income reported on this return the tax year, enter: (1) Type of agent is also subject to tax Date incorporated \_\_\_\_\_ C (2) Name (1) Location of corporation's primary books and records (city, province (3) Address or state, and country) \_\_\_\_\_ See the instructions and enter the corporation's principal: (2) Principal location of worldwide business (1) Business activity code number ▶ (2) Business activity ▶ (3) Product or service ► Check method of accounting: (1) Cash (2) Accrual (3) If the corporation maintains an office or place of business in the . . ▶ □ (3) ☐ Other (specify) ► United States, check here. Computation of Tax Due or Overpayment Tax from Section I, line 11, page 3 . . . . . . 2 2 Tax from Section II, Schedule J, line 9, page 5 . . . . . . . 3 Tax from Section III (add lines 6 and 10 on page 6). 3 4 Total tax. Add lines 1 through 3 . . . . . . 5a 2018 overpayment credited to 2019 . . . 5a 2019 estimated tax payments . . . . 5b b Less 2019 refund applied for on Form 4466 . 5c ( С Combine lines 5a through 5c . . . . . . . . . . . . . . . . . d 5d 5e е Credit for tax paid on undistributed capital gains (attach Form 2439) 5f Credit for federal tax paid on fuels (attach Form 4136). See instructions 5g g U.S. income tax paid or withheld at source (add line 12, page 3, and amounts from 5i Estimated tax penalty (see instructions). Check if Form 2220 is attached . . . . . . . . . . . 6 6 7 **Amount owed.** If line 5j is smaller than the total of lines 4 and 6, enter amount owed 8a Overpayment. If line 5j is larger than the total of lines 4 and 6, enter amount overpaid . 8a Amount of overpayment on line 8a resulting from tax deducted and withheld under Chapters 3 and 4 (from Schedule W. line 7, page 8) 8b 9 Enter portion of line 8a you want Credited to 2020 estimated tax . Refunded ▶ 9 Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge. Sign May the IRS discuss this return Here Signature of officer Yes No Date Print/Type preparer's name Preparer's signature Date Check if

Firm's name

Firm's address ▶

**Paid** 

**Preparer** 

**Use Only** 

self-employed

Firm's EIN ▶

Phone no.

Form 1120-F (2019) Page 2 Additional Information (continued from page 1) Yes No At the end of the tax year, did any individual, partnership, H Did the corporation's method of accounting change corporation, estate, or trust own, directly or indirectly, 50% from the preceding tax year? . . . . . . . . . or more of the corporation's voting stock? (See section 267 If "Yes," attach a statement with an explanation. Did the corporation's method of determining income If "Yes," attach a statement showing the name and change from the preceding tax year? . . . . identifying number. (Do not include any information already entered in item T.) Enter percentage owned ▶ If "Yes," attach a statement with an explanation. W (1) Is the corporation taking a position on this return that a Did the corporation file a U.S. income tax return for the preceding tax year? . . . . . . . . . . . . U.S. tax treaty overrules or modifies an Internal Revenue law of the United States, thereby causing a reduction of tax? . (1) At any time during the tax year, was the If "Yes," the corporation is generally required to complete corporation engaged in a trade or business in the and attach Form 8833. See Form 8833 for exceptions. Note: Failure to disclose a treaty-based return position may (2) If "Yes," is taxpayer's trade or business within the result in a \$10,000 penalty (see section 6712). United States solely the result of a section 897 (2) Is the corporation claiming treaty benefits pursuant to, or (FIRPTA) sale or disposition? . . . . . . . . otherwise filing its return pursuant to, a Competent Authority determination or an Advance Pricing Agreement? . . . L Did the corporation have a permanent establishment If "Yes," attach a copy of the Competent Authority in the United States for purposes of any applicable tax determination letter or Advance Pricing Agreement to your treaty between the United States and a foreign If "Yes," enter the name of the foreign country: X During the tax year, did the corporation own any entity that was disregarded as an entity separate from its owner under Regulations sections 301.7701-2 and 301.7701-3? . . M Did the corporation have any transactions with related If "Yes." attach a statement listing the name, country under whose laws the entity was organized, and EIN (if any) of each such entity. If "Yes," Form 5472 may have to be filed (see instructions). (1) Did a partnership allocate to the corporation a Υ Enter number of Forms 5472 attached ▶ distributive share of income from a directly owned Is the corporation a controlled foreign corporation? partnership interest, any of which is ECI or treated as ECI by (See section 957(a) for definition.) . . . . . . the partnership or the partner? . . . . . . . . . . If "Yes," attach Schedule P. See instructions. Is the corporation a personal service corporation? (See instructions for definition.) . . . . . . . . (2) During the tax year, did the corporation own, directly or indirectly, at least a 10% interest, in any foreign partnership? Enter tax-exempt interest received or accrued during the tax year (see instructions) ▶ \$\_\_\_\_\_ If "Yes," see instructions for required attachment. **Z** (1) Has the corporation engaged in any transactions the **Q** At the end of the tax year, did the corporation own, results of which are subject to the arm's-length standard directly or indirectly, 50% or more of the voting stock under section 482 and its regulations? . . . . . . of a U.S. corporation? (See section 267(c) for rules of attribution.) . . . . . . . . . . . . . . . . (2) Has the corporation recognized any interbranch amounts? If "Yes," attach statement (see instructions) . . . . . If "Yes," attach a statement showing (1) name and EIN of such U.S. corporation; (2) percentage owned; AA Is the corporation required to file Schedule UTP (Form and (3) taxable income or (loss) before NOL and 1120), Uncertain Tax Position Statement (see instructions)? special deductions of such U.S. corporation for the If "Yes," complete and attach Schedule UTP. tax year ending with or within your tax year. BB During the corporation's tax year, did the corporation make R If the corporation has an NOL for the tax year and is any payments that would require it to file Forms 1042 and electing to forego the carryback period, check here 1042-S under chapter 3 (sections 1441 through 1464) or (see instructions) . . . . . . . . . . . . . . . . chapter 4 (sections 1471 through 1474) of the Code? . . . **S** Enter the available NOL carryover from prior tax years. **CC** Is the corporation (including the home office or any branch) (Do not reduce it by any deduction on line 30a, page a qualified derivatives dealer (QDD)? . . . . . . . . 4.) ▶ \$ (1) If "Yes," attach Schedule Q (Form 1120-F) (see instructions) (2) If "Yes," enter the QI-EIN ▶ T Is the corporation a subsidiary in a parent-subsidiary controlled group? . . . . . . . . . . . . . DD Does the corporation have gross receipts of at least \$500 If "Yes," enter the parent corporation's: million in any of the 3 preceding tax years (see sections (1) EIN ▶ 59A(e)(2) and (3))? . . . . . . . . . . . . . . . If "Yes," complete and attach Form 8991. (2) Name ► EE During the tax year, did the corporation pay or accrue any **U** (1) Is the corporation a dealer under section 475?. . interest or royalty for which a deduction is not allowed

(2) Did the corporation mark to market any securities or commodities other than in a dealer capacity? . . .

under section 267A (see instructions)? . . . . . .

If "Yes," enter the total amount of the disallowed deductions . . . ▶

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Add	litional Information (continued from page	2)		Н	<b>H</b> Dui	ing the tax year	, dic	the corporation d	ispose of an	Yes	No
1 f	Did the corporation have an election under section 63(j) for any real property trade or business or any arming business in effect during the tax year (see astructions)?		No		inte a tr	rest in a partnershade or business we the corporation a	nip th vithin attacl	at directly or indirect the United States? ning Form 8996 to d?	tly engaged in certify as a		
<b>GG</b> Does the corporation satisfy <b>one or more</b> of the following (see instructions)?						res," enter amoun m 8996, line 14		m ▶\$			
c	<ol> <li>The corporation owns a pass-through entity with current, or prior year carryover, excess business interest expense.</li> </ol>										
r	2) The corporation's aggregate average annual gross eceipts (determined under section 448(c)) for the 3 tax ears preceding the current tax year are more than \$26 nillion and the corporation has business interest expense.										
c	3) The corporation is a tax shelter and the corporation has business interest expense. f "Yes," to any, complete and attach Form 8990.										
	CTION I—Income From U.S. Sources Not ted States—Do not report items properly with								de or Busin	ess i	n the
Form types treat state	Report all gross transportation income subject to 4% tax on line 9. Report other column (a) income items only if not properly withheld and reported on Form 1042-S. The rate of tax on these <b>gross</b> income items is 30% or such lower rate specified by tax treaty. No deductions are allowed against these types of income. Enter treaty rates where applicable. <b>If the corporation is claiming a lower treaty rate, also complete item W on page 2.</b> If multiple treaty rates apply to a type of income (for example, subsidiary and portfolio dividends or dividends received by disregarded entities), attach a statement showing the amounts, tax rates, and withholding for each.										
Nam	e of treaty country, if any ►					1			(0)	\	
	(a) Class of income (see instructions)		(b) s amou	nt		(c) Rate of tax (%)	,	<b>(d)</b> Amount of tax liability	Amount of U.S paid or withheld	. incom	
1	Interest										
2	Dividends (excluding payments received by QDDs in their equity derivatives dealer capacity)										
21	Dividend equivalents (excluding payments received by QDDs in their equity derivatives dealer capacity)										
3	Rents										
4	Royalties										
5 6	Annuities										
7	Gains from sale or exchange of patents, copyrights, etc.										
8	Fiduciary distributions (attach supporting statement)										
9 10	Gross transportation income (see instructions) Other items of income					4					
							+				
11 12	Total. Enter here and on line 1, page 1						L				
13	Is the corporation fiscally transparent under the listed above?  If "Yes," attach a statement that provides the infor	aws of	the fo	ore	eign ju	risdiction with res	spect	to any item of inco	☐ Yes		No

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## SECTION II - Income Effectively Connected With the Conduct of a Trade or Business in the United States (see instructions) Important: Fill in all applicable lines and schedules. If you need more space, see Assembling the Return in the instructions. Gross receipts or sales **b** Less returns and allowances c Bal▶ 1c Gross profit (subtract line 2 from line 1c) ncome Interest Capital gain net income (attach Schedule D (Form 1120)) . . . . . . . . . **Total income.** Add lines 3 through 10 . Deductions (See instructions for limitations on deductions.) Bad debts (for bad debts over \$500,000, attach a list of debtors and amounts) Interest expense from Schedule I, line 25 (see instructions) . . . . . . Depreciation from Form 4562 not claimed on Form 1125-A or elsewhere on return (attach Form 4562) . . . Reserved for future use . . Deductions allocated and apportioned to ECI from Schedule H, line 20 (see instructions) . . . .

Taxable income before NOL deduction and special deductions (subtract line 28 from line 11) . . . .

Less: a Net operating loss deduction (see instructions) . . . . . . .

c Add lines 30a and 30b . .

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30c

30a

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## SECTION II - Income Effectively Connected With the Conduct of a Trade or Business in the United States (continued) Schedule C **Dividends and Special Deductions** (see instructions) (c) Special deductions: (a) Dividends (b) % (a) $\times$ (b) Dividends from less-than-20%-owned domestic corporations (other 50 Dividends from 20%-or-more-owned domestic corporations (other than 2 65 see instructions 3 Dividends on certain debt-financed stock of domestic and foreign corporations (section 246A) 4 Dividends on certain preferred stock of less-than-20%-owned public utilities 23.3 26.7 5 Dividends on certain preferred stock of 20%-or-more-owned public utilities . 6 Dividends from less-than-20%-owned foreign corporations . . . . . 50 65 7 Dividends from 20%-or-more-owned foreign corporations . . . . . . . 8 **Subtotal.** Add lines 1 through 7. See instructions for limitation Dividends from foreign corporations not included on line 3, 6, or 7 . . . 9 10 IC-DISC and former DISC dividends not included on line 1, 2, or 3 (section 246(d)) 11 12 Deduction for dividends paid on certain preferred stock of public utilities . 13 **Total dividends.** Add column (a), lines 8 through 11. Enter here and on line 4, page 4 Total special deductions. Add column (c), lines 8 and 12. Enter here and on line 30b, page 4 Schedule J Tax Computation (see instructions) Check if the corporation is a member of a controlled group (attach Schedule O (Form 1120)) . . . . 2 2 3 Base erosion minimum tax amount (attach Form 8991) . . . Add lines 2 and 3 . . . . . . . . . . . . . . . . . 4 Foreign tax credit (attach Form 1118) . . . . . . . . . . . . . . . General business credit (attach Form 3800) . . . . . . b Credit for prior year minimum tax (attach Form 8827) . . . . . 5c С Bond credits from Form 8912 . . . . . . . . . . . . . . . . . 6 **Total credits.** Add lines 5a through 5d . . . . . . . . . . . . . . 7 Subtract line 6 from line 4 . . . . . ☐ Form 8611 8 Other taxes. Check if from: Form 4255 Form 8697

☐ Form 8902

Other (attach statement) . .

☐ Form 8866

**Total tax.** Add lines 7 and 8. Enter here and on line 2, page 1 . . . . . .

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SEC	TION III – Branch Profits Tax and Tax on Excess Interest		
Par	t I—Branch Profits Tax (see instructions)		
1	Enter the amount from Section II, line 29	1	
2	Enter total adjustments to line 1 to get effectively connected earnings and profits. (Attach required statement		
	showing the nature and amount of adjustments.) (See instructions.)	2	
3	Effectively connected earnings and profits. Combine line 1 and line 2	3	
4a	Enter U.S. net equity at the end of the current tax year. (Attach required statement.)	4a	
b	Enter U.S. net equity at the end of the prior tax year. (Attach required statement.)	4b	
C	Increase in U.S. net equity. If line 4a is greater than or equal to line 4b, subtract line 4b from line 4a. Enter the		
	result here and skip to line 4e	4c	
C	Decrease in U.S. net equity. If line 4b is greater than line 4a, subtract line 4a from line 4b	4d	
e	Non-previously taxed accumulated effectively connected earnings and profits. Enter excess, if any, of effectively connected earnings and profits for preceding tax years beginning after 1986 over any dividend equivalent amounts		
	for those tax years	4e	
5	Dividend equivalent amount. Subtract line 4c from line 3. If zero or less, enter -0 If no amount is entered on line		
	4c, add the lesser of line 4d or line 4e to line 3 and enter the total here	5	
6	<b>Branch profits tax.</b> Multiply line 5 by 30% (0.30) (or lower treaty rate if the corporation is a qualified resident or otherwise qualifies for treaty benefits). (See instructions.) Enter here and include on line 3, page 1. <b>Also complete</b>		
	item W on page 2	6	
	t II — Tax on Excess Interest (see instructions for this Part and for Schedule I (Form 1120-F))		
	Enter the interest from Section II, line 18	7a	
b	Enter the inverse of the total amount deferred, capitalized, and disallowed from Schedule I, line 24d (i.e., if line 24d is negative, enter as a positive number; if line 24d is positive, enter as a negative number)	7b	
c	Combine lines 7a and 7b (amount must equal Schedule I, line 23)	7c	
8	<b>Branch Interest</b> (see instructions for definition): Enter the sum of Schedule I, line 9, column (c), and Schedule I, line 22. If the interest paid by the foreign corporation's U.S. trade or business was increased because 80% or more of the foreign corporation's assets are U.S. assets, check this box	8	
9a	Excess interest. Subtract line 8 from line 7c. If zero or less, enter -0-	9a	
b	If the foreign corporation is a bank, enter the excess interest treated as interest on deposits (see instructions for rules for computing this amount). Otherwise, enter -0-	9b	
c	Subtract line 9b from line 9a	9c	
10	<b>Tax on excess interest.</b> Multiply line 9c by 30% (0.30) (or lower treaty rate if the corporation is a qualified resident or otherwise qualifies for treaty benefits). (See instructions.) Enter here and include on line 3, page 1.		
	Also complete item W on page 2	10	
Par	t III – Additional Information	1 .0	
			Yes No
11	Is the corporation claiming a reduction in, or exemption from, the branch profits tax due to:		
а	A complete termination of all U.S. trades or businesses?		
b	The tax-free liquidation or reorganization of a foreign corporation?		

If **11a** or **11b** applies and the transferee is a domestic corporation, attach Form 8848. If **11c** applies, attach the statement required by Temporary Regulations section 1.884-2T(d)(5).

**c** The tax-free incorporation of a U.S. trade or business?

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	e: Check if completing on ► U.S. bas	<del></del>	asis			
Sc	hedule L Balance Sheets per Book	(S				
		Beginning	of tax year	End of tax year		
	Assets	(a)	(b)	(c)	(d)	
1	Cash					
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)					
6a	Interbranch current assets*					
b	Other current non-U.S. assets*					
C	Other current U.S. assets*					
7	Loans to shareholders					
8	Mortgage and real estate loans					
	Other loans and investments—non-U.S.					
эа	assets*					
b	Other loans and investments—U.S. assets*.					
	Buildings and other depreciable assets					
	Less accumulated depreciation	(		(		
	Depletable assets	,		,		
	Less accumulated depletion	(		(		
12	Land (net of any amortization)	,		,		
	Intangible assets (amortizable only)					
b	Less accumulated amortization	(		(		
14	Assets held in trust	,		,		
15	Other non-current interbranch assets*					
16a	Other non-current non-U.S. assets*					
b	Other non-current U.S. assets*					
17	Total assets					
	Liabilities					
18	Accounts payable					
19	Mortgages, notes, bonds payable in less than					
	1 year:					
а	Interbranch liabilities*					
b	Third-party liabilities*					
20	Other current liabilities*					
	Loans from shareholders					
22	Mortgages, notes, bonds payable in 1 year or					
•	more:					
а	Interbranch liabilities*					
b	Third-party liabilities*					
23	Liabilities held in trust					
24a	Other interbranch liabilities*					
b	Other third-party liabilities*					
	Equity					
25	Capital stock: a Preferred stock					
	<b>b</b> Common stock					
26	Additional paid-in capital					
27	Retained earnings—Appropriated*					
28	Retained earnings—Unappropriated					
29	Adjustments to shareholders' equity*					
30	Less cost of treasury stock		( )		( )	
31	Total liabilities and shareholders' equity					

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Sc	nedule W Overpayment Resulting From Tax Deducted and Withheld Under Chapters 3	and 4	l i
1	Total Chapter 3 and 4 payments. Enter the amount from page 1, line 5i	1	
2	Enter the tax amount from page 1, line 1		
3	Enter the portion of the tax amount shown on page 1, line 2, pertaining to income associated with amounts deducted and withheld under sections 1445 and 1446 (see instructions for general guidelines)		
4	Total Chapter 3 and 4 tax. Combine lines 2 and 3	4	
5	Tentative overpayment resulting from tax deducted and withheld under Chapters 3 and 4.		
	Subtract line 4 from line 1	5	
6	Enter the amount from page 1, line 8a	6	
7	Overpayment resulting from tax deducted and withheld under Chapters 3 and 4.		
	Enter the smaller of line 5 or line 6. Enter the result here and on page 1, line 8b	7	

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