

Note: The draft you are looking for begins on the next page.

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## SCHEDULE M-3 (Form 1120-F)

Department of the Treasury

Internal Revenue Service

Name of corporation

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

Attach to Form 1120-F.

Go to www.irs.gov/Form1120F for instructions and the latest information.

OMB No. 1545-0123

2022

Employer identification number

Α	Has the corporation reported taxable income on Form 1120-F, page 4, using a treaty provision to attrib business profits to a U.S. permanent establishment under rules other than section 864(c)?	ute	∥ ∐ Yes	□ No
В	Did the corporation prepare a non-consolidated, worldwide, certified audited income statement for period (see instructions)?	the	☐ Yes	□ No
C D	Did the corporation prepare a non-consolidated, worldwide income statement for the period (see instruction Did the corporation prepare certified audited income statement(s) for the set(s) of books reported Form 1120-F, Schedule L?		☐ Yes	□ No
Part	Financial Information and Net Income (Loss) Reconciliation (see instructions)			
1	Is the corporation a foreign bank as defined in Regulations section 1.882-5(c)(4)?  Yes. Complete the remainder of Part I as follows:  If D is "Yes," use the income statement described in D to complete lines 2 through 5 and 7 through 1  If D is "No," use the income statement(s) for the set(s) of books reported on Form 1120-F, Schedul to complete lines 2 through 5 and 7 through 11.  No. Complete the remainder of Part I as follows:  If B is "Yes," use the income statement described in B to complete lines 2 through 11.  If B is "No" and C is "Yes," use the income statement described in C to complete lines 2 through 11.  If B and C are "No" and D is "Yes," use the income statement described in D to complete lines 2 through If B, C, and D are "No," use the income statement described in the instructions to complete lines 2 through II B, C, and D are "No," use the income statement described in the instructions to complete lines 2 through II B, C, and D are "No," use the income statement described in the instructions to complete lines 2 through II B, C, and D are "No," use the income statement described in the instructions to complete lines 2 through II B, C, and D are "No," use the income statement described in the instructions to complete lines 2 through II B, C, and D are "No," use the income statement described in the instructions to complete lines 2 through II B, C, and D are "No," use the income statement described in the instructions to complete lines 2 through II B, C, and D are "No," use the income statement described in the instructions to complete lines 2 through II B, C, and D are "No," use the income statement described in the instructions to complete lines II B and II B	le L		
2a b	Enter the income statement period: Beginning Ending Has the corporation's income statement been restated for the income statement period entered on line 2 Yes. Attach an explanation and the amount of each item restated No. Has the corporation's income statement been restated for any of the 5 income statement periods immerpreceding the period on line 2a? Yes. Attach an explanation and the amount of each item restated No.		ely	
3	Is any of the corporation's stock publicly traded on any exchange, U.S. or foreign?  Yes. List exchange(s) and symbol  No.			
4	Non-consolidated foreign corporation net income (loss) in U.S. dollars from the income statement source identified in line 1	4		
5a b c	Net income from includible disregarded foreign entities not included on line 4 (attach statement) Net loss from includible disregarded foreign entities not included on line 4 (attach statement) Net income from includible disregarded U.S. entities not included on line 4 (attach statement)	5a 5b 5c	(	)
d	Net loss from includible disregarded U.S. entities not included on line 4 (attach statement)	5d	(	)
6	Net income (loss) from foreign locations not included on line 4 (attach statement)	6	,	,
7a	Net income of non-includible entities (attach statement)	7a	(	
b 8	Net loss of non-includible entities (attach statement)	7b 8	-	
9	Adjustments to intercompany transactions (attach statement)	9		
10	Other adjustments to reconcile to amount on line 11 (attach statement)	10		
11	Adjusted financial net income (loss) of non-consolidated foreign corporation. Combine lines 4	-		
	through 10	11		

Name of corporation Employer identification number

## Part II Reconciliation of Net Income (Loss) per Income Statement of Non-Consolidated Foreign Corporations With Taxable Income per Return (see instructions)

	Taxable income per metarin (se					
	Income (Loss) Items	(a) Income (Loss) per Income Statement	(b) Temporary Differences	(c) Permanent Differences	(d) Other Permanent Differences for Allocations to Non-ECI and ECI	(e) Income (Loss) per Tax Return
1	Gross receipts					
2	Cost of goods sold (attach statement) .					
3a	Dividends from foreign entities					
b	Dividends from U.S. entities					
	Substitute dividend payments received					00
c 4a	Interest income excluding interest equivalents	NOE		28.	20	22
b	Substitute interest payments received					
С	Interest equivalents not included on line 4b					
5	Gross rental income					
6	Gross royalty income					
7	Fee and commission income					
8	Income (loss) from equity method corporations	14				
9	Net income (loss) from U.S. partnerships					
	Net income (loss) from certain foreign					
10	partnerships (see instructions)					
11	Net income (loss) from other pass-through entities (attach statement)					
12	Items relating to reportable transactions (attach statement)					
13	Hedging transactions					
14a	Mark-to-market income (loss) under section 475(a)					
b	Mark-to-market income (loss) subject to section 475(d)(3)(B)					
С	Mark-to-market income (loss) under section 475(e)					
d	Mark-to-market income (loss) under section 475(f)					
15	Gain (loss) from certain section 988 transactions					
16a	Interest income from global securities dealing					
b	Dividends from global securities dealing					
С	Gains (losses) and other fixed and determinable, annual, or periodic income from global securities dealing not included on lines 16a and 16b.					
17	Sales versus lease (for sellers and/or lessors)					
18	Section 481(a) adjustments					
19	Unearned/deferred revenue					
20	Original issue discount, imputed					
20	interest, and phantom income					
21a	Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities					
b	Gross capital gains from Schedule D, excluding amounts from pass-through entities					
					0 1 1 1 14	-3 (Form 1120_E) 2022

Employer identification number

Part II	Reconciliation of Net Income (Loss) per Income Statement of Non-Consolidat	ed Foreign Corporations
	With Taxable Income per Return (see instructions) (continued from page 2)	

(Loss) Return
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Part III Reconciliation of Net Income (Loss) per Income Statement of Non-Consolidated Foreign Corporations
With Taxable Income per Return (see instructions)

	Expense/Deduction Items	(a) Expense per Income Statement	<b>(b)</b> Temporary Differences	(c) Permanent Differences	(d) Other Permanent Differences for Allocations to Non-ECI and ECI	(e) Deduction per Tax Return
1	U.S. current income tax expense					
2	U.S. deferred income tax expense					
3	Non-U.S. current income tax expense (other than foreign withholding taxes) .					
4	Non-U.S. deferred income tax expense					
5	Non-U.S. withholding taxes					
6	Compensation with section 162(m) limitation					
7	Salaries and other base compensation					
8	Stock option expense					
9	Other equity-based compensation					
10	Meals and entertainment					
11	Fines and penalties					
12	Judgments, damages, awards, and similar costs					

Name of corporation Employer identification number

## Part III Reconciliation of Net Income (Loss) per Income Statement of Non-Consolidated Foreign Corporations With Taxable Income per Return (see instructions) (continued from page 3)

	Expense/Deduction Items	(a) Expense per Income Statement	(b) Temporary Differences	(c) Permanent Differences	(d) Other Permanent Differences for Allocations to Non-ECI and ECI	<b>(e)</b> Deduction per Tax Return
13 14 15	Pension and profit-sharing  Other post-retirement benefits  Deferred compensation			5	UF	
16 17	Charitable contributions	nbe	er 2	28.	20	22
18	Current year acquisition or reorganization investment banking fees, legal and accounting fees					
19 20	Current year acquisition/reorganization other costs	N		ΕП	ᆂ	
21	Amortization/impairment of goodwill .  Amortization of acquisition, reorganization, and start-up costs					
22	Other amortization or impairment write-offs					
23	Depreciation					
24 25	Bad debt expense					
25	and/or lessees)					
26a	Interest expense per books					
b	Interest expense under Regulations section 1.882-5 (from Schedule I (Form 1120-F), line 23)				2	
С	Regulations section 1.882-5 allocation amount subject to deferral or disallowance (from Schedule I (Form 1120-F), line 24g)			( )		
d	Substitute interest payments					
е	Interest equivalents (for example, guarantee fees) not included on line 26d					
27 28 29	Substitute dividend payments Fee and commission expense					
30	Royalty expense					
31	Expenses allocable to effectively connected income under Regulations section 1.861-8 from home office or other books that do not give rise to U.S. booked liabilities (from Schedule H (Form 1120-F), line 20)					
32	Other expense/deduction items with differences (attach statement)					
33	<b>Total expense/deduction items.</b> Combine lines 1 through 32. Enter here and on Part II, line 26					2 (Faure 1100 F) 0000