

Caution: DRAFT—NOT FOR FILING

This is an early release draft of an IRS tax form, instructions, or publication, which the IRS is providing for your information as a courtesy. **Do not file draft forms.** Also, do **not** rely on draft forms, instructions, and publications for filing. We generally do not release drafts of forms until we believe we have incorporated all changes. However, unexpected issues sometimes arise, or legislation is passed, necessitating a change to a draft form. In addition, forms generally are subject to OMB approval before they can be officially released. Drafts of instructions and publications usually have at least some changes before being officially released.

Early release drafts are at <u>IRS.gov/DraftForms</u>, and may remain there even after the final release is posted at <u>IRS.gov/DownloadForms</u>. All information about all forms, instructions, and pubs is at <u>IRS.gov/Forms</u>.

Almost every form and publication also has its own page on IRS.gov. For example, the Form 1040 page is at IRS.gov/Form1040; the Publication 17 page is at IRS.gov/Pub17; the Form W-4 page is at IRS.gov/W4; and the Schedule A (Form 1040) page is at IRS.gov/ScheduleA. If typing in a link above instead of clicking on it, be sure to type the link into the address bar of your browser, not in a Search box. Note that these are friendly shortcut links that will automatically go to the actual link for the page.

If you wish, you can submit comments about draft or final forms, instructions, or publications at IRS.gov/FormsComments. We cannot respond to all comments due to the high volume we receive. Please note that we may not be able to consider many suggestions until the subsequent revision of the product.

SCHEDULE H (Form 965)

(January 2019)

Department of the Treasury Internal Revenue Service

Name of person filing this return

Amounts Reported on Forms 1116 and 1118 and Disallowed Foreign Taxes

► Attach to Form 965.

▶ Go to www.irs.gov/Form965 for instructions and the latest information.

OMB No. 1545-0123

Identifying number

SECTION 1 - Amounts Reported on Forms 1116 and 1118 and Disallowed Foreign Taxes Separate Category (Enter code-see instructions.) а . . . If code 901 is entered on line a, enter the country code for the sanctioned country (see instructions). b 2018 Tax Year 1 Section 965(a) inclusion amount in U.S. Dollars from Schedule F, column (e)(1), line 16 1 Section 965(a) inclusion in U.S. Dollars with respect to pass-throughs from Schedule F. 2 column (e)(1), line 17 3 Total 965(a) inclusion in U.S. Dollars. Add lines 1 and 2. Report amount here and on Form 1116, Part I, or 1118, Sch. A (see instructions) . 3 Section 965(c) deduction in U.S. Dollars not from pass-throughs allocable to section 4 Section 965(c) deduction in U.S. Dollars from pass-throughs allocable to section 965(a) 5 5 6 Total section 965(c) deduction in U.S. Dollars. Add lines 4 and 5. Report amount here and on Form 1116, Part I, or Form 1118, Sch. A. 6 7 Taxes deemed paid not from pass-throughs. 7 Enter amount from Schedule F, column (I), line 16 8 Taxes deemed paid through pass-throughs. Enter amount from Schedule F, column (I), line 17 8 9 Taxes deemed paid. Add lines 7 and 8. Report amount here and on Form 1118, Part I, Sch. B, column 3 . . . 9 2018 Applicable Percentage not from pass-throughs. 10 10 11 2018 Applicable Percentage from pass-throughs. If there are multiple pass-throughs, leave this line blank and attach a schedule 11 Disallowed foreign taxes not from pass-throughs. Multiply line 7 by line 10 12 12 Disallowed foreign taxes through pass-throughs. Attach calculation. See instructions 13 13 14 Disallowed foreign taxes. Add lines 12 and 13. Report amount here and on Form 1118, Schedule G, Part I, line F 14 2017 Tax Year 15 Section 965(a) inclusion amount in U.S. Dollars from Schedule G, column (e)(1), line 16 15 16 Section 965(a) inclusion in U.S. Dollars from pass-throughs from Schedule G, column 16 17 17 Section 965(c) deduction in U.S. Dollars not from pass-throughs allocable to section 18 18 19 Section 965(c) deduction in U.S. Dollars from pass-throughs allocable to section 965(a) 19 20 20 Total section 965(c) deduction in U.S. Dollars. Add lines 18 and 19 . Taxes deemed paid not from pass-throughs. 21 Enter amount from Schedule G, column (I), line 16 21 22 Taxes deemed paid through pass-throughs. Enter amount from Schedule G, column (I), line 17 22 Taxes deemed paid. Add lines 21 and 22 23 23 24 **2017 Applicable Percentage.** Enter amount from Schedule H, line 46 25 2017 Applicable Percentage from pass-throughs. If there are multiple pass-throughs, leave this line blank and attach a schedule 26 Disallowed foreign taxes not from pass-throughs. Multiply line 21 by line 24 26 27 **Disallowed foreign taxes from pass-throughs.** Attach calculation (see instructions) . . . 27 28 **Disallowed foreign taxes.** Add lines 26 and 27 28

Schedule H (Form 965) (1-2019) Page **2**

SECTION 2—Applicable Percentage for Disallowance of Foreign Tax Credit Not From Pass-Throughs

	2018 Tax Year Applicable Percentage		2018 Tax Year
29	Portion of the aggregate 2018 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 12	29	
30	Total section 965(a) inclusion amount. Enter the sum of Form 965, Part II, section 1, lines 9 and 12	30	
31	Divide line 29 by line 30	31	
32	Applicable percentage with respect to the portion of the aggregate 2018 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Multiply line 31 by 0.771	32	
33	Portion of the aggregate 2018 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 9	33	18
34	Total section 965(a) inclusion amount. Enter the sum of Form 965, Part II, section 1, lines 9 and 12	34	
35	Divide line 33 by line 34	35	
36	Applicable percentage with respect to the portion of the aggregate 2018 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Multiply line 35 by 0.557	36	
37	2018 Applicable Percentage. Add lines 32 and 36	37	
	2017 Tax Year Applicable Percentage		2017 Tax Year
38	Portion of the aggregate 2017 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 23	38	
39	Total section 965(a) inclusion amount.		
	Enter the sum of Form 965, Part II, section 1, lines 20 and 23	39	
40	Divide line 38 by line 39	40	
41	Applicable percentage with respect to the portion of the aggregate 2017 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Multiply line 40 by 0.771	41	
42	Portion of the aggregate 2017 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 20 .	42	
43	Total section 965(a) inclusion amount. Enter the sum of Form 965, Part II, section 1, lines 20 and 23	43	
44	Divide line 42 by line 43	44	
45	Applicable percentage with respect to the portion of the aggregate 2017 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Multiply line 44 by 0.557	45	
46	2017 Applicable Percentage. Add lines 41 and 45	46	

Schedule H (Form 965) (1-2019)