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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. U.S. Income Tax Return of a Foreign Corporation

For calendar year 2018, or tax year beginning
2018, and ending $\qquad$ , 20

- Go to www.irs.gov/Form1120F for instructions and the latest information. $\qquad$ 2018



## Computation of Tax Due or Overpayment




For Paperwork Reduction Act Notice, see separate instructions.

## Additional Information (continued from page 1)

H Did the corporation's method of accounting change from the preceding tax year?.
If "Yes," attach a statement with an explanation.
I Did the corporation's method of determining income change from the preceding tax year? If "Yes," attach a statement with an explanation.
J Did the corporation file a U.S. income tax return for the preceding tax year?
K (1) At any time during the tax year, was the corporation engaged in a trade or business in the United States?
(2) If "Yes," is taxpayer's trade or business within the United States solely the result of a section 897 (FIRPTA) sale or disposition?
$\mathbf{L}$ Did the corporation have a permanent establishment in the United States for purposes of any applicable tax treaty between the United States and a foreign country?
If "Yes," enter the name of the foreign country:

M Did the corporation have any transactions with related parties?
If "Yes," Form 5472 may have to be filed (see instructions).
Enter number of Forms 5472 attached
$\mathbf{N}$ Is the corporation a controlled foreign corporation? (See section 957(a) for definition.)
O Is the corporation a personal service corporation? (See instructions for definition.)
P Enter tax-exempt interest received or accrued during the tax year (see instructions) $>$ $\qquad$
Q At the end of the tax year, did the corporation own, directly or indirectly, $50 \%$ or more of the voting stock of a U.S. corporation? (See section 267(c) for rules of attribution.) .
If "Yes," attach a statement showing (1) name and EIN of such U.S. corporation; (2) percentage owned; and (3) taxable income or (loss) before NOL and special deductions of such U.S. corporation for the tax year ending with or within your tax year.
R If the corporation has an NOL for the tax year and is electing to forego the carryback period, check here (see instructions).
$\mathbf{S}$ Enter the available NOL carryover from prior tax years. (Do not reduce it by any deduction on line 30a, page 4.) \$

T Is the corporation a subsidiary in a parent-subsidiary controlled group?
If "Yes," enter the parent corporation's:
(1) EIN
(2) Name

U (1) Is the corporation a dealer under section 475?. (2) Did the corporation mark to market any securities or commodities other than in a dealer capacity? .

| Yes | No |
| :--- | :--- |
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X


V At the end of the tax year, did any individual, partnership, corporation, estate, or trust own, directly or indirectly, $50 \%$ or more of the corporation's voting stock? (See section 267(c) for rules of attribution.) If "Yes," attach a statement showing the name and identifying number. (Do not include any information already entered in item T.) Enter percentage owned $>$
W (1) Is the corporation taking a position on this return that a U.S. tax treaty overrules or modifies an Internal Revenue law of the United States, thereby causing a reduction of tax? If "Yes," the corporation is generally required to complete and attach Form 8833. See Form 8833 for exceptions.
Note: Failure to disclose a treaty-based return position may result in a \$10,000 penalty (see section 6712).
(2) Is the corporation claiming treaty benefits pursuant to, or otherwise filing its return pursuant to, a Competent Authority determination or an Advance Pricing Agreement?

If "Yes," attach a copy of the Competent Authority determination letter or Advance Pricing Agreement to your return.
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?
If "Yes," attach a statement listing the name, country under whose laws the entity was organized, and EIN (if any) of each such entity.
Y (1) Did a partnership allocate to the corporation a distributive share of income from a directly owned partnership interest, any of which is ECl or treated as ECl by the partnership or the partner?
If "Yes," attach Schedule P. See instructions.
(2) During the tax year, did the corporation own directly or indirectly, at least a $10 \%$ interest, in any foreign partnership? If "Yes," see instructions for required attachment.
Z (1) Has the corporation engaged in any transactions the results of which are subject to the arm's length standard under section 482 and its regulations?
(2) Has the corporation recognized any interbranch amounts? If "Yes," attach statement (see instructions) .
AA ls the corporation required to file Schedule UTP (Form 1120), Uncertain Tax Position Statement (see instructions)? If "Yes," complete and attach Schedule UTP.
BB 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?
CC Is the corporation (including the home office or any branch) a qualified derivatives dealer (QDD)?
(1) If "Yes," attach the required statement (see instructions)
(2) If "Yes," enter the QI-EIN

DD 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.
EE During the tax year, did the corporation pay or accrue any interest or royalty for which a deduction is not allowed under section 267A (see instructions)?
If "Yes," enter the total amount of the
disallowed deductions . . . $\$$

Yes ${ }^{2}$ No

| Yes | No |
| :--- | :--- |
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## SECTION I- Income From U.S. Sources Not Effectively Connected With the Conduct of a Trade or Business in the United States-Do not report titems properly withheld and reported on Form 1042-S. See instructions.

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 gross 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. If the corporation is claiming a lower treaty rate, also complete item $\mathbf{W}$ on page 2 . 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.


SECTION II-Income Effectively Connected With the Conduct of a Trade or Business in the United States (see instructions)

| $\begin{aligned} & \text { © } \\ & \text { E } \\ & 0 \\ & \text { In } \end{aligned}$ | 1a | Gross receipts or sales |  |  | b Less returns and allowances |  |  |  | c Bal | 1c |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 2 | Cost of goods sold (at | ttach Form 1125-A | -A) . | - . | . . | . . |  | . . . | 2 |  |  |  |  |
|  | 3 | Gross profit (subtract | line 2 from line 1 |  | . . . . . . . . | . . | . . |  | . . . | 3 |  |  |  |  |
|  | 4 | Dividends (Schedule C | C, line 13) |  | . . . . . . . . | . |  |  |  | 4 |  |  |  |  |
|  | 5 | Interest . . |  |  | . . . . . . |  |  |  |  | 5 |  |  |  |  |
|  | 6 | Gross rents |  |  | . . . . . |  |  |  |  | 6 |  |  |  |  |
|  | 7 | Gross royalties |  |  | . . . . . . . |  |  |  |  | 7 |  |  |  |  |
|  | 8 | Capital gain net incom | me (attach Sched | dule D | (Form 1120)) |  |  |  |  | 8 |  |  |  |  |
|  | 9 | Net gain or (loss) from | Form 4797, Part | It II, lin | ne 17 (attach Form 4797) |  |  |  |  | 9 |  |  |  |  |
|  | 10 | Other income (see inst | tructions-attach | h stat | tement) . . . . . |  |  |  |  | 10 |  | Q |  |  |
|  | 11 | Total income. Add lin | nes 3 through 10 |  |  |  |  |  | - | 11 |  |  |  |  |
| ©00000000 | 12 | Compensation of offic | cers (see instructio | ions | -attach Form 1125-E) |  |  |  |  | 12 |  |  |  |  |
|  | 13 | Salaries and wages (le | ess employment | credit | dits) . . . . . |  |  |  |  | 13 |  |  |  |  |
|  | 14 | Repairs and maintenan | ance |  |  |  |  |  |  | 14 |  |  |  |  |
|  | 15 | Bad debts (for bad deb | bts over \$500,00 | 00, att | tach a list of debtors and amo | unts). |  |  | . | 15 |  |  |  |  |
|  | 16 | Rents |  |  |  |  |  |  | . | 16 |  |  |  |  |
|  | 17 | Taxes and licenses |  |  |  |  |  |  | - . | 17 |  |  |  |  |
|  | 18 | Interest expense from | Schedule I, line | 25 (s | see instructions) |  |  |  |  | 18 |  |  |  |  |
|  | 19 | Charitable contribution | ns . . . |  | . . . . . . . . . |  |  |  | - . | 19 |  |  |  |  |
|  | 20 | Depreciation from Form | rm 4562 not claim | med on | on Form 1125-A or elsewhere | on return | (attach |  | m 4562) | 20 |  |  |  |  |
|  | 21 | Depletion | . . . . . | . . | . . . . . . . . . | . . | . . . |  | . . . | 21 |  |  |  |  |
|  | 22 | Advertising . . | , | . | . . . . . . . . . | . . | . . |  | . . . | 22 |  |  |  |  |
|  | 23 | Pension, profit-sharing | g, etc., plans | . | . . . . . . . . . | . . | . |  | . . . | 23 |  |  |  |  |
|  | 24 | Employee benefit prog | grams | . | . . . . . . . . | . . | . . |  | . . . | 24 |  |  |  |  |
|  | 25 | Reserved for future us | se . | . . | - • . . . | . . | . . |  | . . . | 25 |  |  |  |  |
|  | 26 | Deductions allocated | and apportioned | to EC | CI from Schedule H, line 20 (s | see instruc | ctions) . |  | . . . | 26 |  |  |  |  |
|  | 27 | Other deductions (atta | ach statement) |  | . . . . . . . . . | . . | . . . |  | . . . | 27 |  |  |  |  |
|  | 28 | Total deductions. Add | dd lines 12 throug | gh 27 | 7 . . . | . . | . . |  | $\checkmark$ | 28 |  |  |  |  |
|  | 29 | Taxable income before | e NOL deduction | n and | special deductions (subtract | line 28 fro | from line |  |  | 29 |  |  |  |  |
|  | 30 | Less: a Net operatin | ing loss deductio | (see | e instructions) . . . . | 30a |  |  |  |  |  |  |  |  |
|  |  | b Special ded | ductions (Schedu | Ule C, | , line 14) . . . . . | 30b |  |  |  |  |  |  |  |  |
|  |  | c Add lines 3 | 30a and 30b |  |  |  |  |  | . | 30c |  |  |  |  |
|  | 31 | Taxable income or (los | ss). Subtract line | 30c f | from line 29 . . . . | . | . . . |  | . . . | 31 |  |  |  |  |

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)

|  | Dividends from less-than-20\%-owned domestic corporations (other than debt-financed stock) | (a) Dividends received | (b) \% | (c) Special deductions: (a) $\times$ (b) |
| :---: | :---: | :---: | :---: | :---: |
|  |  |  | 50 |  |
| 2 | Dividends from 20\%-or-more-owned domestic corporations (other than debt-financed stock) |  | 65 |  |
| 3 | Dividends on certain debt-financed stock of domestic and foreign corporations (section 246A) |  | instruetions |  |
| 4 | Dividends on certain preferred stock of less-than-20\%-owned public utilities |  | 23.3 |  |
| 5 | Dividends on certain preferred stock of 20\%-or-more-owned public utilities |  | 26.7 |  |
| 6 | Dividends from less-than-20\%-owned foreign corporations |  | 50 |  |
| 7 | Dividends from 20\%-or-more-owned foreign corporations | - | 65 | $\square$ |
| 8 | Subtotal. Add lines 1 through 7. See instructions for limitation |  | $\stackrel{\text { instructions }}{ }$ | - |
| 9 | Dividends from foreign corporations not included on lines 3, 6, or 7 |  |  |  |
| 10 | IC-DISC and former DISC dividends not included on lines 1, 2, or 3 (section 246(d)) | , |  |  |
| 11 | Other dividends |  |  |  |
| 12 | Deduction for dividends paid on certain preferred stock of public utilities |  |  |  |
| 13 | Total dividends. Add lines 8 through 11. Enter here and on line 4, page 4 |  |  |  |
| 14 | Total special deductions. Add lines 8 and 12. Enter here and on line 30b, page 4 |  | $\checkmark$ |  |
| Schedule J Tax Computation (see instructions) |  |  |  |  |
| 12345 | Check if the corporation is a member of a controlled group (attach Schedule O (Form 1120)) . . . $\square$ |  |  |  |
|  | Income tax . . . . . . . . . . . . . . . . . . . . . . . . . . . . |  | 2 |  |
|  | Base erosion minimum tax (attach Form 8991) |  | 3 |  |
|  | Add lines 2 and 3 |  | 4 |  |
|  | Foreign tax credit (attach Form 1118) . . . . . . . . . . . 5 a |  |  |  |
|  | General business credit (attach Form 3800) |  |  |  |
|  | Credit for prior year minimum tax (attach Form 8827) |  |  |  |
|  | Bond credits from Form 8912 . . . . . . . . . . . . . 5 |  |  |  |
| 6 | Total credits. Add lines 5a through 5d |  | 6 |  |
| 7 | Subtract line 6 from line 4 |  | 7 |  |
|  | Other taxes. Check if from: $\square$ Form 4255 $\square$ Form 8611 $\square$ Form 8866$\quad \square$ Form $8902 \quad \square$ | rm 8697 <br> ther (attach statement) | 8 |  |
| 9 | Total tax. Add lines 7 and 8. Enter here and on line 2, page 1 |  | 9 |  |

## SECTION III-Branch Profits Tax and Tax on Excess Interest

## Part I-Branch Profits Tax (see instructions)

1 Enter the amount from Section II, line 29.
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.) .
3 Effectively connected earnings and profits. Combine line 1 and line 2
4a Enter U.S. net equity at the end of the current tax year. (Attach required statement.)
b Enter U.S. net equity at the end of the prior tax year. (Attach required statement.)
c Increase in U.S. net equity. If line $4 a$ is greater than or equal to line $4 b$, subtract line $4 b$ from line $4 a$. Enter the result here and skip to line 4 e
d Decrease in U.S. net equity. If line 4 b is greater than line 4 a , subtract line 4 a from line 4 b
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
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 $4 d$ or line 4 e to line 3 and enter the total here
6 Branch profits tax. 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. Also complete item W on page 2
Part II-Tax on Excess Interest (see instructions for this Part and for Schedule I (Form 1120-F))
7a Enter the interest from Section II, line 18
b Enter the inverse of the total amount deferred, capitalized, and disallowed from Schedule I, line 24d (i.e., if line $24 d$ is negative, enter as a positive number; if line $24 d$ is positive, enter as a negative number) .
c Combine lines 7a and 7b (amount must equal Schedule I, line 23)
8 Branch Interest (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
9a Excess interest. Subtract line 8 from line 7c. If zero or less, enter -0-
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-.
c Subtract line 9b from line 9a
10 Tax on excess interest. 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 $\mathbf{W}$ on page 2

| $7 a$ |  |  |
| :---: | :--- | :--- |
| $7 b$ |  |  |
| 7 c |  |  |
|  |  |  |
| 8 |  |  |
| $9 a$ |  |  |
| $9 b$ |  |  |
| 9 c |  |  |
|  |  |  |
| 10 |  |  |

## Part III-Additional Information

11 Is the corporation claiming a reduction in, or exemption from, the branch profits tax due to:
a A complete termination of all U.S. trades or businesses?
b The tax-free liquidation or reorganization of a foreign corporation?
c The tax-free incorporation of a U.S. trade or business?

If 11a or $\mathbf{1 1 b}$ 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).

Note: Check if completing on $\quad \square$ U.S. basis or $\square$ Worldwide basis.

## Schedule L Balance Sheets per Books



## Schedule W Overpayment Resulting From Tax Deducted and Withheld Under Chapters 3 and 4

1 Total Chapter 3 and 4 payments. Enter the amount from page 1, line 5 i
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
5 Tentative overpayment resulting from tax deducted and withheld under Chapters 3 and 4. Subtract line 4 from line 1
6 Enter the amount from page 1 , line 8 a
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


