

Internal Revenue Service
Department of the Treasury

▶ **Attach to the corporation's tax return.**

For calendar year 19 , or other tax year beginning ,19 , and ending , 19

Name

Employer identification number

Complete this form for credit for taxes paid on the following separate limitation categories of income. See instructions. **Use a separate Form 1118 for each category.** Check only one box on each form.

☐ Passive Income	☐ Dividends From a DISC or Former DISC
☐ High Withholding Tax Interest	☐ Taxable Income Attributable To Foreign Trade Income
☐ Financial Services Income	☐ Certain Distributions From a FSC or Former FSC
☐ Shipping Income	☐ General Limitation Income (see instructions)

☐ Dividends From **Each** Noncontrolled Section 902 Corporation (see instructions):
Name of Foreign Corporation ▶ Country of Incorporation ▶

Schedule A Separate Limitation Income or (Loss) Before Adjustments

1. Foreign Country or U.S. Possession (Enter two-letter code from page 8 of instructions. Use a separate line for each.)	2. Deemed Dividends (see instructions)		3. Other Dividends		4. Interest	5. Gross Rents, Royalties, and License Fees	6. Gross Income From Performance of Services	7. Other (attach schedule)	8. Total (add columns 2a through 7)
	(a) Exclude gross-up	(b) Gross-up (sec. 78)	(a) Exclude gross-up	(b) Gross-up (sec. 78)					
A									
B									
C									
D									
E									
F									
G									
H									
Totals (add lines A through H)									

Separate Limitation Deductions

(INCLUDE Foreign Branch and Section 863(b) Deductions here and on Schedule F—See instructions)

9. Definitely Allocable Deductions					10. Apportioned Share of Deductions Not Definitely Allocable (enter amount from applicable line of Schedule H, Part II, column (d))	11. Total Deductions (add columns 9e and 10)	12. Total Separate Limitation Income or (Loss) Before Adjustments (subtract column 11 from column 8)
Rental, Royalty, and Licensing Expenses		(c) Expenses Related to Gross Income From Performance of Services	(d) Other Definitely Allocable Deductions	(e) Total Definitely Allocable Deductions (add columns 9a through 9d)			
(a) Depreciation, Depletion, and Amortization	(b) Other Expenses						
A							
B							
C							
D							
E							
F							
G							
H							
Totals							

Schedule B Foreign Tax Credit

Part I—Foreign Taxes Paid, Accrued, and Deemed Paid

1. Credit is Claimed for Taxes:		2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)							3. Tax Deemed Paid (from Schedule C, Part I, column 9, and Schedule C, Part II, column 10)
		Tax Withheld at Source on:			Other Foreign Taxes Paid or Accrued on:				
☐ Paid	☐ Accrued	(a) Dividends	(b) Interest	(c) Rents, Royalties, and License Fees	(d) Section 863(b) Income	(e) Foreign Branch Income	(f) Services Income	(g) Other	
Date Paid	Date Accrued								
A									
B									
C									
D									
E									
F									
G									
H									
Totals (add lines A through H)									

Part II—Separate Limitation Foreign Tax Credit

1	Total foreign taxes paid or accrued (from Part I, column 2h, "Totals" line)	
2	Total taxes deemed paid (from Part I, column 3, "Totals" line)	
3	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G, Part II).	()
4	Carryback or carryover (attach schedule showing computation in detail—see Carryback and Carryover of Excess Foreign Taxes on page 3 of the instructions).	
5	Total foreign taxes (combine lines 1 through 4)	

Foreign Tax Credit Limitation:

6	<i>Numerator of Limitation Fraction.</i> —If required to complete Schedule J, enter the result from the applicable column of Schedule J, Part I, line 11. If not required to complete Schedule J, enter the result from the "Totals" line of column 12 of the applicable Schedule A.	
7a	Total taxable income from all sources (enter taxable income from the corporation's tax return)	
b	Adjustments to line 7a. (See instructions.)	
c	<i>Denominator of Limitation Fraction.</i> —Subtract line 7b from line 7a	
8	Divide line 6 by line 7c. (Enter the resulting fraction as a decimal less than 1.00000. If line 6 is greater than line 7c, enter 1.)	
9	Total U.S. income tax against which credit is allowed (regular tax liability (as defined in section 26(b)) minus possessions tax credit determined under section 936)	
10	Limitation (multiply line 8 by line 9). (See instructions.)	
11	Foreign tax credit (enter the smaller of line 5 or line 10 here and on the appropriate line of Part II).	

Part III—Summary of Separate Limitation Foreign Tax Credits from Schedule B, Part II of Separate Forms 1118 (Complete Only Once)

1	Credit for taxes on passive income	
2	Credit for taxes on high withholding tax interest.	
3	Credit for taxes on financial services income.	
4	Credit for taxes on shipping income.	
5	Credit for taxes on dividends from each noncontrolled section 902 corporation (combine all such credits on this line)	
6	Credit for taxes on dividends from a DISC or former DISC	
7	Credit for taxes on taxable income attributable to foreign trade income.	
8	Credit for taxes on certain distributions from a FSC or former FSC	
9	Credit for taxes on General Limitation Income	
10	Total (add lines 1 through 9)	
11	Reduction in credit for international boycott operations (see instructions)	
12	Total foreign tax credit (subtract line 11 from line 10). Enter here and on the corporation's tax return	

Schedule D

Tax Deemed Paid by First-Tier Foreign Corporations—Report all amounts in U.S. dollars unless otherwise specified.

Use this schedule to compute the tax deemed paid by a first-tier foreign corporation for dividends from a second-tier foreign corporation under section 902(b)(1).

Part I—Distributions From Post-1986 Earnings and Profits (Enter the column 9 results in Schedule C, Part I, column 5.)

[illegible]

Part II—Distributions From Pre-1987 Earnings and Profits (Enter the column 10 results in Schedule C, Part II, column 6.)

[illegible]

Schedule E
Tax Deemed Paid by Second-Tier Foreign Corporations—Report all amounts in U.S. dollars unless otherwise specified.

Use this schedule to compute the tax deemed paid by a second-tier foreign corporation for dividends from a third-tier foreign corporation under section 902(b)(2).

Part I—Distributions From Post-1986 Earnings and Profits (Enter the column 7 results in Schedule D, Part I, column 5.)

[illegible]

Part II—Distributions From Pre-1987 Earnings and Profits (Enter the column 8 results in Schedule D, Part II, column 6.)

[illegible]

Schedule F **Gross Income and Definitely Allocable Deductions From Sources Outside the U.S. Under Section 863(b) and for Foreign Branches**

1. Name of Foreign Country or U.S. Possession (Use a separate line for each.)	2. Gross Income	3. Definitely Allocable Deductions
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Part I—Section 863(b)

A		
B		
C		
D		
E		
F		
G		
H		

Totals (add lines A through H)* ▶

Part II—Foreign Branches

A		
B		
C		
D		
E		
F		
G		
H		

Totals (add lines A through H)* ▶

Schedule G **Reductions of Taxes Paid, Accrued, or Deemed Paid (Including Reduction for Taxes Under Section 901(j))**

1. Name of Foreign Country (Use a separate line for each.)	2. Taxable Income or (Loss)	3. Foreign Income Tax Paid, Accrued, or Deemed Paid
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Part I—Reduction of Taxes Under Section 901(j)

A		
B		
C		
D		
E		
F		
G		
H		

Total (add lines A through H). Enter here and on line B, Part II below.

Part II—Summary of Reductions of Taxes Paid, Accrued, or Deemed Paid

A	Reduction of Taxes Under Section 901(e)—Attach separate schedule	
B	Reduction of Taxes Under Section 901(j)—Enter total from Part I above	
C	Reduction of Oil and Gas Extraction Taxes—Enter amount from Schedule I, Part II, line 6	
D	Reduction of Taxes Due to International Boycott Provisions—Enter appropriate portion of Schedule C (Form 5713), line 2b. Important: Enter only "specifically attributable taxes" here.	
E	Reduction of Taxes for Section 6038(c) Penalty—Attach separate schedule	
F	Other Reductions of Taxes—Attach schedule(s)	

Total (add lines A through F). Enter here and on Schedule B, Part II, line 3. ▶

* **Note:** The Schedule F totals are not carried over to any other Form 1118 Schedule. (These totals were already included in Schedule A.) However, the IRS requires the corporation to complete Schedule F under the authority of section 905(b).

Schedule H Apportionment of Deductions Not Definitely Allocable (Complete Only Once)

Part I—Research and Development Deductions

	(a) Sales Method				(b) Gross Income Method—Check method used:		(c) Total R&D Deductions Not Definitely Allocable (enter all amounts from column (a)(v) or all amounts from column (b)(v)(ii))
	Product line #1 (SIC Code:)*	(i) Gross Sales	(ii) R&D Deductions	(iii) Gross Sales	(iv) R&D Deductions	(v) Total R&D Deductions Under Sales Method (add columns (ii) and (iv))	
1 Totals (see instructions)							
2 Total to be apportioned							
3 Apportionment among statutory groupings:							
a General limitation income							
b Passive income							
c High withholding tax interest							
d Financial services income							
e Shipping income							
f Dividends from noncontrolled section 902 corporation #1*							
g Dividends from noncontrolled section 902 corporation #2*							
h Taxable income attributable to foreign trade income							
4 Total foreign (add lines 3a through 3h)							

Part II—Interest Deductions, All Other Deductions, and Total Deductions

	(a) Average value of assets—Check method used:		(b) Interest Deductions		(c) All Other Deductions Not Definitely Allocable	(d) Totals (add the corresponding amounts from column (c), Part I; columns (b)(iii) and (b)(iv), Part II; and column (c), Part II). Enter each amount from lines 3a through 3j below in column 10 of the corresponding Schedule A.
	☐ Fair market value	☐ Tax book value	(i) Nonfinancial Corporations	(ii) Financial Corporations		
1a Totals (see instructions)						
b Amounts specifically allocable under Temp. Regs. 1.861-10T(e)						
c Other specific allocations under Temp. Regs. 1.861-10T						
d Other allocations (see instructions)						
2 Total to be apportioned (subtract lines 1b and 1c from line 1a)						
3 Apportionment among statutory groupings:						
a General limitation income						
b Passive income						
c High withholding tax interest						
d Financial services income						
e Shipping income						
f Dividends from noncontrolled section 902 corporation #1*						
g Dividends from noncontrolled section 902 corporation #2*						
h Taxable income attributable to foreign trade income						
i Certain distributions from a FSC or former FSC						
j Dividends from a DISC or former DISC						
4 Total foreign (add lines 3a through 3j)						

*** Important:** If the corporation has more than two product lines **OR** if it received dividends from more than two noncontrolled section 902 corporations, see instructions.