

# Instructions for Form 5471

(Rev. January 2024)

## Information Return of U.S. Persons With Respect to Certain Foreign Corporations

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Volume 4 of 4



Department of the Treasury  
**Internal Revenue Service**

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Department of the Treasury **Internal Revenue Service** [www.irs.gov](https://www.irs.gov)



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1. PTEP attributable to hybrid dividends under section 245A(e)(2) and reclassified as investments in U.S. property.
  2. PTEP attributable to section 1248 amounts under section 959(e) and reclassified as investments in U.S. property.
  3. PTEP attributable to section 1248 amounts from the gain on the sale of foreign corporation stock by a CFC and reclassified as investments in U.S. property.
- Column (e)(vi) is PTEP attributable to section 965(a) inclusions (section 959(c)(2) amounts). Do not include in column (e)(vi) E&P reported in column (e)(vii).
  - Column (e)(vii) is E&P treated as PTEP under section 965(b)(4)(A) (section 959(c)(2) amounts).

- Column (e)(viii) is PTEP attributable to section 951A inclusions (section 959(c)(2) amounts).
- Column (e)(ix) is PTEP described in the following three subgroups (which are aggregated into a single PTEP group) (section 959(c)(2) amounts).
  1. PTEP attributable to hybrid dividends under section 245A(e)(2).
  2. PTEP attributable to section 1248 amounts under section 959(e).
  3. PTEP attributable to section 1248 amounts from the gain on the sale of foreign corporation stock by a CFC.
- Column (x) is PTEP attributable to section 951(a)(1)(A) inclusions (section 959(c)(2) amounts) not otherwise described in the instructions for columns (e)(vi) through (ix).

Schedule J reports PTEP by subgroups because those groups may be subject to different rules under sections 960, 965(g), 245A(e)(3), and 986(c). The different rules are applicable for individuals, as well as corporations, estates, and trusts. For example, an individual U.S. shareholder who receives a distribution of PTEP originally attributable to inclusions under section 965(a) may only claim a credit for a portion of the foreign taxes attributable to a distribution of such PTEP. See section 965(g) and Regulations section 1.965-5 for more information. This is the case for both direct foreign tax credits (that is, those foreign taxes paid or accrued directly by the shareholder upon receipt of the PTEP distribution and allowed as a credit under section 901 or 903) and indirect foreign tax credits (that is, those taxes deemed paid by the shareholder with respect to taxes originally paid or accrued by the CFC under section 960(b)). With respect to direct

credits, this reduction applies regardless of whether such individual made an election under section 962. Therefore, the reporting on Schedule J is necessary regardless of whether the U.S. shareholder made a section 962 election.

### **Column (f)**

Use column (f) to report the opening and closing balances of the foreign corporation's accumulated E&P. This amount is the sum of post-2017 E&P not previously taxed, post-1986 undistributed earnings, pre-1987 E&P not previously taxed, and PTEP. Do not include column (d) amounts in the total reported in column (f).

### **Specific Instructions Related to Lines 1 Through 13**

**Line 1a.** Enter the balances for each column at the beginning of the tax year. These balances should equal the amounts reported

as the ending balances in the prior year Schedule J.

**Line 1b.** If there is a difference between last year's ending balance on Schedule J and the amount that should be last year's ending balance, taking into account modifications on Schedule J, include the difference on line 1b and attach an explanation for the difference. If there are multiple reasons for differences, include the explanation and amount of each such difference on the attachment. Do not include adjustments required to be reported on line 6 or 12.

**Lines 1a through 1c.** These lines of column (d) account for the balance of prior year hovering deficits and suspended taxes that have not yet been deducted. Such amounts are reported as negative numbers.

**Line 2a.** This line of column (d) is the unsuspended taxes under section 909 as a result of related income taken

into account by the foreign corporation, certain U.S. corporate owners of the foreign corporation, or a member of such U.S. corporate owner's consolidated group. Report the unsuspended taxes on line 2a of column (d) as a positive number. Report the unsuspended taxes as negative numbers on line 2a of column (a), (b), (c), or (e), as applicable.

**Line 2b.** This line of column (d) accounts for foreign income taxes that are suspended in the current tax year. Report such amounts as negative numbers.

**Line 3.** Enter the current year E&P (or deficit in E&P) amount from the applicable line 5c of Schedule H (Form 5471). For example, if you are completing Schedule J for the passive category (that is, you have entered "PAS" on line a at the top of page 1 of Schedule J), enter the current year E&P (or deficit in E&P) amount from Schedule H (Form 5471), line



5c(ii), in the applicable column. Line 3 should never have an amount entered in column (e).

**Line 4.** Report as a positive number

E&P attributable to distributions of PTEP from lower-tier foreign corporations. Generally, the E&P of a CFC attributable to amounts that are, or have been, included in the gross income of a U.S. shareholder under section 951(a) are not, when distributed through a chain of ownership described in section 958(a), also included in the gross income of another CFC in such chain for purposes of the application of section 951(a) to such other CFC with respect to such U.S. shareholder. See section 959(b).

**Line 5a.** Enter earnings carried over to a foreign surviving corporation after an acquisition by a foreign corporation of the assets of another foreign corporation in a transaction described in section 381. See Regulations section 1.367(b)-7. The amounts entered on line 5a may be negative or

positive. Negative amounts are hovering deficits reported in column (d) of line 5a.

**Line 5b.** If the foreign surviving corporation had a deficit in E&P prior to a transaction described in section 381, such deficit is recharacterized as a hovering deficit after such nonrecognition transaction. See section 381(c)(2)(B) and Regulations section 1.367(b)-7(d)(2)(i) (post-1986 undistributed earnings) and 1.367(b)-7(e)(1) (pre-1987 E&P not previously taxed). An amount equal to the deficit reported in column (a), (b), or (c) of line 5a is included as a positive amount on line 5b of column (a), (b), or (c), respectively. An amount equal to the total hovering deficits reported on line 5b of columns (a), (b), and (c) is included as a negative number in column (d) of line 5b.

**Line 6.** Attach a statement detailing the nature and amount of any adjustments not accounted for in the E&P determined before reduction for distributions and inclusions (that

is, adjustments other than those listed on lines 2a through 5b). Do not include amounts reported on line 1b. An example of an adjustment entered on line 6 is the foreign taxes imposed on receipt of a distribution of PTEP from a lower-tier foreign corporation.

**Example.** Domestic Corporation, a U.S. shareholder, wholly owns the only class of stock of CFC1, a foreign corporation. CFC1, in turn, wholly owns the only class of stock of CFC2, a foreign corporation. CFC2, in turn, wholly owns the only class of stock of CFC3, a foreign corporation. The functional currency of Domestic Corporation, CFC1, CFC2, and CFC3 is the U.S. dollar. During Year 1, Domestic Corporation reports an inclusion under section 951(a)(1) of \$100 as a result of subpart F income of CFC3. During Year 2, CFC3 distributes \$40 to CFC2. CFC2 pays withholding tax of \$4 on the distribution from CFC3. Such tax is related to previously taxed subpart F income. Domestic Corporation

reports on CFC2's Form 5471, Schedule J, line 4, column (e)(x), as a positive number, the \$40 PTEP distribution. Domestic Corporation reports on line 6, column (e)(x), as a negative number, the \$4 of tax on the PTEP distribution.

**Line 7.** Enter on line 7 E&P as of the close of the tax year before actual distributions or inclusions under section 951(a)(1) or section 951A during the year.

**Line 8.** Enter amounts included in gross income of the U.S. shareholder(s) under section 951(a)(1)(A) or section 951A with respect to the CFC. Report the inclusion as a negative amount in columns (a) through (c), as applicable. Report the inclusion as a positive amount in columns (e)(vi) through (e)(x), as applicable. Amounts reported as positive numbers on line 8 of column (e)(viii) should only be reported with respect to negative amounts on line 8 of column (a). The negative amounts could be reported on a

different Schedule J than the positive amounts if such amounts are reclassified from one separate category to another separate category.

**Note.** Section 951(a)(1)(A) inclusions are taken into account for the tax year before actual distributions and section 951(a)(1)(B) inclusions. See section 959.

**Note.** The amount included in gross income of U.S. shareholders of the CFC under section 951A might not be known if there is more than one U.S. shareholder. In that case, see the example in the instructions for Schedule P for reporting information.

**Note.** The amount reported in column (e)(viii) on line 8 will not necessarily equal the tested income reported on Schedule I-1. For an example of when this might occur, see Regulations section 1.951A-5(b)(2)(ii).

**Line 9.** Report actual distributions as negative numbers.

**Note.** Actual distributions are taken into account for the tax year before section 951(a)(1)(B) inclusions. See section 959(f)(2). An actual distribution is first out of PTEP, if any, and then out of the section 959(c)(3) balance. See section 959(c).

**Note.** The total of all amounts entered in Schedule R (Form 5471), column (d), must equal the amount on line 9, column (f), of the Schedule J (Form 5471) that is filed, or if more than one Schedule J (Form 5471) is filed, the Schedule J (Form 5471) with code "TOTAL" entered on line a of that Schedule J.

**Line 10.** Use line 10 to report reclassifications of section 959(c)(2) PTEP in columns (e)(vi) through (e)(x) to section 959(c)(1) PTEP in columns (e)(i) through (e)(v). A potential section 951(a)(1)(B) inclusion results in a reclassification of section 959(c)(2) PTEP, if any, to section 959(c)(1) PTEP before reclassification out of the section 959(c)(3) E&P balance. See section 959(a)(2)

and (f)(1). The amounts reclassified are reported as negative numbers in columns (e)(vi) through (e)(x) and positive numbers in columns (e)(i) through (e)(v), as applicable.

**Line 11.** Use this line to report E&P not previously taxed, which is treated as earnings invested in U.S. property and, therefore, reclassified to section 959(c)(1) PTEP (column (e)(iii)). The amounts reclassified are reported as negative numbers in columns (a) through (c) and positive numbers in column (e)(iii), as applicable.

**Line 12.** Attach a statement detailing the nature and amount of any adjustments in E&P not accounted for on lines 8 through 11. Do not include adjustments required to be reported on line 1b or line 6.

**Line 13.** The hovering deficit offset included in column (d) is reported as a positive number. The same amount entered in column (d) is reported as a negative number on line 13 of column (a) or (b), as appropriate. See

section 381(c)(2)(B) and Regulations section 1.367(b)-7(d)(2)(ii).

## **Schedule M**

Every U.S. person described in Category 4 must file Schedule M to report the transactions that occurred during the foreign corporation's annual accounting period ending with or within the U.S. person's tax year.

If a U.S. corporation that owns stock in a foreign corporation is a member of a consolidated group, list the common parent as the U.S. person filing Schedule M.

**Important.** In translating the amounts from functional currency to U.S. dollars, use the average exchange rate for the foreign corporation's tax year. See section 989(b). Report the exchange rate in the entry space provided at the top of Schedule M using the “divide-by convention” specified under Reporting exchange rates on Form 5471, earlier.



## **Name of person filing Form 5471.**

The name of the person filing Form 5471 is generally the name of the U.S. person described in the applicable category or categories of filers (see *Categories of Filers*, earlier). However, in the case of a consolidated return, enter the name of the U.S. parent in the field for "Name of person filing Form 5471."

**Reference ID number of foreign corporation.** Use the reference ID number shown on Form 5471, page 1, item 1b(2).

**Lines 4 and 19.** Report on these lines platform contribution transaction payments received and paid by the foreign corporation (without giving effect to any netting of payments). See Regulations section 1.482-7(b)(1)(ii).

**Lines 5 and 20.** Report on these lines cost sharing transaction payments received and paid by the foreign corporation (without

giving effect to any netting of payments). See Regulations section 1.482-7(b)(1) (i). The corporation is required to complete line 5 only if the corporation itself incurred intangible development costs. If the corporation does not itself incur intangible development costs, then it should only report cost sharing transaction payments made on line 20.

**Lines 9 and 24.** Report on line 9 the sum of tiered hybrid dividends received by the foreign corporation during its tax year. Report on line 24 the sum of hybrid dividends or tiered hybrid dividends paid by the foreign corporation during its tax year.

**Lines 10 and 25.** Report on these lines dividends received and paid by the foreign corporation not previously taxed under subpart F in the current year or in any prior year.

**Lines 13 and 28.** Report on these lines loan guarantee fees received (line 13) and loan guarantee fees paid (line 28). See section 482.

**Lines 14 and 29.** Report on these lines “other amounts received” (line 14) and “other amounts paid” (line 29).

If an amount is entered on line 14, you must attach a statement that includes the following information. Column (a) of the attached statement should provide a description of the type of other amounts received during the annual accounting period. Columns (b) through (f) should provide dollar amounts of the specified other amounts received during the annual accounting period by the foreign corporation from the persons listed in the headings for columns (b) through (f). These headings must comport to those used on the Schedule M (Form 5471) to which this statement is attached. The attached statement must include a “totals” line that

ties into the amounts reported in each column of line 14.

If an amount is entered on line 29, you must attach a statement that includes the following information. Column (a) of the attached statement should provide a description of the type of other amount paid during the annual accounting period. Columns (b) through (f) should provide dollar amounts of the specified other amounts paid during the annual accounting period by the foreign corporation to the persons listed in the headings for columns (b) through (f). These headings must comport to those used on the Schedule M (Form 5471) to which this statement is attached. The attached statement must include a "totals" line that ties into the amounts reported in each column of line 29.

**Lines 31 and 33.** Report on these lines the largest aggregate outstanding accounts receivable and payable balances during the year with the related parties described in

columns (b) through (f). Report only accounts receivable or payable arising in connection with the provision of services or the sale or processing of property. Only net accounts receivable and payable to the extent that the CFC's books net the accounts payable against the receivable as payment of the accounts receivable.

**Lines 32 and 34.** Report on these lines the largest outstanding balances during the year of gross amounts borrowed from, and gross amounts loaned to, the related parties described in columns (b) through (f). Do not enter aggregate cash flows, year-end loan balances, average balances, or net balances. Do not include an account receivable or payable balance arising in connection with the provision of services or the sale or processing of property if the amount of such balance does not, at any time during the tax year, exceed what is ordinary and necessary to carry on the trade or business. Any

outstanding balance from these transactions should be reported on the Balance Sheet (Form 5471, Schedule F, page 4) and possibly also on Schedule M, lines 31 and 33.

**Accrued payments and receipts.** A corporation that uses an accrual method of accounting must use accrued payments and accrued receipts for purposes of computing the total amount to enter on each line of Schedule M.

## **Schedule O**

Schedule O is used to report the organization or reorganization of a foreign corporation and the acquisition or disposition of its stock.

Every U.S. citizen or resident described in Category 2 must complete Part I. Every U.S. person described in Category 3 must complete Part II.

See Regulations section 1.6046-1(i) for rules on determining when U.S. persons constructively own stock of a foreign corporation and are therefore subject to the section 6046 filing requirements.

### **Name of person filing Form 5471.**

The name of the person filing Form 5471 is generally the name of the U.S. person described in the applicable category or categories of filers (see *Categories of Filers*, earlier). However, in the case of a consolidated return, enter the name of the U.S. parent in the field for "Name of person filing Form 5471."

**Reference ID number of foreign corporation.** Use the reference ID number shown on Form 5471, page 1, item 1b(2).

## **Part I**

**Column (d).** Enter the date the shareholder first acquired 10% or more (in value or voting power) of the outstanding stock of the foreign corporation.

**Column (e).** Enter the date the shareholder acquired (whether in one or more transactions) an additional 10% or more (in value or voting power) of the outstanding stock of the foreign corporation.

## **Part II**

### **Section A—General Shareholder Information**

If the shareholder's latest tax return was filed electronically, enter "e-filed" in column (b)(3) instead of a service center.

### **Section C—Acquisition of Stock**

Section C is completed by shareholders who are completing Schedule O because they have acquired sufficient stock in a foreign



corporation. If the shareholder acquired the stock in more than one transaction, use a separate line to report each transaction.

**Column (d).** Enter the method of acquisition (for example, purchase, gift, bequest, trade).

**Column (e)(2).** Enter the number of shares acquired indirectly (within the meaning of section 958(a)(2)) by the shareholder listed in column (a).

**Column (e)(3).** Enter the number of shares constructively owned (within the meaning of section 958(b)) by the shareholder listed in column (a).

## **Section D—Disposition of Stock**

Section D must be completed by shareholders who dispose of their interest (in whole or in part) in a foreign corporation.

**Column (d).** Enter the method of disposition (for example, sale, bequest, gift, trade).

**Example.** In 1999, Mr. Jackson, a U.S. citizen, purchased 10,000 shares of common stock of foreign corporation X. The purchase represented 10% ownership of the foreign corporation.

On July 1, 2023, Mr. Jackson made a gift of 5,000 shares of foreign corporation X to his son, John. Because Mr. Jackson has reduced his holding in the foreign corporation, he is required to complete Form 5471 and Schedule O. To show the required information about the disposition, Mr. Jackson completes Section D as follows.

- Enters his name in column (a).
- Enters "common" in column (b).
- Enters "July 1, 2023" in column (c).
- Enters "gift" in column (d).
- Enters "5,000" in column (e)(1).
- Enters "-0-" in column (f) because the disposition was by gift.

- Enters the name and address of his son, John, in column (g).

## **Section F—Additional Information**

**Item (b).** List the date of any reorganization of the foreign corporation that occurred during the last 4 years while any U.S. person held 10% or more in value or vote (directly or indirectly) of the corporation's stock. If there is more than one such date, use the most recent date. However, do not enter a date for which information was reported in Section E. Instead, enter the date (if any) of any reorganization prior to that date (if it is within the last 4 years).

***Example for item (c).*** Mr. Lyons, a U.S. person, acquires a 10% ownership in foreign corporation F. F is the 100% owner of two foreign corporations, FI and FJ. F is also a 50% owner of foreign corporation FK. In addition, F is 90% owned by foreign corporation W. Mr. Lyons does not own any of the stock of corporation W.

Mr. Lyons completes and files Form 5471 and Schedule O for the corporations in which he is a 10%-or-more shareholder. Mr. Lyons is also required to submit a chart if the foreign corporation is a member of a chain of corporations, and to indicate if he is a 10%-or-more shareholder in any of those corporations.

Mr. Lyons would prepare a list showing the corporations as follows.

- Corporation W.
- Corporation F.
- Corporation FI.
- Corporation FJ.
- Corporation FK.

Then Mr. Lyons is required to indicate that he is a 10%-or-more shareholder in corporations F, FI, and FJ.

## Schedule P

Use Schedule P to report the PTEP in the U.S. shareholder's annual PTEP accounts with respect to a CFC in the CFC's functional currency (Part I) and the U.S. shareholder's U.S. dollar basis in that PTEP (Part II). For purposes of the preceding sentence, a CFC includes an SFC that is only treated as a CFC for limited purposes under section 965(e)(2).

**Note.** A separate Schedule P must be completed by each Category 1a, 1b, 4, 5a, or 5b filer.

If a U.S. shareholder wholly owns the CFC, Schedule P should include the same information reported on Schedule J, Part I, column (e). If there is more than one U.S. shareholder, the amounts reported on Schedule P with respect to each U.S. shareholder might be different from the amounts reported on Schedule J.

**Example.** Corporation A, a domestic corporation, owns 50% of the only class of stock of CFC1, and Corporation B, a domestic corporation, owns the remaining 50% of the stock of CFC1. Corporation A wholly owns the only class of stock of CFC2. The functional currency of all corporations is the U.S. dollar. CFC1 has tested income of \$100x and CFC2 has tested loss of \$30x. See section 951A(c)(2). Neither Corporation A nor Corporation B has any net deemed tangible income return that would reduce the GILTI inclusion of Corporation A or B. Corporation A has a section 951A inclusion of \$20 because its pro rata share of CFC1's tested income (\$50x) is offset by its pro rata share of CFC2's tested loss (\$30x). Corporation B has a section 951A inclusion of \$50x. On Schedule P of the Form 5471 with respect to CFC1 filed by Corporation B, Corporation B will report on line 7, column (h), \$50x of PTEP as a result of its section 951A inclusion with respect to CFC1. Corporation A will report \$20x of PTEP

as a result of its section 951A inclusion on its Form 5471, Schedule P, line 7, column (h), with respect to CFC1.

The Form 5471, Schedule J, for CFC1 should include PTEP of \$70x with respect to the aggregate section 951A inclusions of Corporation A and Corporation B. However, if Corporation A does not know Corporation B's section 951A inclusion at the time Corporation A files its Form 5471, Corporation A will only be able to complete Schedule J, Part I, with respect to its PTEP of \$20x on line 8, column (e)(viii). Similarly, Corporation B will only be able to complete Schedule J, Part I, with respect to its PTEP of \$50x on line 8, column (e)(viii). In the following year, Corporation A and Corporation B should each report the other corporation's PTEP on Schedule J, Part I, line 1b, column (e)(viii), and the corresponding reduction to CFC1's E&P described in section 959(c)(3) on Schedule J, Part I, line 1b, column (a).

## **Name of person filing Form 5471.**

The name of the person filing Form 5471 is generally the name of the U.S. person described in the applicable category or categories of filers (see *Categories of Filers*, earlier). However, in the case of a consolidated return, enter the name of the U.S. parent in the field for "Name of person filing Form 5471."

**Reference ID number of foreign corporation.** If applicable, use the reference ID number shown on Form 5471, page 1, item 1b(2).

**Lines a and b.** Complete a separate Schedule P for each applicable separate category of income. Enter the appropriate code on line a (at the top of page 1 of Schedule P). To determine the appropriate code, see *Categories of Income* in the Instructions for Form 1118.



A foreign corporation may have PTEP in a PTEP group within any of the separate categories of income, with the exception of foreign branch category income. See Regulations section 1.960-3(c)(1).

If code 901j is entered on line a, enter on line b the country code for the sanctioned country using the two-letter code (from the list at [IRS.gov/CountryCodes](https://www.irs.gov/CountryCodes)).

**Note.** A separate Schedule P should not be completed for the section 951A category. Reclassified section 951A PTEP and section 951A PTEP that is in the section 951A category should be reported on the Schedule P completed for the general category.

**Note.** For purposes of this Schedule P, include in each separate category of income, foreign source and U.S. source income.

**Important.** In addition to the separate category codes referred to above, if you have more than one of the categories of income

referred to above, you must complete and file a separate Schedule P using code "TOTAL" that aggregates all amounts listed for each line and column of all other Schedules P.

## **Part I**

Enter amounts in the functional currency of the foreign corporation as reported on Form 5471, page 1, item 1h.

Pre-1987 U.S. dollar PTEP should be translated into the foreign corporation's functional currency using the rules of Notice 88-70 and added to post-1986 amounts in the appropriate PTEP category.

## **Part II**

**Dollar basis.** Enter amounts in U.S. dollars. The U.S. shareholder's U.S. dollar basis in PTEP is generally equal to the U.S. dollar amount of E&P that the U.S. shareholder previously included in gross income. See section 989(b)(1) and (3); and Regulations

sections 1.951A-1(d)(1) and 1.965-1(b)(1) and (2).

The U.S. shareholder's U.S. dollar basis is used by the U.S. shareholder to determine the amount of foreign currency gain or loss on the PTEP that the U.S. shareholder is required to recognize under section 986(c).

**Columns (a) through (k).** Use columns (a) through (k) to report the opening balance of, current year additions and subtractions to, and the closing balance of, the PTEP in the U.S. shareholder's annual PTEP accounts with respect to a CFC.

Columns (a) through (j) of Schedule P correspond to Schedule J, columns (e)(i) through (e) (x). See Schedule J, earlier, for specific line instructions.

**Line 1b.** If there is a difference between last year's ending balance on Schedule P and the amount that should be last year's ending balance, taking into account modifications on

Schedule P, include the difference on line 1b and attach an explanation for the difference. If there are multiple differences, include the explanation and amount of each such difference on the attachment.

## **Schedule Q**

Use Schedule Q to report the CFC's income, deductions, taxes, and assets by CFC income groups for purposes of section 960(a) and (d).

In general, a taxpayer that is subject to tax as a domestic corporation that is a U.S. shareholder ("corporate U.S. shareholder") of a CFC is deemed to pay all or a portion of the foreign income taxes paid or accrued by the CFC that are properly attributable to subpart F income or tested income included in gross income by the corporate U.S. shareholder. See section 960(a) and (d). A corporate U.S. shareholder may claim a credit for such foreign taxes, subject to certain limitations.

**Note.** If an individual, estate, or trust that is a U.S. shareholder of a CFC makes an election under section 962 (“962 electing shareholder”), any inclusions under section 951 or 951A of the U.S. shareholder will be treated as received by a corporate U.S. shareholder for purposes of section 960. See section 962(b) and Regulations section 1.962-2(b). As a result, these U.S. shareholders may also claim a foreign tax credit for foreign income taxes deemed paid with respect to such inclusions. See sections 962(a)(1) and 951A(f)(1)(A).

**Note.** See also section 1293(f) for inclusions with respect to a PFIC.

To calculate the foreign taxes deemed paid by the corporate U.S. shareholder (including a 962 electing shareholder), determine for each of its CFCs the income, deductions, and taxes that are assigned to each separate category of income and each income group within each separate category. See Regulations section

1.960-1(c)(1). The income groups include the subpart F income groups, the tested income group, and the residual income group.

## **Computer-Generated Schedule Q**

Expand the Schedule Q if you are reporting with respect to more than two units.

Specifically, if you are reporting with respect to more than two units, add to pages 1 to 4, as appropriate, new lines (3), (4), (5), etc., in all necessary locations.

## **Specific Instructions for Schedule Q**

### **Name of person filing Form 5471.**

The name of the person filing Form 5471 is generally the name of the U.S. person described in the applicable category or categories of filers (see *Categories of Filers*, earlier). However, in the case of a consolidated return, enter the name of the U.S. parent in the field for "Name of person filing Form 5471."

**Reference ID number of foreign corporation.** If applicable, use the reference ID number shown on Form 5471, page 1, item 1b(2).

**Line A.** Complete a separate Schedule Q for each applicable separate category of income. Enter the appropriate code from the table below for the separate category of income with respect to which the Schedule Q is being completed.

### **Codes for Categories of Income**

| Code | Category of Income      |
|------|-------------------------|
| PAS  | Passive category income |
| 901j | Section 901(j) income   |
| GEN  | General category income |

If code 901j is entered on line A, enter on line 1m, column (i), the country code for the sanctioned country using the two-letter code (from the list at [IRS.gov/ CountryCodes](https://www.irs.gov/CountryCodes)).

**Important.** In addition to the separate category codes referred to above, if you have more than one of the categories of income referred to above, you must complete and file a separate Schedule Q using code "TOTAL" that aggregates all amounts listed for each line and column in all other Schedules Q.

**Line B.** If category code "PAS" is entered on line A, a separate Schedule Q must be completed for each applicable grouping under Regulations section 1.904-4(c)(3).

See Regulations sections 1.954-1(c)(1)(iii)(B) and 1.904-4(c)(3) through (5). Enter on line B the appropriate code from the table below for each of the following groups under Regulations section 1.904-4(c)(3).



## Codes for Passive Groups

| <b>Code</b> | <b>Passive Group</b>  |
|-------------|---|
| i           | All passive income received during the tax year that is subject to a withholding tax of 15% or greater must be treated as one item of income. See Regulations section 1.904-4(c)(3)(i).                         |
| ii          | All passive income received during the tax year that is subject to a withholding tax of less than 15% (but greater than zero) must be treated as one item of income. See Regulations section 1.904-4(c)(3)(ii). |
| iii         | All passive income received during the tax year that is subject to no withholding tax or other foreign tax must be treated as one item of income. See Regulations section 1.904-4(c)(3)(iii).                   |

|    |  |
|----|--|
| iv | All passive income received during the tax year that is subject to no withholding tax but is subject to foreign tax other than a withholding tax must be treated as one item of income. See Regulations section 1.904-4(c)(3)(iv). |
|----|--|

**Note.** The grouping rules of Regulations section 1.904-4(c)(3)(i) through (iv) apply separately to income attributable to each tested unit of a CFC. See Regulations section 1.904-4(c)(4). This is one reason that, in the case of a CFC, tested-unit-by-tested-unit reporting is required with respect to the income groups on lines 1a through 1j and lines 3 and 4. A foreign corporation that is not a CFC but that is a noncontrolled 10%-owned foreign corporation must report this information on a foreign-QBU-by-foreign-QBU basis. This would be the case, for example, if you are completing Schedule Q for purposes

of attaching it to Schedules K-2 and K-3 for purposes of section 1293(f).

To figure the amounts to enter on lines 1a through 1j, on lines (1), (2), etc., under each line 1a through 1j, enter the name of each unit of the foreign corporation (the relevant unit being each tested unit in the case of a CFC and each QBU in the case of a 10%-owned foreign corporation), including the foreign corporation itself, and the information required in each column (i) through (xvi) with respect to the amount in each subpart F income group within each category for each unit.

On lines (1), (2), etc., under line 4, enter the name of each unit and enter the information required for columns (i) through (xvi) for each unit, but do not enter amounts excluded from subpart F income under the subpart F high-tax exception (those amounts are reported on lines (1), (2), etc., under lines 1a through 1j) or tested income under the GILTI

high-tax exclusion (those amounts are reported on lines (1), (2), etc., under line 3).

**Line C.** If code 901j is entered on line A, enter the country code for the sanctioned country using the two-letter code from the list at [IRS.gov/CountryCodes](https://www.irs.gov/CountryCodes).

**Line D.** Taxpayers are generally required to complete a separate Schedule Q for foreign source income in each separate category and U.S. source income in each separate category. On a given Schedule Q, taxpayers are generally required to check the box for either foreign source income or U.S. source income, as applicable. However, if a taxpayer has entered code "TOTAL" on line A and the total reported on that Schedule Q includes both foreign source income and U.S. source income, the taxpayer may check both boxes on line D.

**Line E.** A separate Schedule Q is required for foreign oil and gas extraction income (FOGEI) and foreign oil related income (FORI). If the

Schedule Q is being prepared to report the FOGEI or FORI of a CFC, check the box for line E. Indicate the amount of FOGEI and FORI in each income group.

## **Line 1. Subpart F Income Groups**

The separate subpart F income groups within each applicable section 904 category of a CFC are on line 1 ("subpart F income groups"). See Regulations section 1.960-1(d)(2)(ii) (B). Each single item of foreign base company income (as defined in Regulations section 1.954-1(c)(1)(iii)) is a separate subpart F income group. With respect to a CFC, Regulations section 1.954-1(c)(1)(iii)(A)(2) identifies as a single item of income all foreign base company income (other than foreign personal holding company income) that falls within both a single separate category (typically, general category income) and a single category of foreign base company income described in each of Regulations section 1.954-1(c)(1)(iii)

(A)(2)(i) through (v). For example, with respect to line 1g, there is a single subpart F income group within the general category that consists of all of a CFC's foreign base company sales income.

Use lines 1a through 1f to enter the passive category foreign personal holding company income of the CFC under the appropriate income group (dividends, interest, rents, royalties, and annuities; net gain from certain property transactions; net gain from commodities transactions; net foreign currency gain; income equivalent to interest; and other passive category foreign personal holding company income of the CFC), each of which is also treated as a separate subpart F income group under Regulations section 1.960-1. See Regulations section 1.954-1(c)(1)(iii)(B).

**Note.** Enter the following passive category foreign personal holding company income of the CFC on line 1f (other foreign personal holding company income).

- Income from notional principal contracts.
- Payments in lieu of dividends.
- Personal service contracts.

See section 954(c)(1)(F) through (H).

Attach a statement that includes all of the information requested by Schedule Q, line 1f, delineating the amount on line 1f for each of the three groups reporting on line 1f. For example, if both payments in lieu of dividends and income from notional principal contracts are included on line 1f, on the statement, identify the amount related to each of those income groups for each column of line 1f.

Use lines 1g through 1j to enter the foreign base company sales income, foreign base company services income, full inclusion

income, and insurance income described in section 952(a)(1) of the CFC.

To figure the amounts to enter on lines 1a through 1j, on lines (1), (2), etc., under each line 1a through 1j, enter the name of each QBU of the CFC, including the CFC itself, and the information required in each column (i) through (xvi) with respect to the amount in each subpart F income group within each category for each QBU. On lines 1a through 1j, enter the total for each column by adding the amounts on lines (1), (2), etc., excluding from such total any amounts reported with respect to income excluded from subpart F income under the high-tax exception in section 954(b)(4) ("subpart F high-tax exception"). These amounts are included in the total amount of residual income, which is reported on line 4. As a result, the amounts included on lines 1a through 1j for each column may not equal the sum of the amounts reported on lines (1), (2), etc., for



each column because any item excluded from subpart F income by reason of the high-tax election is included in the summation on line 4 instead of the summations on lines 1a through 1j. See the instructions for column (xiv) and line 4.

**Example.** For line 1a(1), gross income of \$50 is reported in column (ii), foreign tax of \$20 is reported in each of columns (x) and (xii), and the checkbox in column (xiv) is checked. For line 1a(2), gross income of \$100 is reported in column (ii), \$5 of foreign tax is reported in each of columns (x) and (xii), and the checkbox in column (xiv) is not checked. For line 1a(3), gross income of \$75 is reported in column (ii), \$3 of foreign tax is reported in each of columns (x) and (xii), and the checkbox in column (xiv) is not checked. As a result, the amount reported in column (ii) on line 1a is the sum of the amounts reported in column (ii) on lines 1a(2) and 1a(3), which is equal to \$175 (\$100 + \$75). The amounts

reported in columns (x) and (xii) on line 1a are the sum of the amounts reported in each column on lines 1a(2) and 1a(3), which is equal to \$8 (\$5 + \$3). The items reported on line 1a(1), gross income of \$50 and \$20 of foreign tax, are not included in the totals reported on line 1a. These amounts are included in the totals for each respective column on line 4. As a result, the amount reported on line 4, column (ii), is increased by \$50 and the amount reported in column (x) on line 4 is increased by \$20. No amount is reported on line 4, column (xii), because foreign income taxes attributable to high-tax exception or high-tax exclusion income are not creditable.

On lines 1k through 1m, enter international boycott income described in section 952(a)(3); illegal bribes, kickbacks, and other payments described in section 952(a) (4); and income included in a section 901(j) separate category described in section

952(a)(5). See Regulations section 1.960-1(d)(2)(ii)(B)(2).

## **Line 2. Recaptured Subpart F Income**

Enter income that is recaptured as subpart F income in the current year. See section 952(c)(2).

## **Line 3. Tested Income Group**

Use line 3 to report tested income in the tested income group of the CFC (a “tested income group”). See Regulations section 1.960-1(d)(2)(ii) (C). On lines (1), (2), etc., under line 3, enter the name of each tested unit of the CFC (including the CFC tested unit itself) and enter for each tested unit the information required in columns (ii) through (xvi), based on the tentative gross tested income attributable to each tested unit (without regard to any amounts excluded under the GILTI high-tax exclusion in Regulations section 1.951A-2(c)(7) (“GILTI high-tax exclusion”). If the GILTI high-tax

exclusion applies with respect to any tested unit of the CFC, include the amounts reported for columns (ii) through (xiii) and (xvi) in the total reported on line 4. See the instructions for line 4. As a result, the total amount entered on line 3 may not equal the sum of the amounts reported in columns (ii) through (xiii) and (xvi) on lines 3(1), 3(2), etc., if any tested unit's tentative tested income is excluded under the GILTI high-tax exclusion (these amounts are included in the total amounts reported on line 4). In general, tested income will be in a single tested income group within the general category. Because a CFC cannot earn section 951A category income or foreign branch category income at the CFC level, there is no tested income group within either section 904 category. With respect to the general category tested income group of a CFC, GILTI inclusion amounts and taxes with respect to the tested income group will generally be treated as income and deemed paid taxes in

the section 951A category. See Regulations sections 1.904-4(g) and 1.904-6(e).

## **Line 4. Residual Income Group**

Use line 4 to report the information required in columns (i) through (xvi) that is in a section 904 category but that is not of a type that is included in one of the subpart F income groups or a tested income group and is therefore assigned to the residual income group. See Regulations section 1.960-1(d)(2)(ii)(D). Enter the name of each QBU and enter the information required for columns (i) through (xvi) for each QBU on lines 4(1), 4(2), etc., but do not enter amounts excluded from subpart F income under the subpart F high-tax exception (those amounts are reported on lines (1), (2), etc., under lines 1a through 1j) or tested income under the GILTI high-tax exclusion (those amounts are reported on lines 3(1), 3(2), etc.,). Enter the sum of the amounts reported on lines 4(1), 4(2), etc., plus the sum of

amounts excluded from subpart F income under the subpart F high-tax exception and tested income under the GILTI high-tax exclusion, in the appropriate column on line 4.

**Example.** For line 1a(1), \$100 of gross income is reported in column (ii), \$35 of foreign tax is reported in each of columns (x) and (xii), and the checkbox in column (xiv) is checked. For line 1a(2), \$75 of gross income is reported in column (ii), \$5 of foreign tax is reported in each of columns (x) and (xii), and the checkbox in column (xiv) is not checked. For line 3(1), \$200 of gross income is reported in column (ii), \$70 of foreign tax is reported in each of columns (x) and (xii), and the checkbox in column (xiv) is checked. For line 3(2), \$150 of gross income is reported in column (ii), \$10 of foreign tax is reported in each of columns (x) and (xii), and the checkbox in column (xiv) is not checked. For line 4(1), \$300 of gross income is reported in

column (ii) and \$105 of foreign tax is reported in column (x). On line 4(1), both columns (xii) and (xiv) should be blank in all cases. As a result, the amount reported on line 4 for column (ii) is the sum of the amounts reported in column (ii) on lines 1a(1), 3(1), and 4(1), which equals \$600 (\$100 + \$200 + \$300). The amount reported in column (x) of line 4 is the sum of the amounts reported in column (x) on lines 1a(1), 3(1), and 4(1), which equals \$210 (\$35 + \$70 + \$105). No amount should be reported in column (xii) of line 4 as foreign tax on residual amounts are not creditable. The amounts reported on line 1a(1) would not be included in the total for line 1a, but the amount reported on line 1a(2) would be included in the total reported on line 1a. Similarly, the amounts reported on line 3(1) would not be included in the total reported on line 3, but the amounts reported on line 3(2) would be reported in the total reported on line 3.

**Column (i).** Consistent with the reporting requirement on Form 1118, enter the two-letter code (from the list at [IRS.gov/CountryCodes](https://www.irs.gov/CountryCodes)) of each foreign country and U.S. territory within which income is sourced and/or to which taxes were paid or accrued.

**Column (ii).** Enter the amount of gross income of the CFC that is assigned to each income group within each section 904 category.

**Columns (iii) through (vii). Expenses.** Deductions of the CFC, including for current year taxes, are allocated and apportioned to the income groups to determine net income (or loss) in each income group and to identify the current year foreign income taxes that relate to the income in each income group for section 960 purposes. See Regulations section 1.960-1(c)(1) and 1.960-1(d)(3)(ii). Enter the expenses allocated and apportioned to the item of gross income reported for each QBU



or tested unit as well as the aggregate amount of such expenses allocated and apportioned to each group. See the instructions for lines 1 through 4.

**Column (viii). Current year tax on reattributed income from disregarded payments.** This column is used to report current year tax imposed solely by reason of the receipt of a disregarded payment that is a reattribution payment. The current year tax is allocated and apportioned to the income group to which an amount of gross income is assigned by reason of the receipt of the reattribution payment. See Regulations sections 1.960-1(d)(3)(ii) (A) and 1.861-20(d)(3)(v)(B). Report current year taxes allocated and apportioned to the item of gross income reported for each QBU or tested unit as well as the aggregate amount of such foreign taxes in each group. See the instructions for lines 1 through 4.

**Column (ix). Current year tax on all other disregarded payments.** This column is used to report current tax imposed solely by reason of the receipt of a disregarded payment other than a reattribution payment, and which is therefore either a remittance or a contribution. See Regulations section 1.861-20(d)(3)(v) (C). Foreign tax imposed by reason of a disregarded payment that is a remittance is assigned to the income groups based upon the assets of the payor. See Regulations section 1.861-20(d)(3)(v)(C)(1). Foreign tax imposed by reason of a disregarded payment that is a contribution is assigned to the residual grouping. See Regulations section 1.861-20(d) (3)(v)(C)(2). Report current year taxes allocated and apportioned to the item of gross income reported for each QBU or tested unit as well as the aggregate amount of such foreign taxes allocated and apportioned to each group. See the instructions for lines 1 through 4.

**Column (x). Other current year taxes.**

Any other current year tax is allocated and apportioned among the section 904 categories under the rules of Regulations section 1.904-6(a) based on the portion of the foreign taxable income (as characterized under federal income tax principles) that is assigned to a particular section 904 category. Any other current year foreign tax is allocated to the CFC income group to which the items of foreign gross income are assigned under the rules of Regulations section 1.861-20. Report current year taxes allocated and apportioned to the item of gross income reported for each QBU or tested unit as well as the aggregate amount of such foreign taxes allocated and apportioned to each group. See the instructions for lines 1 through 4.

**Column (xii). Foreign taxes for which credit is allowed (U.S. dollars).** The amount reported in column (xii) may not be

the same as the sum of the amounts in columns (viii) through (x) if columns (viii) through (x) include taxes that are not creditable, including taxes paid or accrued to sanctioned countries; foreign taxes disallowed under section 901(k), (m), and (l); and taxes paid or accrued to the United States.

**Column (xiii). Average asset value.**

Foreign gross income that arises from a disregarded payment that is treated as a remittance for U.S. tax purposes is assigned to an income group by reference to the income groups to which the assets of the payor taxable unit are assigned (or would be assigned if the taxable unit were a U.S. person) under the rules of Regulations section 1.861-9 for purposes of apportioning interest expense. This rule uses the payor's asset apportionment percentages as a proxy for the accumulated earnings of the payor taxable unit from which the remittance is made. For this purpose, the assets of the taxable unit

making the remittance are determined in accordance with the rules of Regulations section 1.987-6(b) that apply in determining the source and separate category of exchange gain or loss on a section 987 remittance, as modified in two respects. See Regulations section 1.861-20(d)(3)(v)(C)(1). Report asset values for each QBU or tested unit as well as the aggregate amount of assets in each group. See the instructions for lines 1 through 4.

**Column (xiv). High-tax election.** Check the box in column (xiv) of the line corresponding to any item of income with respect to which the subpart F high-tax exception applies. If any amount is excluded under the subpart F high-tax exception, do not include it in the total for lines 1a through 1j, but instead add the amount to the total for line 4. See the instructions for lines 1 and 4. If a GILTI high-tax exclusion under Regulations section 1.951A-2(c)(7)(viii) is

effective with respect to the CFC for the CFC inclusion year, check the box in column (xiv) that corresponds to the item(s) of income to which the exception applies. If an amount reported on line 3(1), 3(2), etc., is excluded from gross income under the GILTI high-tax exclusion, do not include it in the total amount for line 3. Instead, include the amounts in the total for line 4. See the instructions for lines 3 and 4.

**Column (xv). Loss allocation.** This column is used to report a reduction to subpart F income in each applicable income group when the foreign corporation's subpart F income exceeds current year E&P. See Regulations sections 1.952-1(c) and (e) and 1.951A-6.

## **Schedule R**

Schedule R is used to report basic information pertaining to distributions from foreign corporations. This information is required by sections 245A, 959, and 986(c).

## **Name of Person Filing Form 5471**

The name of the person filing Form 5471 is generally the name of the U.S. person described in the category or categories of filers (see *Categories of Filers*, earlier).

However, in the case of a consolidated return, enter the name of the U.S. parent in the field for "Name of person filing Form 5471."

## **Reference ID Number of Foreign Corporation**

If applicable, use the reference ID number shown on Form 5471, page 1, item 1b(2).

### **Column (a). Description of distribution.**

The description should include whether the distribution was cash or noncash and taxable or nontaxable to shareholders. Use code sections to properly identify the taxable or nontaxable consequences of the distribution. For example, "taxable cash dividend eligible for a dividends received deduction under section 245A" or "nontaxable cash distribution

of PTEP.” Report parts of a distribution on separate rows if the distribution is partially taxable and partially nontaxable, or if the distribution is either taxable or nontaxable by reason of different Code sections. For example, a cash distribution of \$100 that is a nontaxable distribution of PTEP under section 959(a) of \$30, a taxable dividend eligible for a dividends received deduction under section 245A of \$15, a taxable dividend under section 301(c)(1) of \$25, a nontaxable distribution applied against basis under section 301(c)(2) of \$10, and a taxable distribution treated as gain from the sale or exchange of property under section 301(c)(3) of \$20 would be reported on five rows.

If noncash distributions were made, attach a statement and show both the tax bases and FMVs.

**Column (b). Date of distribution.** Enter the month, day, and year using the following



format: MM-DD-YYYY. For example, June 30, 2023, would be entered as "06-30-2023."

**Column (c). Amount of distribution in foreign corporation's functional**

**currency.** The amount of a distribution is generally the amount of any money paid to the shareholder plus the FMV of any property transferred to the shareholder. However, this amount is reduced (but not below zero) by the following liabilities.

- Any liability of the corporation the shareholder assumes in connection with the distribution.
- Any liability to which the property is subject immediately before, and immediately after, the distribution.

**Column (d). Amount of E&P distribution in foreign corporation's functional**

**currency.** A corporate distribution to a shareholder is generally treated as a distribution of E&P. Report distributions from

current and accumulated E&P. Do not report any part of a distribution that is not from E&P in column (d).

An actual distribution is first out of PTEP, if any, and then out of the section 959(c)(3) balance. See section 959(c).

If PTEP were distributed, include on Form 5471, Schedule I, line 6, any foreign currency gain or loss on the distribution that is recognized under section 986(c). See the instructions for Schedule I, Line 6, earlier, for details. With respect to foreign currency gain or loss on a distribution of PTEP, for a corporate U.S. shareholder, include the gain or (loss) as "Other income" on Form 1120, line 10, or on the comparable line of other corporate tax returns. For a noncorporate U.S. shareholder, include the result as "Other income" on Schedule 1 (Form 1040), line 8z, or on the comparable line of other noncorporate tax returns.

**Note.** E&P described in section 959(c)(3) is generally E&P of the foreign corporation that has not been included in gross income of a U.S. shareholder under section 951(a)(1) or section 951A.

**Note.** Amounts entered in Schedule R (Form 5471), column (d), are also included on line 9, column (f), of Schedule J (Form 5471) and Part I, line 8, of Schedule P (Form 5471), both of which are completed by separate category of income. If the filer is required to complete Schedule J (Form 5471) with respect to more than one category of income, the total of all amounts entered in Schedule R (Form 5471), column (d), should equal the amount entered on line 9, column (f), of the Schedule J (Form 5471) that is filed with code "TOTAL" entered on line a of that Schedule J.

**Paperwork Reduction Act Notice.** We ask for the information on this form to carry out the Internal Revenue laws of the United States. You are required to give us the

information. We need it to ensure that you are complying with these laws and to allow us to figure and collect the right amount of tax.

You are not required to provide the information requested on a form that is subject to the Paperwork Reduction Act unless the form displays a valid OMB control number. Books or records relating to a form or its instructions must be retained as long as their contents may become material in the administration of any Internal Revenue law. Generally, tax returns and return information are confidential, as required by section 6103.

The time needed to complete and file this form will vary depending on individual circumstances. The estimated burden for individual and business taxpayers filing this form is approved under OMB control number 1545-0074 and 1545-0123 and is included in the estimates shown in the instructions for their individual and business income tax return.



# Principal Business Activity Codes

|   |   |   |   |
|---|---|---|---|
| <div><div><div>Principal Business Activity Codes</div><div>This list of principal business activities and their associated codes is designed to classify an enterprise by the type of activity in which it is engaged to facilitate the administration of the Internal Revenue Code. These principal business activity codes are based on the North American Industry Classification System.</div></div><div><div>Using the list of activities and codes below, determine from which activity the company derives the largest percentage of its "total receipts." If the company purchases raw materials and supplies them to a subcontractor to produce the finished product, but retains title to the product, the company is considered a manufacturer and must</div><div>use one of the manufacturing codes (311110-339900).</div><div>Enter on page 1, Item 1f, the six-digit code selected from the list below. In item 1g, enter a brief description of the company's business activity.</div></div></div>   |   |   |   |
| <div><div>Agriculture, Forestry, Fishing, and Hunting</div><div>Crop Production</div><div>111100 Oilseed &amp; Grain Farming</div><div>111210 Vegetable &amp; Melon Farming (including potatoes &amp; yams)</div><div>111300 Fruit &amp; Tree Nut Farming</div><div>111400 Greenhouse, Nursery, &amp; Floriculture Production</div><div>111900 Other Crop Farming (including tobacco, cotton, sugarcane, hay, peanut, sugar beet &amp; all other crop farming)</div><div>Animal Production</div><div>112111 Beef Cattle Ranching &amp; Farming</div><div>112112 Cattle Feedlots</div><div>112120 Dairy Cattle &amp; Milk Production</div><div>112210 Hog &amp; Pig Farming</div><div>112300 Poultry &amp; Egg Production</div><div>112400 Sheep &amp; Goat Farming</div><div>112510 Aquaculture (including shellfish &amp; finfish farms &amp; hatcheries)</div><div>112900 Other Animal Production</div><div>Forestry and Logging</div><div>113110 Timber Tract Operations</div><div>113210 Forest Nurseries &amp; Gathering of Forest Products</div><div>113310 Logging</div><div>Fishing, Hunting, and Trapping</div><div>114110 Fishing</div><div>114210 Hunting &amp; Trapping</div><div>Support Activities for Agriculture and Forestry</div><div>115110 Support Activities for Crop Production (including cotton ginning, soil preparation, planting, &amp; cultivating)</div><div>115210 Support Activities for Animal Production (including farriers)</div><div>115310 Support Activities For Forestry</div></div> | <div><div>237990 Other Heavy &amp; Civil Engineering Construction</div><div>Specialty Trade Contractors</div><div>238100 Foundation, Structure, &amp; Building Exterior Contractors (including framing carpentry, masonry, glass, roofing, &amp; siding)</div><div>238210 Electrical Contractors</div><div>238220 Plumbing, Heating, &amp; Air-Conditioning Contractors</div><div>238290 Other Building Equipment Contractors</div><div>238300 Building Finishing Contractors (including drywall, insulation, painting, wallcovering, flooring, tile, &amp; finish carpentry)</div><div>238900 Other Specialty Trade Contractors (including site preparation)</div></div> | <div><div>Printing and Related Support Activities</div><div>323100 Printing &amp; Related Support Activities</div><div>Petroleum and Coal Products Manufacturing</div><div>324110 Petroleum Refineries (including integrated)</div><div>324120 Asphalt Paving, Roofing, &amp; Saturated Materials Mfg</div><div>324190 Other Petroleum &amp; Coal Products Mfg</div><div>Chemical Manufacturing</div><div>325100 Basic Chemical Mfg</div><div>325200 Resin, Synthetic Rubber, &amp; Artificial &amp; Synthetic Fibers &amp; Filaments Mfg</div><div>325300 Pesticide, Fertilizer, &amp; Other Agricultural Chemical Mfg</div><div>325410 Pharmaceutical &amp; Medicine Mfg</div><div>325500 Paint, Coating, &amp; Adhesive Mfg</div><div>325600 Soap, Cleaning Compound, &amp; Toilet Preparation Mfg</div><div>325900 Other Chemical Product &amp; Preparation Mfg</div><div>Plastics and Rubber Products Manufacturing</div><div>326100 Plastics Product Mfg</div><div>326200 Rubber Product Mfg</div><div>Nonmetallic Mineral Product Manufacturing</div><div>327100 Clay Product &amp; Refractory Mfg</div><div>327210 Glass &amp; Glass Product Mfg</div><div>327300 Cement &amp; Concrete Product Mfg</div><div>327400 Lime &amp; Gypsum Product Mfg</div><div>327900 Other Nonmetallic Mineral Product Mfg</div><div>Primary Metal Manufacturing</div><div>331110 Iron &amp; Steel Mills &amp; Ferroalloy Mfg</div><div>331200 Steel Product Mfg from Purchased Steel</div><div>331310 Alumina &amp; Aluminum Production &amp; Processing</div><div>331400 Nonferrous Metal (except Aluminum) Production &amp; Processing</div><div>331500 Foundries</div><div>Fabricated Metal Product Manufacturing</div><div>332110 Forging &amp; Stamping</div><div>332210 Cutlery &amp; Handtool Mfg</div><div>332300 Architectural &amp; Structural Metals Mfg</div><div>332400 Boiler, Tank, &amp; Shipping Container Mfg</div><div>332510 Hardware Mfg</div><div>332610 Spring &amp; Wire Product Mfg</div><div>332700 Machine Shops; Turned Product; &amp; Screw, Nut, &amp; Bolt Mfg</div><div>332810 Coating, Engraving, Heat Treating, &amp; Allied Activities</div><div>332900 Other Fabricated Metal Product Mfg</div><div>Machinery Manufacturing</div><div>333100 Agriculture, Construction, &amp; Mining Machinery Mfg</div><div>333200 Industrial Machinery Mfg</div><div>333310 Commercial &amp; Service Industry Machinery Mfg</div><div>333410 Ventilation, Heating, Air-Conditioning, &amp; Commercial Refrigeration Equipment Mfg</div></div> | <div><div>333510 Metalworking Machinery Mfg</div><div>333610 Engine, Turbine &amp; Power Transmission Equipment Mfg</div><div>333900 Other General Purpose Machinery Mfg</div><div>Computer and Electronic Product Manufacturing</div><div>334110 Computer &amp; Peripheral Equipment Mfg</div><div>334200 Communications Equipment Mfg</div><div>334310 Audio &amp; Video Equipment Mfg</div><div>334410 Semiconductor &amp; Other Electronic Component Mfg</div><div>334500 Navigational, Measuring, Electromedical, &amp; Control Instruments Mfg</div><div>334610 Manufacturing &amp; Reproducing Magnetic &amp; Optical Media</div><div>Electrical Equipment, Appliance, and Component Manufacturing</div><div>335100 Electric Lighting Equipment Mfg</div><div>335200 Household Appliance Mfg</div><div>335310 Electrical Equipment Mfg</div><div>335900 Other Electrical Equipment &amp; Component Mfg</div><div>Transportation Equipment Manufacturing</div><div>336100 Motor Vehicle Mfg</div><div>336210 Motor Vehicle Body &amp; Trailer Mfg</div><div>336300 Motor Vehicle Parts Mfg</div><div>336410 Aerospace Product &amp; Parts Mfg</div><div>336510 Railroad Rolling Stock Mfg</div><div>336610 Ship &amp; Boat Building</div><div>336990 Other Transportation Equipment Mfg</div><div>Furniture and Related Product Manufacturing</div><div>337000 Furniture &amp; Related Product Manufacturing</div><div>Miscellaneous Manufacturing</div><div>339110 Medical Equipment &amp; Supplies Mfg</div><div>339900 Other Miscellaneous Manufacturing</div></div> |
| <div><div>Mining</div><div>211120 Crude Petroleum Extraction</div><div>211130 Natural Gas Extraction</div><div>212110 Coal Mining</div><div>212200 Metal Ore Mining</div><div>212310 Stone Mining &amp; Quarrying</div><div>212320 Sand, Gravel, Clay, &amp; Ceramic &amp; Refractory Minerals Mining &amp; Quarrying</div><div>212390 Other Nonmetallic Mineral Mining &amp; Quarrying</div><div>213110 Support Activities for Mining</div></div>  | <div><div>313000 Textile Mills</div><div>314000 Textile Product Mills</div><div>Apparel Manufacturing</div><div>315100 Apparel Knitting Mills</div><div>315210 Cut &amp; Sew Apparel Contractors</div><div>315250 Cut &amp; Sew Apparel Mfg (except Contractors)</div><div>315990 Apparel Accessories &amp; Other Apparel Mfg</div></div>   |   |   |
| <div><div>Utilities</div><div>221100 Electric Power Generation, Transmission &amp; Distribution</div><div>221210 Natural Gas Distribution</div><div>221300 Water, Sewage &amp; Other Systems</div><div>221500 Combination Gas &amp; Electric</div></div>  | <div><div>Leather and Allied Product Manufacturing</div><div>316110 Leather &amp; Hide Tanning &amp; Finishing</div><div>316210 Footwear Mfg (including rubber &amp; plastics)</div><div>316990 Other Leather &amp; Allied Product Mfg</div></div>  |   |   |
| <div><div>Construction</div><div>Construction of Buildings</div><div>236110 Residential Building Construction</div><div>236200 Nonresidential Building Construction</div><div>Heavy and Civil Engineering Construction</div><div>237100 Utility System Construction</div><div>237210 Land Subdivision</div><div>237310 Highway, Street, &amp; Bridge Construction</div></div>   | <div><div>Wood Product Manufacturing</div><div>321110 Sawmills &amp; Wood Preservation</div><div>321210 Veneer, Plywood, &amp; Engineered Wood Product Mfg</div><div>321900 Other Wood Product Mfg</div><div>Paper Manufacturing</div><div>322100 Pulp, Paper, &amp; Paperboard Mills</div><div>322200 Converted Paper Product Mfg</div></div>  |   |   |



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| <b>Merchant Wholesalers, Nondurable Goods</b><br>424100 Paper & Paper Products<br>424210 Drugs & Druggists' Sundries<br>424300 Apparel, Piece Goods, & Notions<br><br>424400 Grocery & Related Products<br>424500 Farm Product Raw Materials<br>424600 Chemical & Allied Products<br>424700 Petroleum & Petroleum Products<br><br>424800 Beer, Wine, & Distilled Alcoholic Beverages<br><br>424910 Farm Supplies<br>424920 Book, Periodical, & Newspapers<br><br>424930 Flower, Nursery Stock, & Florists' Supplies<br>424940 Tobacco Products & Electronic Cigarettes<br>424950 Paint, Varnish, & Supplies<br>424990 Other Miscellaneous Nondurable Goods<br><br><b>Wholesale Trade Agents and Brokers</b><br>425120 Wholesale Trade Agents & Brokers  | <b>Gasoline Stations &amp; Fuel Dealers</b><br>457100 Gasoline Stations (including convenience stores with gas)<br>457210 Fuel Dealers (including Heating Oil & Liquefied Petroleum)<br><br><b>Clothing and Accessories Retailers</b><br>458110 Clothing & Clothing Accessories Retailers<br>458210 Shoe Retailers<br>458310 Jewelry Retailers<br>458320 Luggage & Leather Goods Retailers<br><br><b>Sporting, Hobby, Book, Musical Instrument &amp; Miscellaneous Retailers</b><br>459110 Sporting Goods Retailers<br>459120 Hobby, Toy, & Game Retailers<br>459130 Sewing, Needlework, & Piece Goods Retailers<br>459140 Musical Instrument & Supplies Retailers<br>459210 Book Retailers & News Dealers (including newsstands)<br>459310 Florists<br>459410 Office Supplies & Stationery Retailers<br>459420 Gift, Novelty, & Souvenir Retailers<br>459510 Used Merchandise Retailers<br>459910 Pet & Pet Supplies Retailers<br>459920 Art Dealers<br>459930 Manufactured (Mobile) Home Dealers<br>459990 All Other Miscellaneous Retailers (including tobacco, candle, & trophy retailers)<br><br><b>Nonstore Retailers</b><br>various Nonstore retailers sell all types of merchandise using such methods as Internet, mail-order catalogs, interactive television, or direct sales. These types of Retailers should select the PBA associated with their primary line of products sold. For example, establishments primarily selling prescription and non-prescription drugs, select PBA code 456110 Pharmacies & Drug Retailers. | 488210 Support Activities for Rail Transportation<br>488300 Support Activities for Water Transportation<br>488410 Motor Vehicle Towing<br>488490 Other Support Activities for Road Transportation<br>488510 Freight Transportation Arrangement<br>488990 Other Support Activities for Transportation<br><br><b>Couriers and Messengers</b><br>492110 Couriers & Express Delivery Services<br>492210 Local Messengers & Local Delivery<br><br><b>Warehousing and Storage</b><br>493100 Warehousing & Storage (except lessors of mini-warehouses & self-storage units)   | <b>Securities, Commodity Contracts, and Other Financial Investments and Related Activities</b><br>523150 Investment Banking & Securities Intermediation<br><br>523160 Commodity Contracts Intermediation<br><br>523210 Securities & Commodity Exchanges<br><br>523900 Other Financial Investment Activities (including portfolio management & investment advice)<br><br><b>Insurance Carriers and Related Activities</b><br>524110 Direct Life, Health, & Medical Insurance Carriers<br>524120 Direct Insurance (except Life, Health & Medical) Carriers<br>524210 Insurance Agencies & Brokerages<br>524290 Other Insurance Related Activities (including third-party administration of insurance and pension funds)<br><br><b>Funds, Trusts, and Other Financial Vehicles</b><br>525100 Insurance & Employee Benefit Funds<br>525910 Open-End Investment Funds (Form 1120-RIC, U.S. Income Tax Return for Regulated Investment Companies)<br>525920 Trusts, Estates, & Agency Accounts<br>525990 Other Financial Vehicles (including mortgage REITs and closed-end investment funds)"Offices of Bank Holding Companies" and "Offices of Other Holding Companies" are located under <b>Management of Companies (Holding Companies)</b> below. |
|   |  |  |  |
| <b>Retail Trade</b><br><b>Motor Vehicle and Parts Dealers</b><br>441110 New Car Dealers<br>441120 Used Car Dealers<br>441210 Recreational Vehicle Dealers<br>441222 Boat Dealers<br>441227 Motorcycle, ATV, & All other Motor Vehicle Dealers<br>441300 Automotive Parts, Accessories, & Tire Retailers<br><br><b>Building Material and Garden Equipment and Supplies Dealers</b><br>444110 Home Centers<br>444120 Paint & Wallpaper Retailers<br>444140 Hardware Retailers<br>444180 Other Building Material Dealers<br>444200 Lawn & Garden Equipment & Supplies Retailers<br><br><b>Food and Beverage Retailers</b><br>445110 Supermarkets and Other Grocery Retailers (except Convenience)<br>445131 Convenience Retailers<br>445132 Vending Machine Operators<br>445230 Fruit & Vegetable Retailers<br>445240 Meat Retailers<br>445250 Fish & Seafood Retailers<br>445291 Baked Goods Retailers<br>445292 Confectionery & Nut Retailers<br>445298 All Other Specialty Food Retailers<br>445320 Beer, Wine, & Liquor Retailers<br><br><b>Furniture and Home Furnishings Retailers</b><br>449110 Furniture Retailers<br>449121 Floor Covering Retailers<br>449122 Window Treatment Retailers<br>449129 All Other Home Furnishings Retailers<br><br><b>Electronics and Appliance Retailers</b><br>449210 Electronic & Appliance Retailers (including computers)<br><br><b>General Merchandise Retailers</b><br>455110 Department Stores<br>455210 Warehouse Clubs, Supercenters, & Other General Merch. Retailers<br><br><b>Health and Personal Care Retailers</b><br>456110 Pharmacies & Drug Retailers<br>456120 Cosmetics, Beauty Supplies, & Perfume Retailers<br>456130 Optical Goods Retailers<br>456190 Other Health & Personal Care Retailers | <b>Transportation and Warehousing</b><br><b>Air, Rail, and Water Transportation</b><br>481000 Air Transportation<br>482110 Rail Transportation<br>483000 Water Transportation<br><b>Truck Transportation</b><br>484110 General Freight Trucking, Local<br>484120 General Freight Trucking, Long-distance<br>484200 Specialized Freight Trucking<br><b>Transit and Ground Passenger Transportation</b><br>485110 Urban Transit Systems<br>485210 Interurban & Rural Bus Transportation<br>485310 Taxi Service<br>485320 Limousine Service<br>485410 School & Employee Bus Transportation<br>485510 Charter Bus Industry<br>485990 Other Transit & Ground Passenger Transportation<br><br><b>Pipeline Transportation</b><br>486000 Pipeline Transportation<br><b>Scenic &amp; Sightseeing Transportation</b><br>487000 Scenic & Sightseeing Transportation<br><br><b>Support Activities for Transportation</b><br>488100 Support Activities for Air Transportation   | <b>Information</b><br><b>Motion Picture and Sound Recording Industries</b><br>512100 Motion Picture & Video Industries (except video rental)<br>512200 Sound Recording Industries<br><b>Publishing Industries</b><br>513110 Newspaper Publishers<br>513120 Periodical Publishers<br>513130 Book Publishers<br>513140 Directory & Mailing List Publishers<br>513190 Other Publishers<br>513210 Software Publishers<br><b>Broadcasting &amp; Content Providers &amp; Telecommunications</b><br>516100 Radio & Television Broadcasting Stations<br>516210 Media Streaming, Social Networks, & Other Content Providers<br>517000 Telecommunications (including Wired, Wireless, Satellite, Cable & Other Program Distribution, Resellers, Agents & Other Telecommunications, & Internet Service Providers)<br><br><b>Data Processing, Web Search Portals, &amp; Other Information Services</b><br>518210 Computing Infrastructure Providers, Data Processing, Web Hosting & Related Services<br>519200 Web Search Portals, Libraries, Archives, & Other Info. Services | <b>Real Estate and Rental and Leasing</b><br><b>Real Estate</b><br>531110 Lessors of Residential Buildings & Dwellings (including equity REITs)<br>531120 Lessors of Nonresidential Buildings (except Mini-warehouses) (including equity REITs)<br>531130 Lessors of Mini-warehouses & Self-Storage Units (including equity REITs)<br>531190 Lessors of Other Real Estate Property (including equity REITs)<br>531210 Offices of Real Estate Agents & Brokers<br>531310 Real Estate Property Managers<br>531320 Offices of Real Estate Appraisers<br>531390 Other Activities Related to Real Estate<br><br><b>Rental and Leasing Services</b><br>532100 Automotive Equipment Rental & Leasing<br>532210 Consumer Electronics & Appliances Rental<br>532281 Formal Wear & Costume Rental<br>532282 Video Tape & Disc Rental<br>532283 Home Health Equipment Rental<br>532284 Recreational Goods Rental<br>532289 All Other Consumer Goods Rental<br>532310 General Rental Centers<br>532400 Commercial & Industrial Machinery & Equipment Rental & Leasing  |





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