

Country-by-Country Report, Tax Year 2022



The Country-by-Country Report, Form 8975, is used by U.S. multinational enterprise (MNE) groups to report certain information on a country-by-country basis. MNE groups report this information on Form 8975 and its Schedule A, Tax Jurisdiction and Constituent Entity Information. The IRS Statistics of Income Division (SOI) produced sample-based annual aggregate statistics from Form 8975 and Form 8975, Schedule A, tax filings for ultimate parent entities that filed, U.S. Corporation Income Tax Return, Form 1120, or U.S. Return of Partnership Income, Form 1065, with accounting periods ending between July 2022 and June 2023.

Tax Jurisdiction Information by Major Geographic Region, Tax Year 2022

[Money amounts in thousands of dollars]

Major Geographic Region	Number of reporting MNE groups	Number of constituents	Total revenues	Profit before income tax	Accumulated earnings
Total	1,966	222,221	\$30,428,986,707	\$2,247,192,210	\$14,011,911,200
United States Operations	1,882	86,339	\$20,139,173,250	\$1,349,075,434	\$10,564,340,052
European Operations	1,605	57,740	\$4,524,664,295	\$276,304,744	\$1,522,776,711
Americas Operations	1,771	24,676	\$1,637,657,113	\$145,717,398	\$566,415,253
Asia & Oceania Operations	1,580	33,000	\$2,819,378,005	\$247,927,777	\$826,965,003
Africa Operations	641	3,845	\$96,312,211	\$15,945,028	\$15,153,485

NOTE: Details do not add to totals due to rounding, filing by multinational enterprise groups of information for more than one tax jurisdiction, and excluding stateless and other country tax jurisdiction data.

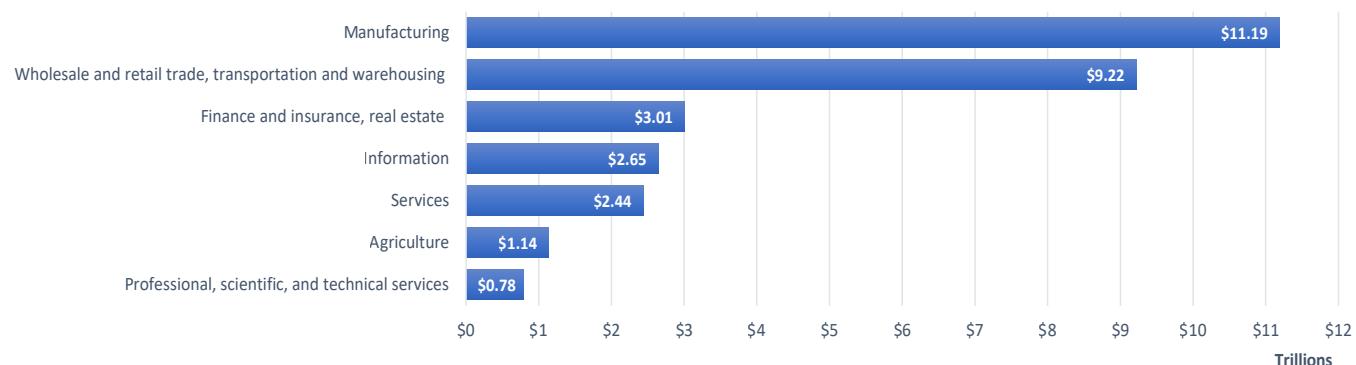
SOURCE: IRS, Statistics of Income Division, Country-by-Country Reports Study, Tax Year 2022, April 2025.

Highlights of the Data, Tax Year 2022

- For Tax Year 2022, there were 146 economies (tax jurisdictions) included in the data.
- During this year, U.S. MNE groups filed 1,966 Country-by-Country reports.
- A total of 222,221 constituent entities reported for the year.
- U.S. MNE groups reported \$30.4 trillion in total revenue; \$20.1 trillion of total revenue captured in the U.S., and \$9.1 trillion captured in foreign jurisdictions (Europe, Americas, Asia and Oceania, and Africa).
- A total of \$2.2 trillion was reported as profit before income tax; \$1.3 trillion was attributed to U.S. operations, while \$686 billion was earned in foreign jurisdictions.

- Approximately 80% (\$551 billion) of the U.S. MNE's total foreign profits before income tax was earned in 17 tax jurisdictions: Ireland, Singapore, Switzerland, Canada, China, Puerto Rico, Australia, Hong Kong, Germany, Mexico, Netherlands, Brazil, Japan, South Korea, France, India, and Malaysia.
- MNE groups reported \$2.9 trillion in total foreign accumulated earnings in Tax Year 2022.
- Manufacturing was the primary industry of U.S. MNE groups, accounting for 37% (\$11.2 trillion) of the total revenue of \$30.4 trillion. The wholesale and retail trade, transportation and warehousing industries were the second largest group of industries of U.S. MNEs, accounting for a combined 30% (\$9.2 trillion) of the total revenue.

Total Revenues of Multinational Enterprise Groups Designated by Major Industry Group, Tax Year 2022



SOURCE: IRS, Statistics of Income Division, Country-by-Country Reports Study, Tax Year 2022, April 2025.