Form 1120-F
Department of the Treasury Internal Revenue Service

U.S. Income Tax Return of a Foreign Corporation

OMB No. 1545-0123

For calendar year 2022, or tax year beginning ______, 2022, and ending ______, 20____, 20___, 20____, 20____, 20____, 20____, 20____, 20____, 20

Employer identification number

	Nan	ne				Employer	identification	number	
Type or	Nun	nber, street, and room or suite no. (see instru	ctions)			Check bo	ox(es) if: or address char		nitial return Final return
Prin	City	or town, state or province, country, and ZIP	or foreign postal code				ost-merger retu lule M-3 attache		Amended return Protective return
A C	Country	of incorporation	Ε	If the corpora	tion had	an agent i	n the United	States at	any time during
		country under whose laws the income		the tax year, e	enter:				
is	also si	ubject to tax		(1) Type of ag	gent				
C D	ate inc	orporated		(2) Name					
	I) Locat	tion of corporation's primary books and ate, and country)	records (city, province	(3) Address					
			E				e corporatior		
(2	2) Princ	ipal location of worldwide business		(1) Business a	activity c	ode numbe	er		
		·		(2) Business a	activity				
				(3) Product or	r service				
(3		corporation maintains an office or place		Check metho	d of acc	ounting:	(1) 🗌 Cash	(2)	Accrual
•	Unite	d States, check here		(3) 🗌 Other (specify)				
		Co	mputation of Tax Du	e or Overpa	ayment	t			
1	Tax fro	om Section I, line 11, page 3			1				
2	Tax fro	om Section II, Schedule J, line 9, page 5			2				
3	Tax fro	om Section III (add lines 6 and 10 on pag	ge 6)		3				
4	Total t	tax. Add lines 1 through 3					4	4	
5a	2021 c	overpayment credited to 2022	5a						
b	2022 e	estimated tax payments	5b						
с	Less 2	022 refund applied for on Form 4466 .	5c ()				
d	Combi	ne lines 5a through 5c			5d				
е	Tax de	posited with Form 7004			5e				
f	Credit	for tax paid on undistributed capital gai	ns (attach Form 2439) .		5f				
g		for federal tax paid on fuels (attach For	,		5g				
h	Reserv	ved for future use			5h				
i	Forms	acome tax paid or withheld at source (8288-A and 8805 (attach Forms 8288-/	A and 8805))		5i				
j	•	oayments. Add lines 5d through 5i						5j	
6		ted tax penalty (see instructions). Chec						-	
7		nt owed. If line 5j is smaller than the to						7	
8a	Overp	ayment. If line 5j is larger than the tota	I of lines 4 and 6, enter amo	ount overpaid			8	<u>a</u>	
b		nt of overpayment on line 8a resultin ule W, line 7, page 8)	g from tax deducted and		-			b	
9		portion of line 8a you want Credited to						9	
Sig	007	der penalties of perjury, I declare that I have exar rect, and complete. Declaration of preparer (other t					-	<u> </u>	and belief, it is true
Her	e _							with the prep (see instruction	parer shown below ions)?
	Sig	nature of officer	Date Tit	le					
Paid	b	Print/Type preparer's name	Preparer's signature		Da	te		if PTI	Ν
	parer	•				I	self-emp	oyed	
	Only	Firm's name				F	irm's EIN		
		Firm's address				P	hone no.	<u> </u>	1100 5
For P	aperw	ork Reduction Act Notice, see separa	te instructions.	Ca	at. No. 114	4701		Form	n 1120-F (2022

For	m 1120-F (2022)					F	Page 2
Ac	Iditional Information (continued from page 1)		v	At the end of the tax year, did any individual, partnership,	Yes	No
н	Did the corporation's method of accounting change from the preceding tax year?	Yes	No		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.)		
I	Did the corporation's method of determining income change from the preceding tax year? If "Yes," attach a statement with an explanation.				If "Yes," attach a statement showing the name and identifying number. (Do not include any information already entered in item T .) Enter percentage owned		
J	Did the corporation file a U.S. income tax return for the preceding tax year?			w	(1) Is the corporation taking a position on this return that a U.S. tax treaty overrules or modifies an Internal Revenue law		
к	(1) At any time during the tax year, was the corporation engaged in a trade or business in the United States?				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: <i>Failure to disclose a treaty-based return position may</i>		
	(2) If "Yes," is taxpayer's trade or business within the United States solely the result of a section 897 (FIRPTA) sale or disposition?				 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? 		
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," attach a copy of the Competent Authority determination letter or Advance Pricing Agreement to your return.		
	If "Yes," enter the name of the foreign country:			x	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?		
м	Did the corporation have any transactions with related parties?				If "Yes," attach a statement listing the name, country under whose		
	If "Yes," Form 5472 may have to be filed (see instructions). Enter number of Forms 5472 attached			Y	laws the entity was organized, and EIN (if any) of each such entity.(1) Did a partnership allocate to the corporation a distributive share of income from a directly owned		
Ν	Is the corporation a controlled foreign corporation? (See section 957(a) for definition.)				partnership interest, any of which is ECI or treated as ECI by the partnership or the partner?		
0	Is the corporation a personal service corporation? (See instructions for definition.)				If "Yes," attach Schedule P. See instructions. (2) During the tax year, did the corporation own, directly or		
Ρ	Enter tax-exempt interest received or accrued during the tax year (see instructions) \$				indirectly, at least a 10% interest, in any foreign partnership? If "Yes," see instructions for required attachment.		
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			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?		
	attribution.)				(2) Has the corporation recognized any interbranch amounts? If "Yes," attach statement (see instructions)		
	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.			A	A Is the corporation required to file Schedule UTP (Form 1120), Uncertain Tax Position Statement (see instructions)? If "Yes," complete and attach Schedule UTP.		
R	If the corporation has an NOL for the tax year and is electing to forego the carryback period, check here (see instructions)			BE	3 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? .		
S	Enter the available NOL carryover from prior tax years. (Do not reduce it by any deduction on line 30a, page 4.) \$			co	C Is the corporation (including the home office or any branch) a qualified derivatives dealer (QDD)?		
т	4.) \$ Is the corporation a subsidiary in a parent-subsidiary controlled group?				(2) If "Yes," enter the QI-EIN		
	If "Yes," enter the parent corporation's: (1) EIN			זס	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))?		
	(2) Name				If "Yes," complete and attach Form 8991.		
U	(1) Is the corporation a dealer under section 475?.(2) Did the corporation mark to market any securities				E 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)?		
_	or commodities other than in a dealer capacity?				If "Yes," enter the total amount of the disallowed deductions \$		

Additional Information (continued from page 2	2)		HH During the tax year, did the corporation dispose of an	Yes	No
FF Did the corporation have an election under section 163(j) for any real property trade or business or any farming business in effect during the tax year (see instructions)?	Yes	No	 interest in a partnership that directly or indirectly engaged in a trade or business within the United States? II Is the corporation attaching Form 8996 to certify as a Qualified Opportunity Fund? 		
 GG Does the corporation satisfy one or more of the following (see instructions)? (1) The corporation owns a pass-through entity with current, or prior year carryover, excess business interest expense. 			If "Yes," enter amount from Form 8996, line 15 \$		
(2) The corporation's aggregate average annual gross receipts (determined under section 448(c)) for the 3 tax years preceding the current tax year are more than \$27 million and the corporation has business interest expense.					
(3) The corporation is a tax shelter and the corporation has business interest expense.If "Yes," to any, complete and attach Form 8990.					

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 items 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 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.

Name of treaty country, if any

	5, 5,				
	(a) Class of income (see instructions)	(b) Gross amount	(c) Rate of tax (%)	(d) Amount of tax liability	(e) Amount of U.S. income tax paid or withheld at the source
1	Interest				
2a	Dividends (excluding payments received by QDDs in their equity derivatives dealer capacity)				
2b	Dividend equivalents (excluding payments received by QDDs in their equity derivatives dealer capacity)				
3	Rents				
4	Royalties				
5	Annuities				
6	Gains from disposal of timber, coal, or domestic iron ore with a retained economic interest (attach supporting statement)				
7	Gains from sale or exchange of patents, copyrights, etc.				
8	Fiduciary distributions (attach supporting statement)				
9	Gross transportation income (see instructions)		4		
10	Other items of income				
11	Total. Enter here and on line 1, page 1				
12	Total. Enter here and include on line 5i, page 1			· · · · · · · · ·	
13	Is the corporation fiscally transparent under listed above?	the laws of the foreign ju	risdiction with res	pect to any item of incor	. 🗌 Yes 🗌 No

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

Important:	Fill in all applicable lines and schedules.	. If you need more space, see	e Assembling the Return in the instructions.
		· · · · · · · · · · · · · · · · · · ·	

1a	Gross receipts or sales b Less returns and allowances c Bal	1c
2	Cost of goods sold (attach Form 1125-A)	2
3	Gross profit (subtract line 2 from line 1c)	3
4	Dividends (Schedule C, line 13)	4
5	Interest	5
6	Gross rents	6
7	Gross royalties	7
8	Capital gain net income (attach Schedule D (Form 1120))	8
9	Net gain or (loss) from Form 4797, Part II, line 17 (attach Form 4797)	9
10	Other income (see instructions-attach statement)	10
11	Total income. Add lines 3 through 10 . .	11
12	Compensation of officers (see instructions – attach Form 1125-E)	12
13	Salaries and wages (less employment credits)	13
14	Repairs and maintenance	14
15	Bad debts (for bad debts over \$500,000, attach a list of debtors and amounts)	15
16	Rents	16
17	Taxes and licenses	17
18	Interest expense from Schedule I, line 25 (see instructions)	18
19	Charitable contributions	19
20	Depreciation from Form 4562 not claimed on Form 1125-A or elsewhere on return (attach Form 4562) .	20
21	Depletion	21
22	Advertising	22
23	Pension, profit-sharing, etc., plans	23
24	Employee benefit programs	24
25	Reserved for future use	25
26	Deductions allocated and apportioned to ECI from Schedule H, line 20 (see instructions)	26
27	Other deductions (attach statement)	27
28	Total deductions. Add lines 12 through 27	28
29	Taxable income before NOL deduction and special deductions (subtract line 28 from line 11)	29
30	Less: a Net operating loss deduction (see instructions)	
	b Special deductions (Schedule C, line 14)	
	c Add lines 30a and 30b	30c
31	Taxable income or (loss). Subtract line 30c from line 29	31

Sch	edule C Dividends and Special Deductions (see instructions)			
		(a) Dividends	(b) %	(c) Special deductions (a) × (b)
1	Dividends from less-than-20%-owned domestic corporations (other than debt-financed stock)		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)		see instructions	
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	
8	Subtotal. Add lines 1 through 7. See instructions for limitation		see instructions	
9	Dividends from foreign corporations not included on line 3, 6, or 7			
10	IC-DISC and former DISC dividends not included on line 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 column (a), lines 8 through 11. Enter here and on line 4, page 4			
14	Total special deductions. Add column (c), lines 8 and 12. Enter here and on line 3	30b, page 4		
Sch	edule J Tax Computation (see instructions)			
1	Check if the corporation is a member of a controlled group (attach Schedule O (Fo	orm 1120))....	. 🗆 📗	
2	Income tax			2
3	Base erosion minimum tax amount (attach Form 8991)			3
4	Add lines 2 and 3			4
5a	Foreign tax credit (attach Form 1118)			
b	General business credit (attach Form 3800)	. 5b		
с	Credit for prior year minimum tax (attach Form 8827)	. 5c		
d	Bond credits from Form 8912	. 5d		
6	Total credits. Add lines 5a through 5d			6
7	Subtract line 6 from line 4			7
8	Other taxes. Check if from: Form 4255 Form 8611	orm 8697		
	Form 8866 Form 8902 O	ther (attach statement)		8
	Total tax. Add lines 7 and 8. Enter here and on line 2, page 1			9

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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	1			
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.)	2	L		
3 Effectively connected earnings and profits. Combine line 1 and line 2	3			
4a Enter U.S. net equity at the end of the current tax year. (Attach required statement.)	4a			
b Enter U.S. net equity at the end of the prior tax year. (Attach required statement.)	4b			
c Increase in U.S. net equity. If line 4a is greater than or equal to line 4b, subtract line 4b from line 4a. Enter the result here and skip to line 4e	4c			
d Decrease in U.S. net equity. If line 4b is greater than line 4a, subtract line 4a from line 4b	4d			
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	4e			
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 4d or line 4e to line 3 and enter the total here	5			
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	6			
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	7a			
b Enter the inverse of the total amount deferred, capitalized, and disallowed from Schedule I, line 24g (i.e., if line 24g is negative, enter as a positive number; if line 24g is positive, enter as a negative number)	7b			
c Combine lines 7a and 7b (amount must equal Schedule I, line 23)	7c			
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	8			
9a Excess interest. Subtract line 8 from line 7c. If zero or less, enter -0	9a			
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	9b			
c Subtract line 9b from line 9a	9c			
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 W on page 2	10			
Part III-Additional Information				
11 Is the corporation claiming a reduction in, or exemption from, the branch profits tax due to:			Yes	No
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 **11b** 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).

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	if completing on U.S. basis of	or 🔄 Worldwide ba	sis		
Schedule L	Balance Sheets per Books				
		Beginning o	-	End of	tax year
	Assets	(a)	(b)	(c)	(d)
Cash .					
a Trade note	es and accounts receivable				
b Less allow	vance for bad debts ()		()
Inventorie	s				
U.S. gove	rnment obligations				
5 Tax-exem	pt securities (see instructions)				
a Interbranc	ch current assets*				
b Other curr	rent non-U.S. assets*				
c Other curr	rent U.S. assets*				
Loans to s	shareholders				
Mortgage	and real estate loans				
	ans and investments-non-U.S.				
b Other loar	ns and investments—U.S. assets* .				
Da Buildings	and other depreciable assets				
-	imulated depreciation ()		()
a Depletable	e assets				
b Less accu	Imulated depletion)		()
	of any amortization)				
	assets (amortizable only)				
-	imulated amortization)		()
Assets he	ld in trust				
Other non	-current interbranch assets*				
a Other non	-current non-U.S. assets*				
b Other non	-current U.S. assets*				
7 Total asse	ets				
-	Liabilities				
Accounts	payable				
	s, notes, bonds payable in less than				
1 year:	h liabilities*				
					-
	rent liabilities*				
	m shareholders				
00	s, notes, bonds payable in 1 year or				
more:	1. 1. 1. 1. 1. 1. 1				
•	y liabilities*				
	held in trust				
	rbranch liabilities*				
b Other third	d-party liabilities*				
	Equity				
Capital sto	ock: a Preferred stock				
	b Common stock				
	paid-in capital				
	earnings-Appropriated*				
	earnings-Unappropriated				
	nts to shareholders' equity*				(
Less cost	of treasury stock)	(

*Attach statement-see instructions.

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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 5i	1
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	4
5 Tentative overpayment resulting from tax deducted and withheld under Chapters 3 and 4.	
Subtract line 4 from line 1	5
6 Enter the amount from page 1, line 8a	6
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	7