Form	1	12	20-	F
1 Unit		_		
Depar	tmen	t of the	Treasu	ry

Internal Revenue Service

U.S. Income Tax Return of a Foreign Corporation

OMB No. 1545-0123 2018

U.3. Income tax rectaint of a second secon

	INan	ne					Em	ipioyer iden	iffication nu	mber	
Type or Prin	Nun	nber, street, and room or suite no. (see instructions)					Cł	neck box(es] Name or ad) if: dress change	Initial return	
FIIII	City	or town, state or province, country, and ZIP or foreign postal code] First post-m] Schedule M	-	Amended retu	
A C	ountry	of incorporation	E	If the	corpor	ation had	an a	agent in the	United St	ates at any time d	uring
		country under whose laws the income reported on this return			ax year,			0		,	
	-	ubject to tax		(1) Ty	pe of a	gent					
c D	ate inco	orporated		(2) Na	ame						
) Locat or sta	tion of corporation's primary books and records (city, province ate, and country)		(3) Ao	ddress						
			F					nter the co			
Ċ		ipal location of worldwide business	Ľ								
-,				(2) B	usiness	activity •					
				(3) Pr	roduct (or service	▶				
		corporation maintains an office or place of business in the	6	Chec	k meth	od of acc	 ounti	ing: (1)	 □ Cash	(2) 🗌 Accrual	
(-	d States, check here.	ľ		_	(specify) I					
	Onite	Computation of Tax	Du								
1	Tax fro	om Section I, line 11, page 3					-				
2		om Section II, Schedule J, line 9, page 5									
3		om Section III (add lines 6 and 10 on page 6)									
4		tax. Add lines 1 through 3							4		
- 5a		overpayment credited to 2018 5a	•	İ			•		-		
b		estimated tax payments			-						
c		018 refund applied for on Form 4466 . 5c (5						
d		ine lines 5a through 5c			, 5d						
e		eposited with Form 7004.			50 5e				-		
f		for tax paid on undistributed capital gains (attach Form 2439).			56 5f						
g		for federal tax paid on fuels (attach Form 4136). See instruction			5g				-		
9 h		dable credit from Form 8827, line 8c			5h						
i		addre creat income of the source (add line 12, page 3, and							-		
•		orms 8288-A and 8805 (attach Forms 8288-A and 8805)) .			5i						
j		payments. Add lines 5d through 5i							5j		
ј 6		ated tax penalty (see instructions). Check if Form 2220 is attache							6		
7		nt owed. If line 5j is smaller than the total of lines 4 and 6, enter							7		
8a		ayment. If line 5j is larger than the total of lines 4 and 6, enter a							8a		
b	-	nt of overpayment on line 8a resulting from tax deducted									
b		Schedule W, line 7, page 8)		with			ner s		8b		
9	•	portion of line 8a you want Credited to 2019 estimated tax	•			1	Re	funded ►	9		
•	Unc	der penalties of perjury, I declare that I have examined this return, including acc					nents,	, and to the b	-	owledge and belief, it i	s true
Sig	n ^{corr}	rect, and complete. Declaration of preparer (other than taxpayer) is based on all in	form	ation of v	which pre	parer has ar	ny kno	wledge.	Ma	y the IRS discuss this re	turn
Her			k						wit	the preparer shown be instructions)?	low
	~)	Signature of officer Date		Title							
	J	Print/Type preparer's name Preparer's signature				Da	te			PTIN	
Paio									Check		
	parer	Firm's name						Firm's	EIN ►		
Use	Only	Firm's address						Phone			
For P	aperw	ork Reduction Act Notice, see separate instructions.				Cat. No. 11	14701			Form 1120-F	(2018

For	m 1120-F (2018)					F	Page 2
Ac	ditional 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		
	If "Yes," attach a statement with an explanation.				(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 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?		
IVI	Did the corporation have any transactions with related parties?				If "Yes," attach a statement listing the name, country under whose laws the entity was organized, and EIN (if any) of each such entity.		
	If "Yes," Form 5472 may have to be filed (see instructions).			Y	(1) Did a partnership allocate to the corporation a		
N	Enter number of Forms 5472 attached ► Is the corporation a controlled foreign corporation? (See section 957(a) for definition.)				distributive share of income from a directly owned 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 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	B 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 $(4) > 5$			co	C Is the corporation (including the home office or any branch) a qualified derivatives dealer (QDD)?		
т	4.) ► \$				(2) If "Yes," enter the QI-EIN ►		
	controlled group?			DD	Does the corporation have gross receipts of at least \$500 million in any of the 3 preceding tax years (see sections 59.4(a)(2) and (3))2		
	(1) EIN ► (2) Name ►				59A(e)(2) and (3))?		
U	(1) Is the corporation a dealer under section 475?			LEE	E During the tax year, did the corporation pay or accrue any interest or royalty for which a deduction is not allowed under section 2674 (see instructions)?		
	(2) Did the corporation mark to market any securities or commodities other than in a dealer capacity?				under section 267A (see instructions)?		

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A	dditional Information (continued from page 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? 		
GC	 a Does the corporation satisfy one of the following conditions and the corporation does not own a pass-through entity with current year, or prior year carryover, excess business interest expense (see instructions)? (1) The corporation's aggregate average annual gross 			If "Yes," enter amount from Form 8996, line 13 ▶ \$		
	receipts (determined under section 448(c)) for the 3 tax years preceding the current tax year do not exceed \$25 million, and the corporation is not a tax shelter, or (2) The corporation only has business interest expense from (a) an electing real property trade or business, (b) an					
	electing farming business, or (c) certain utility businesses under section 163(j)(7). If "No," 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

	(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)				
10	Other items of income				
11 12	Total. Enter here and on line 1, page 1.			· · · · · · · •	
13	Is the corporation fiscally transparent under listed above? If "Yes," attach a statement that provides the i	0,			🗌 Yes 🗌 No

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

Im	portant: Fill in all applicable	e lines and sche	dule	es. If you need more space,	see Assembli	ng t	he Return	in the	e instructions.
	1a Gross receipts or sales			b Loss returns and allowances			o Rol 🕨	10	

	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
ne	5	Interest	5
ncome	6	Gross rents	6
Ĕ	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
ons	13	Salaries and wages (less employment credits)	13
lcti	14	Repairs and maintenance	14
edt	15	Bad debts (for bad debts over \$500,000, attach a list of debtors and amounts)	15
Ď	16	Rents	16
ō	17	Taxes and licenses	17
ü	18	Interest expense from Schedule I, line 25 (see instructions)	18
tati	19	Charitable contributions	19
Ē	20	Depreciation from Form 4562 not claimed on Form 1125-A or elsewhere on return (attach Form 4562) .	20
or	21	Depletion	21
s f	22	Advertising	22
tior	23	Pension, profit-sharing, etc., plans	23
DD	24	Employee benefit programs	24
(See instructions for limitations on deductions.)	25	Reserved for future use	25
ĕ	26	Deductions allocated and apportioned to ECI from Schedule H, line 20 (see instructions)	26
	27	Other deductions (attach statement)	27
ns	28	Total deductions. Add lines 12 through 27	28
itio	29	Taxable income before NOL deduction and special deductions (subtract line 28 from line 11)	29
Deductions	30	Less: a Net operating loss deduction (see instructions)	
)ec		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 Eorm 1120-F (2018)

Sche	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)			
2	Dividends from 20%-or-more-owned domestic corporations (other than debt-financed stock)			
3	Dividends on certain debt-financed stock of domestic and foreign corporations (section 246A)			
4	Dividends on certain preferred stock of less-than-20%-owned public utilities			
5	Dividends on certain preferred stock of 20%-or-more-owned public utilities .			
6	Dividends from less-than-20%-owned foreign corporations			
7	Dividends from 20%-or-more-owned foreign corporations			
8	Subtotal. Add lines 1 through 7. See instructions for limitation			
9	Dividends from foreign corporations not included on line 3, 6, or 7			
0	IC-DISC and former DISC dividends not included on line 1, 2, or 3 (section 246(d))			
1	Other dividends			
2	Deduction for dividends paid on certain preferred stock of public utilities .			
3	Total dividends. Add lines 8 through 11. Enter here and on line 4, page 4 .			
4	Total special deductions. Add lines 8 and 12. Enter here and on line 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	rm 1120)) 🕨 🗌		
2	Income tax		2	
3	Base erosion minimum tax (attach Form 8991)		3	
4	Add lines 2 and 3		4	
5a	Foreign tax credit (attach Form 1118)	a		
b	General business credit (attach Form 3800)	D		
С	Credit for prior year minimum tax (attach Form 8827)			
d	Bond credits from Form 8912	k		
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 Ot	ther (attach statement) .	8	
9	Total tax. Add lines 7 and 8. Enter here and on line 2, page 1		9	

SEC	TION III – Branch Profits Tax and Tax on Excess Interest				
Par	t 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			
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			
c	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			
Par	t II-Tax on Excess Interest (see instructions for this Part and for Schedule I (Form 1120-	=))			
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 24d (i.e., if line 24d is negative, enter as a positive number; if line 24d 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			
	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			
Par	III—Additional Information				
				Yes	No
11	Is the corporation claiming a reduction in, or exemption from, the branch profits tax due to:				
а	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 s by Temporary Regulations section 1.884-2T(d)(5).	statem	ent required		

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te: Check if completing on ► U.S. basis or	Worldwide basi	S			
Chedule L Balance Sheets per Books					
	Beginning of	tax year	End of tax year		
Assets	(a)	(b)	(c)	(d)	
Cash					
a Trade notes and accounts receivable					
b Less allowance for bad debts)		()		
U.S. government obligations					
Tax-exempt securities (see instructions)					
a Interbranch current assets*					
Other current non-U.S. assets*					
c Other current U.S. assets*					
Loans to shareholders					
Mortgage and real estate loans					
a Other loans and investments-non-U.S.					
assets*					
b Other loans and investments–U.S. assets* .					
a Buildings and other depreciable assets					
b Less accumulated depreciation ()		()		
a Depletable assets					
b Less accumulated depletion ()		()		
Land (net of any amortization)					
a Intangible assets (amortizable only)					
Less accumulated amortization ()		()		
Assets held in trust					
Other non-current interbranch assets*					
a Other non-current non-U.S. assets*					
b Other non-current U.S. assets*					
Total assets					
Accounts payable					
Mortgages, notes, bonds payable in less than 1 year:					
a Interbranch liabilities*					
b Third-party liabilities*					
Other current liabilities*					
Loans from shareholders					
Mortgages, notes, bonds payable in 1 year or					
more:					
a Interbranch liabilities*					
b Third-party liabilities*					
Liabilities held in trust					
a Other interbranch liabilities*					
Equity					
Capital stock: a Preferred stock					
Additional paid-in capital					
Retained earnings—Appropriated					
Adjustments to shareholders' equity*					
Less cost of treasury stock				(
Total liabilities and shareholders' equity			,	۱	

*Attach statement-see instructions.

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Schedule W Overpayment Resulting From Tax Deducted and Withheld Under Chapters	s 3 ar	nd 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	