Form 88	58 (Rev. 9-2021)		Page
Scho	edule G Other Information (continued)	I I	
_	1 d EDE ED 16 d 2 d 200 ()	Yes	No
6	Is the FDE or FB a qualified business unit as defined in section 989(a)?		
	Do not complete lines 7 and 8 if you are an individual who owns an FB or FDE directly or through tiers of		
	FBs and FDEs.		
7a	During the tax year, did the FDE or FB receive, or accrue the receipt of, any amounts defined as a		
7 4	base erosion payment under section 59A(d) or have a base erosion tax benefit under section 59A(c)(2) from		
	a foreign person which is a related party of the taxpayer? See instructions. If "Yes," complete lines 7b		
	and 7c		
b	Enter the total amount of the base erosion payments \$		
C	Enter the total amount of the base erosion tax benefit \$		
8a	During the tax year, did the FDE or FB pay, or accrue the payment of, any amounts defined as a base		
	erosion payment under section 59A(d) or have a base erosion tax benefit under section 59A(c)(2) to a foreign		
	person, which is a related party of the taxpayer? See instructions. If "Yes," complete lines 8b and 8c		
b	Enter the total amount of the base erosion payments \$		
С	Enter the total amount of the base erosion tax benefit \$		
9	Answer only if the tax owner of the FDE or FB is a CFC: Were there any intracompany transactions between		
	the FDE or FB and the CFC or any other branch of the CFC during the tax year, in which the FDE or FB		
	acted as a manufacturing, selling, or purchasing branch?		
	Answer the remaining questions in Schedule G only if the tax owner of the FB or the interest in the FDE is a		
	U.S. corporation. Answer questions 10a through 11c if the tax owner of the FB or the interest in the FDE is		
40.	treated as a U.S. corporation solely for purposes of these questions.		
1 0 a	If the FB or the interest in the FDE is a separate unit under Regulations section 1.1503(d)-1(b)(4), and is not		
	part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii), does the separate unit have a dual consolidated loss as defined in Regulations section 1.1503(d)-1(b)(5)(ii)?		
h	a dual consolidated loss as defined in Regulations section 1.1503(d)-1(b)(5)(ii)?		
	If the FB or the interest in the FDE is a separate unit and part of a combined separate unit under		
iiu	Regulations section 1.1503(d)-1(b)(4)(ii), does the combined separate unit have a dual consolidated loss as		
	defined in Regulations section 1.1503(d)-1(b)(5)(ii)? If "Yes," complete lines 11b and 11c		
b	Enter the amount of the dual consolidated loss for the combined separate unit ▶ \$ (
	Enter the net income (loss) attributed to the individual FB or the individual interest in the FDE as determined		
	under Regulations section 1.1503(d)-5(c)(4)(ii)(A)		
12a	Was any portion of the dual consolidated loss in line 10b or 11b taken into account in computing U.S.		
	taxable income for the year? If "Yes," go to line 12b. If "No," go to line 13		
b	Was this a permitted domestic use of the dual consolidated loss under Regulations section 1.1503(d)-6? If		
	"Yes," see the instructions and go to line 12c. If "No," go to line 12d		
С	If "Yes," is the documentation that is required for the permitted domestic use under Regulations section		
	1.1503(d)-6 attached to the return? After answering this question, go to line 13a		
d	If this was not a permitted domestic use, was the dual consolidated loss used to compute consolidated		
	taxable income as provided under Regulations section 1.1503(d)-4? If "Yes," go to line 12e		
е	Enter the separate unit's contribution to the cumulative consolidated taxable income		
120	("cumulative register") as of the beginning of the tax year ▶ \$ See instructions. During the tax year, did any triggering event(s) occur under Regulations section 1.1503(d)-6(e) requiring		
13a	recapture of any dual consolidated loss(es) attributable to the FB or interest in the FDE, individually or as		
	part of a combined separate unit, in any prior tax years?		
b	If "Yes," enter the total amount of recapture ▶ \$ See instructions.		
	edule H Current Earnings and Profits or Taxable Income (see instructions)		
	rtant: Enter the amounts on lines 1 through 6 in functional currency.		
1	Current year net income (loss) per foreign books of account		
2	Total net additions		
3	Total net subtractions		
4	Current earnings and profits (or taxable income-see instructions) (line 1 plus line 2 minus line 3) 4		
5	DASTM gain (loss) (if applicable) 5		
6	Combine lines 4 and 5		
7	Current earnings and profits (or taxable income) in U.S. dollars (line 6 translated at the average		
_	exchange rate determined under section 989(b) and the related regulations (see instructions))		
8	Enter exchange rate used for line 7		