

Worksheet A - continued

Form 5471

(Keep for your records)

2021

Name(s) as shown on return

Tax ID Number

Name of foreign corporation

EIN (if any)

Reference ID number (see instructions)

Worksheet A (continued) (See instructions.)

16 Adjusted net full inclusion foreign base company income:			
a	Enter the excess, if any, of line 11 over line 7	16a	
b	Expenses allocated and apportioned under section 954(b)(5)	16b	
c	Net full inclusion foreign base company income. Subtract line 16b from line 16a	16c	
d	Net full inclusion foreign base company income excluded under high-tax exception	16d	
e	Subtract line 16d from line 16c		16e
17	Adjusted net foreign base company income. Add lines 13h, 14e, 15e, and 16e.		17
18 Adjusted net insurance income (other than related person insurance income):			
a	Enter amount from line 6 (other than related person insurance income)	18a	
b	Expenses allocated and apportioned to the amount on line 18a under section 953	18b	
c	Net insurance income. Subtract line 18b from line 18a	18c	
d	Net insurance income excluded under high-tax exception	18d	
e	Subtract line 18d from line 18c		18e
19 Adjusted net related person insurance income:			
a	Enter amount from line 6 that is related person insurance income	19a	
b	Expenses allocated and apportioned to the amount on line 19a under section 953	19b	
c	Net related person insurance income. Subtract line 19b from line 19a	19c	
d	Net related person insurance income excluded under high-tax exception	19d	
e	Subtract line 19d from line 19c		19e
20	International boycott income (section 952(a)(3))		20
21	Illegal bribes, kickbacks, and other payments (section 952(a)(4))		21
22	Income described in section 952(a)(5) (see instructions)		22
23	Subpart F income before application of sections 952(b) and (c) and section 959(b). Add lines 17, 18e, 19e, and 20 through 22		23
24	Enter the portion of line 13h that is U.S. source income effectively connected with a U.S. trade or business (section 952(b))	24	
25	Exclusions under section 959(b) that apply to line 13h amount	25	
26	Section 954(c) subpart F Foreign Personal Holding Company Income. Subtract the sum of lines 24 and 25 from line 13h		26
27	Enter the portion of line 14e that is U.S. source income effectively connected with a U.S. trade or business (section 952(b))	27	
28	Exclusions under section 959(b) that apply to line 14e amount	28	
29	Section 954(d) subpart F Foreign Base Company Sales Income. Subtract the sum of lines 27 and 28 from line 14e		29
30	Enter the portion of line 15e that is U.S. source income effectively connected with a U.S. trade or business (section 952(b))	30	
31	Exclusions under section 959(b) that apply to line 15e amount	31	
32	Section 954(e) subpart F Foreign Base Company Services Income. Subtract the sum of lines 30 and 31 from line 15e		32
33	Enter the sum of the portion of lines 16e, 18e, 19e, 20, 21, and 22 that is U.S. source income effectively connected with a U.S. trade or business (section 952(b))	33	
34	Exclusions under section 959(b) that apply to line 16e, 18e, 19e, 20, 21, and 22 amounts	34	
35	Other subpart F income. Subtract the sum of lines 33 and 34 from the sum of lines 16e, 18e, 19e, 20, 21, and 22		35
36	Total subpart F income. Add lines 26, 29, 32, and 35		36
37 Current E&P limitation computation:			
a	Current E&P	37a	
b	Tested loss (enter as a positive number – see instructions)	37b	
c	Total of line 37a and line 37b	37c	
38	Enter the smaller of line 36 or line 37c		38