

Worksheet B

Form 5471

(Keep for your records)

2021

Name(s) as shown on return

Tax ID Number

U.S. Shareholder's Pro Rata Share of Earnings of a CFC Invested in U.S. Property

Enter the amounts on lines 1 through 18 in functional currency.

<p>1 Amount of U.S. property (as defined in sections 956(c) and (d)) held (directly or indirectly) by the CFC as of the close of:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%;">a</td> <td style="width: 65%;">The first quarter of the tax year</td> <td style="width: 10%; border: 1px solid black; text-align: center;">1a</td> <td style="width: 20%;"></td> </tr> <tr> <td>b</td> <td>The second quarter of the tax year</td> <td style="border: 1px solid black; text-align: center;">1b</td> <td></td> </tr> <tr> <td>c</td> <td>The third quarter of the tax year</td> <td style="border: 1px solid black; text-align: center;">1c</td> <td></td> </tr> <tr> <td>d</td> <td>The fourth quarter of the tax year</td> <td style="border: 1px solid black; text-align: center;">1d</td> <td></td> </tr> </table>	a	The first quarter of the tax year	1a		b	The second quarter of the tax year	1b		c	The third quarter of the tax year	1c		d	The fourth quarter of the tax year	1d				
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b	The second quarter of the tax year	1b																	
c	The third quarter of the tax year	1c																	
d	The fourth quarter of the tax year	1d																	
2 Number of quarter-ends the foreign corporation was a CFC during the tax year ▶		2																	
3 Average amount of U.S. property held (directly or indirectly) by the CFC as of the close of each quarter of the tax year. (Add lines 1a through 1d. Divide this amount by the number on line 2.)		3																	
4 U.S. shareholder's pro rata share of the amount on line 3		4																	
5 Earnings and profits described in section 959(c)(1)(A) with respect to the U.S. shareholder after reductions (if any) for current year distributions that affect the U.S. shareholder's section 959(c)(1) E&P account		5																	
6 Section 956(a)(1) amount. Subtract line 5 from line 4		6																	
7 Applicable earnings:																			
a Current year earnings and profits	7a																		
b Line 7a plus accumulated earnings and profits	7b																		
8 Enter the greater of line 7a or line 7b		8																	
9 Distributions made by the CFC during the tax year		9																	
10 Subtract line 9 from line 8		10																	
11 Earnings and profits described in section 959(c)(1)		11																	
12 Applicable earnings. Subtract line 11 from line 10		12																	
13 Section 956(a)(2) amount. U.S. shareholder's pro rata share of the amount on line 12.		13																	
14 Section 956(a) amount. Enter the smaller of line 6 or line 13		14																	
15 Amount of E&P described in section 959(a)(2) with respect to the U.S. shareholder		15																	
16 Tentative section 956 amount. Subtract line 15 from line 14		16																	
17 Amount of deduction under section 245A, if any, that the shareholder would be allowed if the shareholder received a hypothetical distribution within the meaning of Regulations section 1.956-1(a)(2). If the shareholder is not a U.S. corporation, this amount is zero		17																	
18 Section 956 Inclusion. Subtract line 17 from line 16		18																	
19 Translate the amount on line 18 from functional currency to U.S. dollars at the year-end spot rate (as provided in section 989(b)). Enter the result here and on line 2 of Schedule I		19																	