

Anywork Finance Incorporated00-0000003**FORM 1120 TEST SCENARIO 3**

FORMS REQUIRED: 1120, Sch G (F1120), Sch M-3 (F1120), Sch N (F1120), 926, 1118(4), Sch J (F1118), Sch K (F1118) (2), 5471 (2), Sch E (5471)(3), Sch H (F5471), Sch J (F5471)(3), Sch I-1 (F5471), Sch M (F5471), Sch O (F5471), 5472, 8832, 8858(2), 8992, 8993

ATTACHMENTS:

ItemizedOtherDeductionsSchedule
ItemizedOtherCurrentAssetsSchedule
ItemizedOtherInvestmentSchedule
ItemizedOtherInvestmentsSchedule
NonincludibleForeignEntitySchedule
OtherIncomeLossItemsWithDifferencesSchedule
OtherExpenseDeductionItemsWithDifferencesSchedule
OtherReductionOfTaxesSchedule
Category3FilerStatement
ItemizedOtherDeductionsSchedule2
ItemizedOtherCurrentAssetsSchedule
ItemizedOtherCurrentLiabilitesSchedule
ItemizedOtherLiabilitiesSchedule
EarningsAndProfitsOtherAdjStmt

BINARY ATTACHMENTS: Organizational Chart for Form 5471 Sch O

HEADER INFO: Not on actual form

MultipleSoftwarePackagesUsed: No

Originator: EFIN: Self-select
Type: ERO
Practitioner PIN:
EFIN: Self-select
PIN: Self-select
PIN Entered by: ERO

Signature Option: PIN Number

Officer: Name: Poppy Seed
Title: Chief Executive Officer
Officer PIN: 000-00-1234
Taxpayer PIN: Self-select
Phone: 888-555-1212
Email Address: poppyseed@IFI.com
Date signed: 02/15/2021

Preparer Name: Johnny Appleseed

Date Prepared: 02/15/2021

IRS PAYMENT: N/A

Prior Year Income Amt: \$417,113

Tax Year 2021

1120 MeF ATS Scenario 3

September 9, 2021

Name Control:

ANYW

Additional notes: Form 8832 has no information on page 3. Form 5471 (Sch J) has no information on page 3.
 Form 1118 with Separate Category GEN has no information on page 6, 7, 8, 9, 10, 11, 13, and 14
 Form 1118 with Separate Category 951A has no information on page 5- 14
 Form 1118 with Separate Category FB has no information on page 3- 14
 Form 1118 with Separate Category PAS has no information on page 3-14

Attachment 1, F1120, Line 26, Other Deductions (ItemizedOtherDeductionsSchedule)

Description	Amount
Audit Fees	68,160
Professional Expenses	31,227
Financial Service Costs	21,000
TOTAL*	120,387

*The total amount is not part of the dependency schema; it is for illustrative purposes only.

Attachment 2, F1120, Schedule L, Line 6(b) & (d), Other Current Assets (ItemizedOtherCurrentAssetsSchedule)

Other Current Asset Description	Beginning Amount	Ending Amount
Pre-paid Expenses & Special Deposits	35,726	35,726

Attachment 3, F1120, Schedule L, Line 9 (b) & (d), Other Investments (ItemizedOtherInvestmentsSchedule)

Other Investment Description	Beginning Amount	Ending Amount
Investments in Subsidiaries	139,197,191	250,072,971

Attachment 4, F1120, Schedule M-3, Line 5 (a), Net Income From Nonincludible Foreign Entities (NonincludibleForeignEntitySchedule)

Name	EIN	Net income (loss) Amount	Total Assets	Total liabilities	Net amounts
Foreign Finance Corporation	APPLD FOR	41,193,236	76,436,862	6,395,936	0

Attachment 5, F1120, Sch M-3, Part II, Line 25, Other Income (Loss) Items with Differences (OtherIncomeLossItemsWithDifferencesSchedule)

Description	Income (Loss) per Income Statement Amount	Temporary Difference Amount	Permanent Difference Amount	Other Permanent Differences for Allocations to Non-ECI and ECI	Income (Loss) per Tax Return Amount
Recovery of Expense	512,526	-512,526	0	0	0

Attachment 6, F1120, Schedule M-3, Part III, Line 38, Other Expenses/Deduction Items with Differences (OtherExpenseDeductionItemsWithDifferencesSchedule)

Description	Expense per Income Statement Amount	Temporary Difference Amount	Permanent Difference Amount	Other Permanent Differences for Allocations to Non-ECI and ECI	Deductions per Tax Return Amount
Other Expense	(256,260)	256,260	0	0	0

Attachment 7, F1118, Sch G, Line F, Other Reduction of Taxes Schedule
OtherReductionOfTaxesSchedule

245A reduction	11,788,082
965(g) reduction	134,925
Total Other Reduction Amount	11,923,007

Attachment 8, F5471, Box B(3), Category of filer checkboxes (Category3FilerStatement)

Amount of Indebtedness	0
Type of Indebtedness	New acquisition
Name	Foreign Finance Corporation
US Address	75 Any Street, Austin, TX 78737
EIN/SSN/Missing EIN	APPLD FOR
Number of Shares	1000

Attachment 9, F5471, Sch C, Line 17, Other Deductions (ItemizedOtherDeductionsSchedule2)

Description	Foreign Amount	Amount
Miscellaneous Deductions	199,936	295,720
Operating Supplies	356,382	527,114
TOTAL*	556,318	822,834

*The total amount is not part of the dependency schema; it is for illustrative purposes only.

Attachment 10, F5471, Schedule F, Line 5 (a) & (b), Other Current Assets (ItemizedOtherCurrentAssetsSchedule)

Other Current Asset Description	Beginning Amount	Ending Amount
Miscellaneous	255,108	243,012

Attachment 11, F5471, Schedule F, Line 8 (a) & (b), Other Investments (ItemizedOtherInvestmentSchedule)

Other Investment Description	Beginning Amount	Ending Amount
Investments in Stock (Non-affiliated)	57,437	36,820,277

Attachment 12, F5471, Schedule F, Line 16 (a) & (b), Other Current Liabilities (ItemizedOtherCurrentLiabilitiesSchedule)

Other Current Liability Description	Beginning Amount	Ending Amount
Other accrued liabilities	4,001,670	5,080,202

Attachment 13, F5471, Schedule F, Line 19 (a) & (b), Other Liabilities (ItemizedOtherLiabilitiesSchedule)

Other Liability Description	Beginning Amount	Ending Amount
Deferred Federal Income Taxes	2,016,428	1,247,422

Attachment 14, F5471, Schedule H, Line 2i, Other (EarningsAndProfitsOtherAdjStmnt)

Recognize Exchange Gain on Note (Net Additions)	1,848,728
Reverse Stock Write-down (Net Additions)	86,410
Reverse Book Remediation Reserve (Net Additions)	11,146
TOTAL* (Net Additions)	1,946,284*
Reverse Book Exchange Gain (Net Subtractions)	515,184
TOTAL* (Net Subtractions)	515,184*

September 9, 2021

1120 MeF ATS Scenario 3

U.S. Corporation Income Tax Return

OMB No. 1545-0123

Form 1120 Department of the Treasury Internal Revenue Service

For calendar year 2020 or tax year beginning January 01, 2020, ending December 31, 2021

2020

Go to www.irs.gov/Form1120 for instructions and the latest information.

A Check if:

- 1a Consolidated return (attach Form 851)
b Life/nonlife consolidated return
2 Personal holding co. (attach Sch. PH)
3 Personal service corp. (see instructions)
4 Schedule M-3 attached

TYPE OR PRINT

Name: Anywork Finance Incorporated
Number, street, and room or suite no. If a P.O. box, see instructions: 35 Any Street
City or town, state or province, country, and ZIP or foreign postal code: Anytown, NY 10006

B Employer identification number: 00-0000003
C Date incorporated: 08-01-1985
D Total assets (see instructions): \$ 250,306,361

E Check if: (1) Initial return (2) Final return (3) Name change (4) Address change

Table with 3 columns: Line number, Description, Amount. Includes lines 1a-11 for Income, totaling 45,843,620.

Table with 3 columns: Line number, Description, Amount. Includes lines 12-29c for Deductions, totaling 320,387.

Table with 3 columns: Line number, Description, Amount. Includes lines 30-37 for Taxable Income and Payments, totaling 168,000.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Sign Here: Signature of officer, Date, Chief Executive Officer, Title

May the IRS discuss this return with the preparer shown below? See instructions. [X] Yes [] No

Paid Preparer Use Only: Print/Type preparer's name, Preparer's signature, Date, Check if self-employed, PTIN, Firm's name, Firm's EIN, Firm's address, Phone no.

Tax Year 2021
1120 MeF ATS Scenario 3

September 9, 2021

Form 1120 (2020)

Page **2**

Schedule C	Dividends, Inclusions, and Special Deductions (see instructions)	(a) Dividends and inclusions	(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		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 and certain FSCs		50	
7	Dividends from 20%-or-more-owned foreign corporations and certain FSCs		65	
8	Dividends from owned subsidiaries		100	
9	Subtotal. Add lines 1 through 8. See instructions for limitations		See instructions	
10	Dividends from domestic corporations received by a small business investment company operating under the Small Business Investment Act of 1958		100	
11	Dividends from affiliated group members		100	
12	Dividends from certain FSCs		100	
13	Foreign-source portion of dividends received from a specified 10%-owned foreign corporation (excluding hybrid dividends) (see instructions)		100	
14	Dividends from foreign corporations not included on line 3, 6, 7, 8, 11, 12, or 13 (including any hybrid dividends)			
15	Section 965(a) inclusion		See instructions	
16a	Subpart F inclusions derived from the sale by a controlled foreign corporation (CFC) of the stock of a lower-tier foreign corporation treated as a dividend (attach Form(s) 5471) (see instructions)	43,668,620	100	43,668,620
b	Subpart F inclusions derived from hybrid dividends of tiered corporations (attach Form(s) 5471) (see instructions)			
c	Other inclusions from CFCs under subpart F not included on line 15, 16a, 16b, or 17 (attach Form(s) 5471) (see instructions)	160,000		
17	Global Intangible Low-Taxed Income (GILTI) (attach Form(s) 5471 and Form 8992)	700,000		
18	Gross-up for foreign taxes deemed paid	215,000		
19	IC-DISC and former DISC dividends not included on line 1, 2, or 3			
20	Other dividends			
21	Deduction for dividends paid on certain preferred stock of public utilities			
22	Section 250 deduction (attach Form 8993)			437,500
23	Total dividends and inclusions. Add column (a), lines 9 through 20. Enter here and on page 1, line 4	44,743,620		
24	Total special deductions. Add column (c), lines 9 through 22. Enter here and on page 1, line 29b			44,106,120

Schedule J Tax Computation and Payment (see instructions)

Part I—Tax Computation

1	Check if the corporation is a member of a controlled group (attach Schedule O (Form 1120)). See instructions <input type="checkbox"/>		
2	Income tax. See instructions	2	297,594
3	Base erosion minimum tax amount (attach Form 8991)	3	
4	Add lines 2 and 3	4	297,594
5a	Foreign tax credit (attach Form 1118)	5a	129,594
b	Credit from Form 8834 (see instructions)	5b	
c	General business credit (attach Form 3800)	5c	
d	Credit for prior year minimum tax (attach Form 8827)	5d	
e	Bond credits from Form 8912	5e	
6	Total credits. Add lines 5a through 5e	6	129,594
7	Subtract line 6 from line 4	7	168,000
8	Personal holding company tax (attach Schedule PH (Form 1120))	8	
9a	Recapture of investment credit (attach Form 4255)	9a	
b	Recapture of low-income housing credit (attach Form 8611)	9b	
c	Interest due under the look-back method—completed long-term contracts (attach Form 8697)	9c	
d	Interest due under the look-back method—income forecast method (attach Form 8866)	9d	
e	Alternative tax on qualifying shipping activities (attach Form 8902)	9e	
f	Interest/tax due under Section 453A(c) and/or Section 453(l)	9f	
g	Other (see instructions—attach statement)	9g	
10	Total. Add lines 9a through 9g	10	
11	Total tax. Add lines 7, 8, and 10. Enter here and on page 1, line 31	11	168,000

Part II—Section 965 Payments (see instructions)

12	2020 net 965 tax liability paid from Form 965-B, Part II, column (k), line 4. Enter here and on page 1, line 32	12	0
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Part III—Payments, Refundable Credits, and Section 965 Net Tax Liability

13	2019 overpayment credited to 2020	13	1,678,103
14	2020 estimated tax payments	14	15,000,000
15	2020 refund applied for on Form 4466	15	()
16	Combine lines 13, 14, and 15	16	16,678,103
17	Tax deposited with Form 7004	17	
18	Withholding (see instructions)	18	
19	Total payments. Add lines 16, 17, and 18	19	16,678,103
20	Refundable credits from:		
a	Form 2439	20a	
b	Form 4136	20b	
c	Reserved for future use	20c	
d	Other (attach statement—see instructions)	20d	
21	Total credits. Add lines 20a through 20d	21	0
22	2020 net 965 tax liability from Form 965-B, Part I, column (d), line 4. See instructions	22	
23	Total payments, credits, and section 965 net tax liability. Add lines 19, 21, and 22. Enter here and on page 1, line 33	23	16,678,103

Schedule K Other Information (see instructions)

1 Check accounting method: a Cash b Accrual c Other (specify) ▶ _____

2 See the instructions and enter the:

a Business activity code no. ▶ _____ 522293

b Business activity ▶ International Finance

c Product or service ▶ International Finance

3 Is the corporation a subsidiary in an affiliated group or a parent–subsidiary controlled group? Yes No
 If “Yes,” enter name and EIN of the parent corporation ▶ ABC Finance (ABCF) 00-000021

4 At the end of the tax year:

a Did any foreign or domestic corporation, partnership (including any entity treated as a partnership), trust, or tax-exempt organization own directly 20% or more, or own, directly or indirectly, 50% or more of the total voting power of all classes of the corporation’s stock entitled to vote? If “Yes,” complete Part I of Schedule G (Form 1120) (attach Schedule G) Yes No

b Did any individual or estate own directly 20% or more, or own, directly or indirectly, 50% or more of the total voting power of all classes of the corporation’s stock entitled to vote? If “Yes,” complete Part II of Schedule G (Form 1120) (attach Schedule G) Yes No

5 At the end of the tax year, did the corporation:

a Own directly 20% or more, or own, directly or indirectly, 50% or more of the total voting power of all classes of stock entitled to vote of any foreign or domestic corporation not included on Form 851, Affiliations Schedule? For rules of constructive ownership, see instructions. Yes No
 If “Yes,” complete (i) through (iv) below.

(i) Name of Corporation	(ii) Employer Identification Number (if any)	(iii) Country of Incorporation	(iv) Percentage Owned in Voting Stock
Foreign Finance Corporation		UK	100 %
Foreign Sands		NL	100%

b Own directly an interest of 20% or more, or own, directly or indirectly, an interest of 50% or more in any foreign or domestic partnership (including an entity treated as a partnership) or in the beneficial interest of a trust? For rules of constructive ownership, see instructions. Yes No
 If “Yes,” complete (i) through (iv) below.

(i) Name of Entity	(ii) Employer Identification Number (if any)	(iii) Country of Organization	(iv) Maximum Percentage Owned in Profit, Loss, or Capital

6 During this tax year, did the corporation pay dividends (other than stock dividends and distributions in exchange for stock) in excess of the corporation’s current and accumulated earnings and profits? See sections 301 and 316 Yes No
 If “Yes,” file Form 5452, Corporate Report of Nondividend Distributions. See the instructions for Form 5452.
 If this is a consolidated return, answer here for the parent corporation and on Form 851 for each subsidiary.

7 At any time during the tax year, did one foreign person own, directly or indirectly, at least 25% of the total voting power of all classes of the corporation’s stock entitled to vote or at least 25% of the total value of all classes of the corporation’s stock? Yes No
 For rules of attribution, see section 318. If “Yes,” enter:
 (a) Percentage owned ▶ 100 and (b) Owner’s country ▶ UK
 (c) The corporation may have to file Form 5472, Information Return of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business. Enter the number of Forms 5472 attached ▶ 1

8 Check this box if the corporation issued publicly offered debt instruments with original issue discount
 If checked, the corporation may have to file Form 8281, Information Return for Publicly Offered Original Issue Discount Instruments.

9 Enter the amount of tax-exempt interest received or accrued during the tax year ▶ \$ _____

10 Enter the number of shareholders at the end of the tax year (if 100 or fewer) ▶ _____

11 If the corporation has an NOL for the tax year and is electing to forego the carryback period, check here (see instructions)
 If the corporation is filing a consolidated return, the statement required by Regulations section 1.1502-21(b)(3) must be attached or the election will not be valid.

12 Enter the available NOL carryover from prior tax years (do not reduce it by any deduction reported on page 1, line 29a.) ▶ \$ _____

Schedule K Other Information (continued from page 4)

Table with 2 columns: Question (13-26) and Yes/No checkboxes. Includes questions about receipts/assets, UTP filing, Form 1099, ownership changes, asset transfers, cooperative basis, interest/royalty, gross receipts, 163(j) election, and Form 8996.

Schedule L Balance Sheets per Books		Beginning of tax year		End of tax year	
		(a)	(b)	(c)	(d)
Assets					
1	Cash		250,328		192,664
2a	Trade notes and accounts receivable				
b	Less allowance for bad debts	()		()	
3	Inventories				
4	U.S. government obligations				
5	Tax-exempt securities (see instructions)				
6	Other current assets (attach statement)		35,726		35,726
7	Loans to shareholders		5,000		5,000
8	Mortgage and real estate loans				
9	Other investments (attach statement)		139,197,191		250,072,971
10a	Buildings and other depreciable assets				
b	Less accumulated depreciation	()		()	
11a	Depletable assets				
b	Less accumulated depletion	()		()	
12	Land (net of any amortization)				
13a	Intangible assets (amortizable only)				
b	Less accumulated amortization	()		()	
14	Other assets (attach statement)				
15	Total assets		139,488,245		250,306,361
Liabilities and Shareholders' Equity					
16	Accounts payable				
17	Mortgages, notes, bonds payable in less than 1 year				
18	Other current liabilities (attach statement)				
19	Loans from shareholders				
20	Mortgages, notes, bonds payable in 1 year or more				
21	Other liabilities (attach statement)				
22	Capital stock: a Preferred stock				
	b Common stock	5,000	5,000	5,000	5,000
23	Additional paid-in capital		139,231,622		249,913,859
24	Retained earnings—Appropriated (attach statement)				
25	Retained earnings—Unappropriated		251,623		387,502
26	Adjustments to shareholders' equity (attach statement)				
27	Less cost of treasury stock	()		()	
28	Total liabilities and shareholders' equity		139,488,245		250,306,361

Schedule M-1 Reconciliation of Income (Loss) per Books With Income per Return

Note: The corporation may be required to file Schedule M-3. See instructions.

1	Net income (loss) per books		7	Income recorded on books this year not included on this return (itemize):	
2	Federal income tax per books			Tax-exempt interest \$ _____	
3	Excess of capital losses over capital gains			_____	
4	Income subject to tax not recorded on books this year (itemize): _____		8	Deductions on this return not charged against book income this year (itemize):	
5	Expenses recorded on books this year not deducted on this return (itemize):		a	Depreciation . . . \$ _____	
a	Depreciation \$ _____		b	Charitable contributions \$ _____	
b	Charitable contributions . . . \$ _____			_____	
c	Travel and entertainment . . . \$ _____		9	Add lines 7 and 8	
6	Add lines 1 through 5		10	Income (page 1, line 28)—line 6 less line 9	

Schedule M-2 Analysis of Unappropriated Retained Earnings per Books (Schedule L, Line 25)

1	Balance at beginning of year	251,623	5	Distributions: a Cash	
2	Net income (loss) per books	135,879		b Stock	
3	Other increases (itemize): _____			c Property	
	_____		6	Other decreases (itemize): _____	
	_____		7	Add lines 5 and 6	
4	Add lines 1, 2, and 3	387,502	8	Balance at end of year (line 4 less line 7)	387,502

1120 MeF ATS Scenario 3
Information on Certain Persons Owning the Corporation's Voting Stock

SCHEDULE G (Form 1120)

(Rev. December 2011) Department of the Treasury Internal Revenue Service

Attach to Form 1120. See instructions on page 2.

OMB No. 1545-0123

Table with 2 columns: Name (Anywork Finance Incorporated) and Employer identification number (EIN) (00-0000003)

Part I Certain Entities Owning the Corporation's Voting Stock. (Form 1120, Schedule K, Question 4a). Complete columns (i) through (v) below for any foreign or domestic corporation, partnership (including any entity treated as a partnership), trust, or tax-exempt organization that owns directly 20% or more, or owns, directly or indirectly, 50% or more of the total voting power of all classes of the corporation's stock entitled to vote (see instructions).

Table with 5 columns: (i) Name of Entity, (ii) Employer Identification Number (if any), (iii) Type of Entity, (iv) Country of Organization, (v) Percentage Owned in Voting Stock. Row 1: ABC Finance, 00-0000021, Corporation, UK, 100%

Part II Certain Individuals and Estates Owning the Corporation's Voting Stock. (Form 1120, Schedule K, Question 4b). Complete columns (i) through (iv) below for any individual or estate that owns directly 20% or more, or owns, directly or indirectly, 50% or more of the total voting power of all classes of the corporation's stock entitled to vote (see instructions).

Table with 4 columns: (i) Name of Individual or Estate, (ii) Identifying Number (if any), (iii) Country of Citizenship (see instructions), (iv) Percentage Owned in Voting Stock. (Empty rows)

(Rev. December 2019)
Department of the Treasury
Internal Revenue Service

Attach to Form 1120 or 1120-C.

Go to www.irs.gov/Form1120 for instructions and the latest information.

Name of corporation (common parent, if consolidated return)

Employer identification number

Anywork Finance Incorporated

00-0000003

- Check applicable box(es): (1) [X] Non-consolidated return (2) [] Consolidated return (Form 1120 only)
(3) [] Mixed 1120/L/PC group (4) [] Dormant subsidiaries schedule attached

Part I Financial Information and Net Income (Loss) Reconciliation (see instructions)

- 1a Did the corporation file SEC Form 10-K for its income statement period ending with or within this tax year?
b Did the corporation prepare a certified audited non-tax-basis income statement for that period?
c Did the corporation prepare a non-tax-basis income statement for that period?
2a Enter the income statement period: Beginning MM/DD/YYYY Ending MM/DD/YYYY
b Has the corporation's income statement been restated for the income statement period on line 2a?
c Has the corporation's income statement been restated for any of the five income statement periods immediately preceding the period on line 2a?
3a Is any of the corporation's voting common stock publicly traded?
b Enter the symbol of the corporation's primary U.S. publicly traded voting common stock
c Enter the nine-digit CUSIP number of the corporation's primary publicly traded voting common stock

Table with 2 columns: Description and Amount. Rows include 4a Worldwide consolidated net income (loss) from income statement source identified in Part I, line 1 (41,193,236), 5a Net income from nonincludible foreign entities, 6a Net income from nonincludible U.S. entities, 7a Net income (loss) of other includible foreign disregarded entities, 8 Adjustment to eliminations of transactions between includible entities and nonincludible entities, 9 Adjustment to reconcile income statement period to tax year, 10a Intercompany dividend adjustments to reconcile to line 11, 10b Other statutory accounting adjustments to reconcile to line 11, 10c Other adjustments to reconcile to amount on line 11, 11 Net income (loss) per income statement of includible corporations (135,879).

12 Enter the total amount (not just the corporation's share) of the assets and liabilities of all entities included or removed on the following lines.

Table with 3 columns: Description, Total Assets, Total Liabilities. Rows include a Included on Part I, line 4 (326,743,223 / 6,395,936), b Removed on Part I, line 5 (76,436,862 / 6,395,936), c Removed on Part I, line 6, d Included on Part I, line 7.

Name of corporation (common parent, if consolidated return) <u>Anywork Finance Incorporated</u>	Employer identification number 00-0000003
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group	
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations	
Name of subsidiary (if consolidated return)	Employer identification number

Part II Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return (see instructions)

	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
Income (Loss) Items (Attach statements for lines 1 through 12)				
1 Income (loss) from equity method foreign corporations				
2 Gross foreign dividends not previously taxed				
3 Subpart F, QEF, and similar income inclusions		43,668,620		43,668,620
4 Gross-up for foreign taxes deemed paid				
5 Gross foreign distributions previously taxed				
6 Income (loss) from equity method U.S. corporations				
7 U.S. dividends not eliminated in tax consolidation				
8 Minority interest for includible corporations				
9 Income (loss) from U.S. partnerships				
10 Income (loss) from foreign partnerships				
11 Income (loss) from other pass-through entities				
12 Items relating to reportable transactions				
13 Interest income (see instructions)				
14 Total accrual to cash adjustment				
15 Hedging transactions				
16 Mark-to-market income (loss)				
17 Cost of goods sold (see instructions)	()			()
18 Sale versus lease (for sellers and/or lessors)				
19 Section 481(a) adjustments				
20 Unearned/deferred revenue				
21 Income recognition from long-term contracts				
22 Original issue discount and other imputed interest				
23a Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities				
b Gross capital gains from Schedule D, excluding amounts from pass-through entities				
c Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
d Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses				
e Abandonment losses				
f Worthless stock losses (attach statement)				
g Other gain/loss on disposition of assets other than inventory				
24 Capital loss limitation and carryforward used				
25 Other income (loss) items with differences (attach statement)	512,526	(512,526)		
26 Total income (loss) items. Combine lines 1 through 25	512,526	43,156,094		43,668,620
27 Total expense/deduction items (from Part III, line 39)	(256,260)	256,260		0
28 Other items with no differences	(120,387)			(120,387)
29a Mixed groups, see instructions. All others, combine lines 26 through 28	135,879	43,412,354		45,548,233
b PC insurance subgroup reconciliation totals				
c Life insurance subgroup reconciliation totals				
30 Reconciliation totals. Combine lines 29a through 29c	135,879	43,412,354		43,548,233

Note: Line 30, column (a), must equal Part I, line 11, and column (d) must equal Form 1120, page 1, line 28.

Name of corporation (common parent, if consolidated return) <u>Anywork Finance Incorporated</u>	Employer identification number 00-000003
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group	
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations	
Name of subsidiary (if consolidated return)	Employer identification number

Part III Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return—Expense/Deduction Items (see instructions)

	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 U.S. current income tax expense				
2 U.S. deferred income tax expense				
3 State and local current income tax expense				
4 State and local deferred income tax expense				
5 Foreign current income tax expense (other than foreign withholding taxes)				
6 Foreign deferred income tax expense				
7 Foreign withholding taxes				
8 Interest expense (see instructions)				
9 Stock option expense				
10 Other equity-based compensation				
11 Meals and entertainment				
12 Fines and penalties				
13 Judgments, damages, awards, and similar costs				
14 Parachute payments				
15 Compensation with section 162(m) limitation				
16 Pension and profit-sharing				
17 Other post-retirement benefits				
18 Deferred compensation				
19 Charitable contribution of cash and tangible property				
20 Charitable contribution of intangible property				
21 Charitable contribution limitation/carryforward				
22 Domestic production activities deduction (see instructions).				
23 Current year acquisition or reorganization investment banking fees				
24 Current year acquisition or reorganization legal and accounting fees				
25 Current year acquisition/reorganization other costs				
26 Amortization/impairment of goodwill				
27 Amortization of acquisition, reorganization, and start-up costs				
28 Other amortization or impairment write-offs				
29 Reserved				
30 Depletion				
31 Depreciation				
32 Bad debt expense				
33 Corporate owned life insurance premiums				
34 Purchase versus lease (for purchasers and/or lessees)				
35 Research and development costs				
36 Section 118 exclusion (attach statement)				
37 Section 162(r)—FDIC premiums paid by certain large financial institutions (see instructions)				
38 Other expense/deduction items with differences (attach statement)	256,260	(256,260)		0
39 Total expense/deduction items. Combine lines 1 through 38. Enter here and on Part II, line 27, reporting positive amounts as negative and negative amounts as positive	256,260	(256,260)		0

SCHEDULE N (Form 1120)

Foreign Operations of U.S. Corporations

Department of the Treasury Internal Revenue Service

Attach to Form 1120, 1120-C, 1120-IC-DISC, 1120-L, 1120-PC, 1120-REIT, 1120-RIC, or 1120-S.

Go to www.irs.gov/Form1120 for the latest information.

2020

Name Anywork Finance Incorporated

Employer identification number (EIN) 00-0000003

Foreign Operations Information

Table with columns 'Yes' and 'No' containing questions 1a through 8 regarding foreign operations, including ownership of foreign entities, partnerships, and financial accounts.

1120 MeF ATS Scenario 3
Return by a U.S. Transferor of Property to a Foreign Corporation

Form 926
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

Go to www.irs.gov/Form926 for instructions and the latest information.
Attach to your income tax return for the year of the transfer or distribution.

OMB No. 1545-0026

Attachment
Sequence No. 128

Part I U.S. Transferor Information (see instructions)

Name of transferor: Anywork Finance, Incorporated
Identifying number (see instructions): 00-0000003

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?
2 If the transferor was a corporation, complete questions 2a through 2d.
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations?
b Did the transferor remain in existence after the transfer?
If not, list the controlling shareholder(s) and their identifying number(s).

Table with 2 columns: Controlling shareholder, Identifying number

- c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?
If not, list the name and employer identification number (EIN) of the parent corporation.

Table with 2 columns: Name of parent corporation, EIN of parent corporation

- d Have basis adjustments under section 367(a)(4) been made?
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
a List the name and EIN of the transferor's partnership.

Table with 2 columns: Name of partnership, EIN of partnership

- b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?
c Is the partner disposing of its entire interest in the partnership?
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?

Part II Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation): Foreign Finance Corporation
5a Identifying number, if any: 00-0000045

6 Address (including country): 75 Any Street, Birmingham, England 126375
5b Reference ID number (see instructions)

7 Country code of country of incorporation or organization (see instructions): UK

8 Foreign law characterization (see instructions): Corporation

- 9 Is the transferee foreign corporation a controlled foreign corporation?

Part III Information Regarding Transfer of Property (see instructions)

Section A—Cash

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	09-30-2020		100,333		

10 Was cash the only property transferred? Yes No
 If "Yes," skip the remainder of Part III and go to Part IV.

Section B—Other Property (other than intangible property subject to section 367(d))

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities	08-25-2020	IDD Stock	25,752	35,452	0
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? Yes No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? Yes No
 If "Yes," go to line 12b.

b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . . Yes No
 If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? Yes No
 If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

d Enter the transferred loss amount included in gross income as required under section 91 ► \$ _____

13 Did the transferor transfer property described in section 367(d)(4)? Yes No
 If "No," skip Section C and questions 14a through 15.

Section C—Intangible Property Subject to Section 367(d)

Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? Yes No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Yes No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? Yes No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ _____
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)? Yes No

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV Additional Information Regarding Transfer of Property (see instructions)

- 16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
(a) Before 100 % (b) After 100 %
- 17 Type of nonrecognition transaction (see instructions) ► 356
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
 - a Gain recognition under section 904(f)(3) Yes No
 - b Gain recognition under section 904(f)(5)(F) Yes No
 - c Recapture under section 1503(d) Yes No
 - d Exchange gain under section 987 Yes No
- 19 Did this transfer result from a change in entity classification? Yes No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions . Yes No
If "Yes," complete lines 20b and 20c.
 - b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ _____
 - c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions Yes No

▶ Attach to the corporation's tax return.
 ▶ Go to www.irs.gov/Form1118 for instructions and the latest information.

For calendar year 20 **21**, or other tax year beginning , 20 , and ending , 20

Name of corporation

Anywork Finance Incorporated

Employer identification number

00-000003

Use a separate Form 1118 for each applicable category of income (see instructions).

- a Separate Category (Enter code—see instructions.) ▶ GEN
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶
- c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Schedule A Income or (Loss) Before Adjustments (Report all amounts in U.S. dollars. See Specific Instructions.)

		Gross Income or (Loss) From Sources Outside the United States						
1. EIN or Reference ID Number (see instructions)*	2. Foreign Country or U.S. Possession (enter two-letter code—use a separate line for each) (see instructions)	3. Inclusions Under Sections 951(a)(1) and 951A (see instructions)		4. Dividends (see instructions)		5. Interest		
		(a) Exclude Gross-Up	(b) Gross-Up (section 78)	(a) Exclude Gross-Up	(b) Gross-Up (section 78)			
A	00-0000045	UK	43,668,620					
B	00-0000046	NL						
C								
Totals (add lines A through C)			43,668,620					
6. Gross Rents, Royalties, and License Fees		7. Sales	8. Gross Income From Performance of Services	9. Section 986(c) Gain	10. Section 987 Gain	11. Section 988 Gain	12. Other (attach schedule)	
A								
B								
C								
Totals								
13. Total (add columns 3(a) through 12)		14. Allocable Deductions						
	(a) Dividends Received Deduction (see instructions)	(b) Deduction Allowed Under Section 250(a)(1)(A)—Foreign Derived Intangible Income	(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	Rental, Royalty, and Licensing Expenses		(f) Expenses Allocable to Sales Income		
				(d) Depreciation, Depletion, and Amortization	(e) Other Allocable Expenses			
A	43,668,620	43,668,620						
B								
C								
Totals		43,668,620	43,668,620					
14. Allocable Deductions (continued)			15. Apportioned Share of Deductions (enter amount from applicable line of Schedule H, Part II, column (d))	16. Net Operating Loss Deduction	17. Total Deductions (add columns 14(i) through 16)	18. Total Income or (Loss) Before Adjustments (subtract column 17 from column 13)		
(g) Expenses Allocable to Gross Income From Performance of Services	(h) Other Allocable Deductions (attach schedule) (see instructions)	(i) Total Allocable Deductions (add columns 14(a) through 14(h))						
A		120,387	43,789,007		43,789,007	-120,387		
B								
C								
Totals		120,387	43,789,007		43,789,007	-120,387		

*For section 863(b) income, NOLs, income from RICs, high-taxed income, section 965, section 951A, and reattribution of income by reason of disregarded payments, use a single line (see instructions). Also, for reporting branches that are QBUs, use a separate line for each such branch.

**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

Form 1118 (Rev. 12-2020)

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Schedule B Foreign Tax Credit (Report all foreign tax amounts in U.S. dollars.)

Part I—Foreign Taxes Paid, Accrued, and Deemed Paid (see instructions)

1. Credit Is Claimed for Taxes (check one): <input type="checkbox"/> Paid <input type="checkbox"/> Accrued		2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)					
		Tax Withheld at Source on:					
		(a) Dividends	(b) Distributions of Previously Taxed Earnings and Profits	(c) Branch Remittances	(d) Interest	(e) Rents, Royalties, and License Fees	(f) Other
	Date Paid	Date Accrued					
A							
B							
C							
Totals (add lines A through C)							

2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)				3. Tax Deemed Paid (see instructions)
Other Foreign Taxes Paid or Accrued on:				
(g) Sales	(h) Services Income	(i) Other	(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))	
A				11,788,082
B				175,000
C				
Totals				11,963,082

Part II—Separate Foreign Tax Credit (Complete a separate Part II for each applicable category of income.)

1a	Total foreign taxes paid or accrued (total from Part I, column 2(j))		
b	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)		
2	Total taxes deemed paid (total from Part I, column 3)	11,963,082	
3	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G)	(11,923,007)	
4	Taxes reclassified under high-tax kickout		
5	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year		
6	Total foreign taxes (combine lines 1a through 5)		40,075
7	Enter the amount from the applicable column of Schedule J, Part I, line 11 (see instructions). If Schedule J is not required to be completed, enter the result from the "Totals" line of column 18 of the applicable Schedule A		0
8a	Total taxable income from all sources (enter taxable income from the corporation's tax return)	1,417,113	
b	Adjustments to line 8a (see instructions)		
c	Subtract line 8b from line 8a		1,417,113
9	Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1		0
10	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)		297,594
11	Multiply line 9 by line 10		0
12	Increase in limitation (section 960(c))		0
13	Credit limitation (add lines 11 and 12) (see instructions)		0
14	Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III		0

Tax Year 2021
1120 MeF ATS Scenario 3

September 9, 2021

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Schedule B Foreign Tax Credit (continued) (Report all foreign tax amounts in U.S. dollars.)

Part III—Summary of Separate Credits (Enter amounts from Part II, line 14 for each applicable category of income. Do not include taxes paid to sanctioned countries.)

1	Credit for taxes on section 951A category income	
2	Credit for taxes on foreign branch category income	
3	Credit for taxes on passive category income	
4	Credit for taxes on general category income	
5	Credit for taxes on section 901(j) category income (combine all such credits on this line)	
6	Credit for taxes on income re-sourced by treaty (combine all such credits on this line)	
7	Total (add lines 1 through 6)	
8	Reduction in credit for international boycott operations (see instructions)	
9	Total foreign tax credit (subtract line 8 from line 7). Enter here and on the appropriate line of the corporation's tax return	▶

Schedule C Tax Deemed Paid With Respect to Section 951(a)(1) Inclusions by Domestic Corporation Filing Return (Section 960(a))

Use this schedule to report the tax deemed paid by the corporation with respect to section 951(a)(1) inclusions of earnings from foreign corporations under section 960(a). For each line in Schedule C, include the column 10 amount in column 3 of the line in Schedule B, Part I that corresponds with the identifying number specified in column 1 of Schedule A and that also corresponds with the identifying number entered in column 1b of this Schedule C (see instructions).

1a. Name of Foreign Corporation	1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	1c. QBU Reference ID (if applicable)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code—see instructions)	4. Functional Currency of Foreign Corporation (enter code - see instructions)	5. Subpart F Income Group		
						(a) Reg. sec. 1.960-1(d)(2)(ii)(B)(2)(enter code)	(b) Reg. sec. 1.904-4(c)(3)(i)-(iv) (enter code)	(c) Unit
Foreign Finance Corp	00-0000045		201912	UK	GBP			
6. Total Net Income in Subpart F Income Group (in functional currency of foreign corporation)	7. Total Current Year Taxes in Subpart F Income Group (in U.S. Dollars)	8. Section 951(a)(1) Inclusion Attributable to Subpart F Income Group		9. Divide column 8(a) by column 6	10. Tax Deemed Paid (multiply column 7 by column 9)			
		(a) Functional Currency	(b) U.S. Dollars					
161,917,394	3,180,665	600,093,170	43,688,620	3.70616865	11,788,082			
Total (add amounts in column 10)					▶ 11,788,082			

**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

Form 1118 (Rev. 12-2020)

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Schedule D Tax Deemed Paid With Respect to Section 951A Income by Domestic Corporation Filing the Return (Section 960(d))

Use this schedule to figure the tax deemed paid by the corporation with respect to section 951A inclusions of earnings from foreign corporations under section 960(d).

Part I—Foreign Corporation’s Tested Income and Foreign Taxes

1a. Name of Foreign Corporation	1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code—see instructions)	4. Functional Currency of Foreign Corporation (enter code)	5. Pro rata share of CFC’s tested income from applicable Form 8992 schedule (see instructions)	6. CFC’s tested income from applicable Form 8992 schedule (see instructions)	7. Divide column 5 by column 6	8. CFC’s tested foreign income taxes from Schedule Q (Form 5471) (see instructions)	9. Pro rata share of tested foreign income taxes paid or accrued by CFC (Multiply amount in column 7 by amount in column 8)
Total (add amounts in column 5)					▶				
Total (add amounts in column 9)					▶				

Part II—Foreign Income Tax Deemed Paid

1. Global Intangible Low-Taxed Income (Section 951A Inclusion)	2. Inclusion Percentage. Divide Part II, Column 1, by Part I, Column 5 Total	3. Multiply Part I, Column 9 Total, by Part II, Column 2 Percentage	4. Tax Deemed Paid (Multiply Part II, column 3, by 80%. Enter the result here and include on the line of Schedule B, Part I, column 3 that corresponds with the line with “951A” in column 2 of Schedule A.)

September 9, 2021

Form 1118 (Rev. 12-2020)

Schedule E Tax Deemed Paid With Respect to Previously Taxed Earnings and Profits (PTEP) by Domestic Corporation Filing the Return (Section 960(b))

Part I—Tax Deemed Paid by Domestic Corporation

Use this part to report the tax deemed paid by the domestic corporation with respect to distributions of PTEP from first-tier foreign corporations under section 960(b). For each line in Schedule E, Part I, include the column 11 amount in column 3 of the line in Schedule B, Part I that corresponds with the identifying number specified in column 1 of Schedule A and that also corresponds with the identifying number specified in column 1b of this Schedule E, Part I (see instructions).

1a. Name of Distributing Foreign Corporation	1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code—see instructions)	4. Functional Currency of the Distributing Foreign Corporation	5. PTEP Group (enter code)	6. Annual PTEP account (enter year)	7. Total amount of PTEP in the PTEP Group	8. Total amount of the PTEP group taxes with respect to PTEP group	9. Distribution from the PTEP Group	10. Divide column 9 by column 7	11. Foreign income taxes properly attributable to PTEP and not previously deemed paid (multiply column 8 by column 10)
Foreign Sands	00-0000046	201912	NL	EUR					3,500,000		175,000

Total (add amounts in column 11) ▶

Part II—Tax Deemed Paid by First- and Lower-Tier Foreign Corporations

Use this part to report the tax deemed paid by a foreign corporation with respect to distributions of PTEP from lower-tier foreign corporations under section 960(b) that relate to distributions reported in Part I (see instructions).

1a. Name of Distributing Foreign Corporation	1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code—see instructions)	4a. Name of Recipient Foreign Corporation	4b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	5. Tax Year End (Year/Month) (see instructions)	6. Country of Incorporation (enter country code—see instructions)
Foreign Sands	00-0000046	201812	CA			201812	NL

7. Functional Currency of the Distributing Foreign Corporation	8. PTEP Group (enter code)	9. Annual PTEP account (enter year)	10. Total Amount of PTEP in the PTEP Group	11. Total Amount of the PTEP group taxes with respect to PTEP group	12. PTEP Distributed	13. Divide column 12 by column 10	14. Foreign income taxes properly attributable to PTEP and not previously deemed paid (multiply column 11 by column 13)
EUR				3,500,000			175,000

Schedule G Reductions of Taxes Paid, Accrued, or Deemed Paid

Part I—Reduction Amounts

A	Reduction of Taxes Under Section 901(e)—Attach separate schedule	
B	Reduction of Foreign Oil and Gas Taxes—Enter amount from Schedule I, Part II, line 4	
C	Reduction of Taxes Due to International Boycott Provisions—Enter appropriate portion from Schedule C (Form 5713) (see instructions). Important: Enter only “specifically attributable taxes” here	
D	Reduction of Taxes for Section 6038(c) Penalty—Attach separate schedule	
E	Taxes suspended under section 909	
F	Other Reductions of Taxes	11,923,007
	1. Enter code—see instructions ► <u>OTH</u>	
	2. If more than one code is entered on line F1 or if code OTH is entered on line F1, attach schedule (see instructions).	
Total	(add lines A through F). Enter here and on Schedule B, Part II, line 3 ►	11,923,007

Part II—Other Information

G	Check this box if, during the tax year, the corporation paid or accrued any foreign tax that was disqualified for credit under section 901(m) ► <input type="checkbox"/>
H	Check this box if, during the tax year, the corporation paid or accrued any foreign tax that was disqualified for credit under section 901(j), (k), or (l) ► <input type="checkbox"/>

▶ Attach to the corporation's tax return.
 ▶ Go to www.irs.gov/Form1118 for instructions and the latest information.

For calendar year 20 **21**, or other tax year beginning , 20 , and ending , 20

Name of corporation

Anywork Finance Incorporated

Employer identification number

00-000003

Use a separate Form 1118 for each applicable category of income (see instructions).

- a Separate Category (Enter code—see instructions.) ▶ 951A
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶
- c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Schedule A Income or (Loss) Before Adjustments (Report all amounts in U.S. dollars. See Specific Instructions.)

Gross Income or (Loss) From Sources Outside the United States						
1. EIN or Reference ID Number (see instructions)*	2. Foreign Country or U.S. Possession (enter two-letter code—use a separate line for each) (see instructions)	3. Inclusions Under Sections 951(a)(1) and 951A (see instructions)		4. Dividends (see instructions)		5. Interest
		(a) Exclude Gross-Up	(b) Gross-Up (section 78)	(a) Exclude Gross-Up	(b) Gross-Up (section 78)	
A	00-0000046	NL	700,000	175,000		
B						
C						
Totals (add lines A through C)			700,000	175,000		
6. Gross Rents, Royalties, and License Fees	7. Sales	8. Gross Income From Performance of Services	9. Section 986(c) Gain	10. Section 987 Gain	11. Section 988 Gain	12. Other (attach schedule)
A						
B						
C						
Totals						
13. Total (add columns 3(a) through 12)	14. Allocable Deductions					18. Total Income or (Loss) Before Adjustments (subtract column 17 from column 13)
	(a) Dividends Received Deduction (see instructions)	(b) Deduction Allowed Under Section 250(a)(1)(A)—Foreign Derived Intangible Income	(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	Rental, Royalty, and Licensing Expenses		
	(d) Depreciation, Depletion, and Amortization	(e) Other Allocable Expenses				
A	875,000		437,500			
B						
C						
Totals	875,000		437,500			
14. Allocable Deductions (continued)			15. Apportioned Share of Deductions (enter amount from applicable line of Schedule H, Part II, column (d))	16. Net Operating Loss Deduction	17. Total Deductions (add columns 14(i) through 16)	18. Total Income or (Loss) Before Adjustments (subtract column 17 from column 13)
(g) Expenses Allocable to Gross Income From Performance of Services	(h) Other Allocable Deductions (attach schedule) (see instructions)	(i) Total Allocable Deductions (add columns 14(a) through 14(h))				
A		437,500			437,500	437,500
B						
C						
Totals		437,500			437,500	437,500

*For section 863(b) income, NOLs, income from RICs, high-taxed income, section 965, section 951A, and reattribution of income by reason of disregarded payments, use a single line (see instructions). Also, for reporting branches that are QBUs, use a separate line for each such branch.

Tax Year 2021
1120 MeF ATS Scenario 3

September 9, 2021

Form 1118 (Rev. 12-2020)

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Schedule B Foreign Tax Credit (Report all foreign tax amounts in U.S. dollars.)

Part I—Foreign Taxes Paid, Accrued, and Deemed Paid (see instructions)

1. Credit Is Claimed for Taxes (check one): <input type="checkbox"/> Paid <input type="checkbox"/> Accrued		2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)					
		Tax Withheld at Source on:					
		(a) Dividends	(b) Distributions of Previously Taxed Earnings and Profits	(c) Branch Remittances	(d) Interest	(e) Rents, Royalties, and License Fees	(f) Other
A	Date Paid	Date Accrued					
B							
C							
Totals (add lines A through C)							

2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)				3. Tax Deemed Paid (see instructions)
Other Foreign Taxes Paid or Accrued on:				
	(g) Sales	(h) Services Income	(i) Other	(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))
A				140,000
B				
C				
Totals				

Part II—Separate Foreign Tax Credit (Complete a *separate* Part II for *each* applicable category of income.)

1a	Total foreign taxes paid or accrued (total from Part I, column 2(j))		
b	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)		
2	Total taxes deemed paid (total from Part I, column 3)	140,000	
3	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G)	()	
4	Taxes reclassified under high-tax kickout		
5	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year		
6	Total foreign taxes (combine lines 1a through 5)		140,000
7	Enter the amount from the applicable column of Schedule J, Part I, line 11 (see instructions). If Schedule J is not required to be completed, enter the result from the "Totals" line of column 18 of the applicable Schedule A		366,084
8a	Total taxable income from all sources (enter taxable income from the corporation's tax return)	1,417,113	
b	Adjustments to line 8a (see instructions)		
c	Subtract line 8b from line 8a		1,417,113
9	Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1		0.258330846
10	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)		297,594
11	Multiply line 9 by line 10		76,878
12	Increase in limitation (section 960(c))		0
13	Credit limitation (add lines 11 and 12) (see instructions)		76,878
14	Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III		76,878

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Schedule B Foreign Tax Credit (continued) (Report all foreign tax amounts in U.S. dollars.)

Part III—Summary of Separate Credits (Enter amounts from Part II, line 14 for each applicable category of income. Do not include taxes paid to sanctioned countries.)

1	Credit for taxes on section 951A category income	76,878	
2	Credit for taxes on foreign branch category income	17,572	
3	Credit for taxes on passive category income	35,144	
4	Credit for taxes on general category income	0	
5	Credit for taxes on section 901(j) category income (combine all such credits on this line)		
6	Credit for taxes on income re-sourced by treaty (combine all such credits on this line)		
7	Total (add lines 1 through 6)	129,594	
8	Reduction in credit for international boycott operations (see instructions)		
9	Total foreign tax credit (subtract line 8 from line 7). Enter here and on the appropriate line of the corporation's tax return	129,594	

Schedule C Tax Deemed Paid With Respect to Section 951(a)(1) Inclusions by Domestic Corporation Filing Return (Section 960(a))

Use this schedule to report the tax deemed paid by the corporation with respect to section 951(a)(1) inclusions of earnings from foreign corporations under section 960(a). For each line in Schedule C, include the column 10 amount in column 3 of the line in Schedule B, Part I that corresponds with the identifying number specified in column 1 of Schedule A and that also corresponds with the identifying number entered in column 1b of this Schedule C (see instructions).

1a. Name of Foreign Corporation	1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	1c. QBU Reference ID (if applicable)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code—see instructions)	4. Functional Currency of Foreign Corporation (enter code - see instructions)	5. Subpart F Income Group		
						(a) Reg. sec. 1.960-1(d)(2)(ii)(B)(2)(enter code)	(b) Reg. sec. 1.904-4(c)(3)(i)-(iv) (enter code)	(c) Unit
6. Total Net Income in Subpart F Income Group (in functional currency of foreign corporation)	7. Total Current Year Taxes in Subpart F Income Group (in U.S. Dollars)	8. Section 951(a)(1) Inclusion Attributable to Subpart F Income Group		9. Divide column 8(a) by column 6	10. Tax Deemed Paid (multiply column 7 by column 9)			
		(a) Functional Currency	(b) U.S. Dollars					
Total (add amounts in column 10)								

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Schedule D Tax Deemed Paid With Respect to Section 951A Income by Domestic Corporation Filing the Return (Section 960(d))

Use this schedule to figure the tax deemed paid by the corporation with respect to section 951A inclusions of earnings from foreign corporations under section 960(d).

Part I—Foreign Corporation's Tested Income and Foreign Taxes

1a. Name of Foreign Corporation	1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code—see instructions)	4. Functional Currency of Foreign Corporation (enter code)	5. Pro rata share of CFC's tested income from applicable Form 8992 schedule (see instructions)	6. CFC's tested income from applicable Form 8992 schedule (see instructions)	7. Divide column 5 by column 6	8. CFC's tested foreign income taxes from Schedule Q (Form 5471) (see instructions)	9. Pro rata share of tested foreign income taxes paid or accrued by CFC (Multiply amount in column 7 by amount in column 8)
Foreign Sands	00-0000046	201912	NL	EUR	800,000	200,000	4	50,000	200,000
Total (add amounts in column 5)									
Total (add amounts in column 9)									200,000

Part II—Foreign Income Tax Deemed Paid

1. Global Intangible Low-Taxed Income (Section 951A Inclusion)	2. Inclusion Percentage. Divide Part II, Column 1, by Part I, Column 5 Total	3. Multiply Part I, Column 9 Total, by Part II, Column 2 Percentage	4. Tax Deemed Paid (Multiply Part II, column 3, by 80%. Enter the result here and include on the line of Schedule B, Part I, column 3 that corresponds with the line with "951A" in column 2 of Schedule A.)
700,000	.875	175,000	140,000

▶ Attach to the corporation's tax return.
 ▶ Go to www.irs.gov/Form1118 for instructions and the latest information.

For calendar year 20 **21**, or other tax year beginning , 20 , and ending , 20

Name of corporation

Anywork Finance Incorporated

Employer identification number

00-0000003

Use a separate Form 1118 for each applicable category of income (see instructions).

- a Separate Category (Enter code—see instructions.) ▶ FB
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶
- c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Schedule A Income or (Loss) Before Adjustments (Report all amounts in U.S. dollars. See Specific Instructions.)

	1. EIN or Reference ID Number (see instructions)*	2. Foreign Country or U.S. Possession (enter two-letter code—use a separate line for each) (see instructions)	3. Inclusions Under Sections 951(a)(1) and 951A (see instructions)				4. Dividends (see instructions)		5. Interest
			(a) Exclude Gross-Up		(b) Gross-Up (section 78)		(a) Exclude Gross-Up	(b) Gross-Up (section 78)	
A	00-0000018	NL							
B									
C									
Totals (add lines A through C)									

	6. Gross Rents, Royalties, and License Fees	7. Sales	8. Gross Income From Performance of Services	9. Section 986(c) Gain	10. Section 987 Gain	11. Section 988 Gain	12. Other (attach schedule)
A		200,000	100,000				
B							
C							
Totals		200,000	100,000				

	13. Total (add columns 3(a) through 12)	14. Allocable Deductions				(f) Expenses Allocable to Sales Income	
		(a) Dividends Received Deduction (see instructions)	(b) Deduction Allowed Under Section 250(a)(1)(A)—Foreign Derived Intangible Income	(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	Rental, Royalty, and Licensing Expenses		
					(d) Depreciation, Depletion, and Amortization		(e) Other Allocable Expenses
A	300,000					150,000	
B							
C							
Totals	300,000					150,000	

	14. Allocable Deductions (continued)			15. Apportioned Share of Deductions (enter amount from applicable line of Schedule H, Part II, column (d))	16. Net Operating Loss Deduction	17. Total Deductions (add columns 14(i) through 16)	18. Total Income or (Loss) Before Adjustments (subtract column 17 from column 13)
	(g) Expenses Allocable to Gross Income From Performance of Services	(h) Other Allocable Deductions (attach schedule) (see instructions)	(i) Total Allocable Deductions (add columns 14(a) through 14(h))				
A	50,000					200,000	100,000
B							
C							
Totals	50,000					200,000	100,000

*For section 863(b) income, NOLs, income from RICs, high-taxed income, section 965, section 951A, and reattribution of income by reason of disregarded payments, use a single line (see instructions). Also, for reporting branches that are QBUs, use a separate line for each such branch.

Tax Year 2021
1120 MeF ATS Scenario 3

September 9, 2021

Form 1118 (Rev. 12-2020)

Page **2**

Schedule B Foreign Tax Credit (Report all foreign tax amounts in U.S. dollars.)

Part I—Foreign Taxes Paid, Accrued, and Deemed Paid (see instructions)

1. Credit Is Claimed for Taxes (check one): <input type="checkbox"/> Paid <input type="checkbox"/> Accrued		2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) Tax Withheld at Source on:					
		(a) Dividends	(b) Distributions of Previously Taxed Earnings and Profits	(c) Branch Remittances	(d) Interest	(e) Rents, Royalties, and License Fees	(f) Other
A	Date Paid	Date Accrued					
B							
C							
Totals (add lines A through C)							

2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) Other Foreign Taxes Paid or Accrued on:				3. Tax Deemed Paid (see instructions)
(g) Sales	(h) Services Income	(i) Other	(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))	
A	13,333	6,667	20,000	
B				
C				
Totals				

Part II—Separate Foreign Tax Credit (Complete a *separate* Part II for *each* applicable category of income.)

1a	Total foreign taxes paid or accrued (total from Part I, column 2(j))	20,000	
b	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)		
2	Total taxes deemed paid (total from Part I, column 3)		
3	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G)	()	
4	Taxes reclassified under high-tax kickout		
5	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year		
6	Total foreign taxes (combine lines 1a through 5)		20,000
7	Enter the amount from the applicable column of Schedule J, Part I, line 11 (see instructions). If Schedule J is not required to be completed, enter the result from the "Totals" line of column 18 of the applicable Schedule A		83,676
8a	Total taxable income from all sources (enter taxable income from the corporation's tax return)	1,417,113	
b	Adjustments to line 8a (see instructions)		
c	Subtract line 8b from line 8a		1,417,113
9	Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1		0.059046809
10	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)		297,594
11	Multiply line 9 by line 10		17,572
12	Increase in limitation (section 960(c))		0
13	Credit limitation (add lines 11 and 12) (see instructions)		17,572
14	Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III		17,572

▶ Attach to the corporation's tax return.
 ▶ Go to www.irs.gov/Form1118 for instructions and the latest information.

For calendar year 20 **21**, or other tax year beginning , 20 , and ending , 20

Name of corporation

Anywork Finance Incorporated

Employer identification number

00-0000003

Use a separate Form 1118 for each applicable category of income (see instructions).

- a Separate Category (Enter code—see instructions.) ▶ PAS
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶
- c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶

Schedule A Income or (Loss) Before Adjustments (Report all amounts in U.S. dollars. See Specific Instructions.)

	1. EIN or Reference ID Number (see instructions)*	2. Foreign Country or U.S. Possession (enter two-letter code—use a separate line for each) (see instructions)	3. Inclusions Under Section 951(a)(1) and 951A (see instructions)				4. Dividends (see instructions)		5. Interest
			(a) Exclude Gross-Up		(b) Gross-Up (section 78)		(a) Exclude Gross-Up	(b) Gross-Up (section 78)	
A	00-0000046	NL	160,000		40,000				
B									
C									
Totals (add lines A through C)			160,000		40,000				

	6. Gross Rents, Royalties, and License Fees	7. Sales	8. Gross Income From Performance of Services	9. Section 986(c) Gain	10. Section 987 Gain	11. Section 988 Gain	12. Other (attach schedule)
A							
B							
C							
Totals							

	13. Total (add columns 3(a) through 12)	14. Allocable Deductions				(f) Expenses Allocable to Sales Income	
		(a) Dividends Received Deduction (see instructions)	(b) Deduction Allowed Under Section 250(a)(1)(A)—Foreign Derived Intangible Income	(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	Rental, Royalty, and Licensing Expenses		
					(d) Depreciation, Depletion, and Amortization		(e) Other Allocable Expenses
A	200,000						
B							
C							
Totals	200,000						

	14. Allocable Deductions (continued)			15. Apportioned Share of Deductions (enter amount from applicable line of Schedule H, Part II, column (d))	16. Net Operating Loss Deduction	17. Total Deductions (add columns 14(i) through 16)	18. Total Income or (Loss) Before Adjustments (subtract column 17 from column 13)
	(g) Expenses Allocable to Gross Income From Performance of Services	(h) Other Allocable Deductions (attach schedule) (see instructions)	(i) Total Allocable Deductions (add columns 14(a) through 14(h))				
A							200,000
B							
C							
Totals							200,000

*For section 863(b) income, NOLs, income from RICs, high-taxed income, section 965, section 951A, and reattribution of income by reason of disregarded payments, use a single line (see instructions). Also, for reporting branches that are QBUs, use a separate line for each such branch.

**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

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Schedule B Foreign Tax Credit (Report all foreign tax amounts in U.S. dollars.)

Part I—Foreign Taxes Paid, Accrued, and Deemed Paid (see instructions)

1. Credit Is Claimed for Taxes (check one): <input type="checkbox"/> Paid <input type="checkbox"/> Accrued		2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)					
		Tax Withheld at Source on:					
		(a) Dividends	(b) Distributions of Previously Taxed Earnings and Profits	(c) Branch Remittances	(d) Interest	(e) Rents, Royalties, and License Fees	(f) Other
	Date Paid	Date Accrued					
A							
B							
C							
Totals (add lines A through C)							

2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)				3. Tax Deemed Paid (see instructions)
Other Foreign Taxes Paid or Accrued on:				
	(g) Sales	(h) Services Income	(i) Other	(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))
A				40,000
B				
C				
Totals				

Part II—Separate Foreign Tax Credit (Complete a *separate* Part II for *each* applicable category of income.)

1a	Total foreign taxes paid or accrued (total from Part I, column 2(j))	40,000	
b	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)		
2	Total taxes deemed paid (total from Part I, column 3)		
3	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G)	()	
4	Taxes reclassified under high-tax kickout		
5	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year		
6	Total foreign taxes (combine lines 1a through 5)	40,000	
7	Enter the amount from the applicable column of Schedule J, Part I, line 11 (see instructions). If Schedule J is not required to be completed, enter the result from the "Totals" line of column 18 of the applicable Schedule A	167,353	
8a	Total taxable income from all sources (enter taxable income from the corporation's tax return)	1,417,113	
b	Adjustments to line 8a (see instructions)		
c	Subtract line 8b from line 8a	1,417,113	
9	Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1	0.118094323	
10	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)	297,594	
11	Multiply line 9 by line 10	35,144	
12	Increase in limitation (section 960(c))	0	
13	Credit limitation (add lines 11 and 12) (see instructions)	35,144	
14	Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III	35,144	

September 9, 2021
SCHEDULE K
(Form 1118)

(Rev. December 2018)

Department of the Treasury
 Internal Revenue Service

Name of corporation

Anywork Finance Incorporated

Tax Year 2021
1120 MeF ATS Scenario 3
Foreign Tax Carryover Reconciliation Schedule

For calendar year 20 _____, or other tax year beginning _____, 20 _____, and ending _____, 20 _____.

▶ See separate instructions.

▶ Attach to Form 1118.

▶ Go to www.irs.gov/Form1118 for instructions and the latest information.

OMB No. 1545-0123

Employer identification number

00 000003

Use a separate Schedule K (Form 1118) for each category of income (see instructions).

- a Separate Category (enter code—see instructions) ▶ FB
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶ _____
- c If code RBT is entered on line a, enter the country code for the treaty country (see instructions) ▶ _____

Foreign Tax Carryover Reconciliation	(i) 10th Preceding Tax Year	(ii) 9th Preceding Tax Year	(iii) 8th Preceding Tax Year	(iv) 7th Preceding Tax Year	(v) 6th Preceding Tax Year	(vi) 5th Preceding Tax Year	(vii) Subtotal (add columns (i) through (vi))
1 Foreign tax carryover from the prior tax year (enter amounts from the appropriate columns of line 8 of the prior year Schedule K (see instructions))							
2 Adjustments to line 1 (enter description—see instructions):							
a Carryback adjustment (see instructions)							
b Adjustments for section 905(c) redeterminations (see instructions)							
c							
d							
e							
f							
g							
3 Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2)							
4 Foreign tax carryover used in current tax year (enter as a negative number)							
5 Foreign tax carryover expired unused in current tax year (enter as a negative number)							
6 Foreign tax carryover generated in current tax year							
7 Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number)							
8 Foreign tax carryover to the following tax year. Combine lines 3 through 7.	-0-						

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1120 MeF ATS Scenario 3

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Schedule K (Form 1118) (Rev. 12-2018)

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Foreign Tax Carryover Reconciliation <i>(continued)</i>	(viii) Subtotal from page 1 (enter the amounts from column (vii) on page 1)	(ix) 4th Preceding Tax Year	(x) 3rd Preceding Tax Year	(xi) 2nd Preceding Tax Year	(xii) 1st Preceding Tax Year	(xiii) Current Tax Year	(xiv) Totals (add columns (viii) through (xiii))
1 Foreign tax carryover from the prior tax year (enter amounts from the appropriate columns of line 8 of the prior year Schedule K (see instructions))							
2 Adjustments to line 1 (enter description—see instructions):							
a Carryback adjustment (see instructions)							
b Adjustments for section 905(c) redeterminations (see instructions)							
c							
d							
e							
f							
g							
3 Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2). Include the column (xiv) total on the current year Form 1118, Schedule B, Part II, line 5.							
4 Foreign tax carryover used in current tax year (enter as a negative number)							
5 Foreign tax carryover expired unused in current tax year (enter as a negative number)							
6 Foreign tax carryover generated in current tax year						2,428	2,428
7 Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number)							
8 Foreign tax carryover to the following tax year. Combine lines 3 through 7.						2,428	2,428

September 9, 2021
SCHEDULE K
(Form 1118)

(Rev. December 2018)

Department of the Treasury
 Internal Revenue Service

Name of corporation

Anywork Finance Incorporated

Tax Year 2021
1120 MeF ATS Scenario 3
Foreign Tax Carryover Reconciliation Schedule

For calendar year 20 _____, or other tax year beginning _____, 20 _____, and ending _____, 20 _____.

▶ See separate instructions.

▶ Attach to Form 1118.

▶ Go to www.irs.gov/Form1118 for instructions and the latest information.

OMB No. 1545-0123

Employer identification number

00 000003

Use a separate Schedule K (Form 1118) for each category of income (see instructions).

- a Separate Category (enter code—see instructions) ▶ PAS
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶ _____
- c If code RBT is entered on line a, enter the country code for the treaty country (see instructions) ▶ _____

Foreign Tax Carryover Reconciliation	(i) 10th Preceding Tax Year	(ii) 9th Preceding Tax Year	(iii) 8th Preceding Tax Year	(iv) 7th Preceding Tax Year	(v) 6th Preceding Tax Year	(vi) 5th Preceding Tax Year	(vii) Subtotal (add columns (i) through (vi))
1 Foreign tax carryover from the prior tax year (enter amounts from the appropriate columns of line 8 of the prior year Schedule K (see instructions))							
2 Adjustments to line 1 (enter description—see instructions):							
a Carryback adjustment (see instructions)							
b Adjustments for section 905(c) redeterminations (see instructions)							
c							
d							
e							
f							
g							
3 Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2)							
4 Foreign tax carryover used in current tax year (enter as a negative number)							
5 Foreign tax carryover expired unused in current tax year (enter as a negative number)							
6 Foreign tax carryover generated in current tax year							
7 Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number)							
8 Foreign tax carryover to the following tax year. Combine lines 3 through 7.	-0-						

Tax Year 2021
1120 MeF ATS Scenario 3

September 9, 2021

Schedule K (Form 1118) (Rev. 12-2018)

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Foreign Tax Carryover Reconciliation (<i>continued</i>)	(viii) Subtotal from page 1 (enter the amounts from column (vii) on page 1)	(ix) 4th Preceding Tax Year	(x) 3rd Preceding Tax Year	(xi) 2nd Preceding Tax Year	(xii) 1st Preceding Tax Year	(xiii) Current Tax Year	(xiv) Totals (add columns (viii) through (xiii))
1 Foreign tax carryover from the prior tax year (enter amounts from the appropriate columns of line 8 of the prior year Schedule K (see instructions))							
2 Adjustments to line 1 (enter description—see instructions):							
a Carryback adjustment (see instructions)							
b Adjustments for section 905(c) redeterminations (see instructions)							
c							
d							
e							
f							
g							
3 Adjusted foreign tax carryover from prior tax year (combine lines 1 and 2). Include the column (xiv) total on the current year Form 1118, Schedule B, Part II, line 5.							
4 Foreign tax carryover used in current tax year (enter as a negative number)							
5 Foreign tax carryover expired unused in current tax year (enter as a negative number)							
6 Foreign tax carryover generated in current tax year						4,856	4,856
7 Actual or estimated amount of line 6 to be carried back to prior tax year (enter as a negative number)							
8 Foreign tax carryover to the following tax year. Combine lines 3 through 7.						4,856	4,856

**Schedule J
(Form 1118)**

(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

Tax Year 2021

1120 MeF ATS Scenario 3

**Adjustments to Separate Limitation Income (Loss) Categories for
Determining Numerators of Limitation Fractions, Year-End Recharacterization Balances,
and Overall Foreign and Domestic Loss Account Balances**

For calendar year 20 20, or other tax year beginning _____, 20____, and ending _____, 20____

▶ **Attach to Form 1118.**

OMB No. 1545-0123

Name of corporation

Anywork Finance, Incorporated

Employer identification number

00-0000003

Part I Adjustments to Separate Limitation Income or (Losses) in Determining Numerators of Limitation Fractions (see instructions)

	(i) Section 951A income	(ii) Foreign branch income	(iii) Passive category income	(iv) General category income	(v) Other income* (identify ▶ _____)	(vi) U.S. income
1 Income or (loss) before adjustments	437,500	100,000	200,000	120,387		
2 Allocation of separate limitation losses:						
a Section 951A income	()	()	()	()	()	
b Foreign branch income	()	()	()	()	()	
c Passive category income	()	()	()	()	()	
d General category income	(71,416)	(16,324)	(32,647)	120,387	()	
e Other income* (identify ▶ _____)	()	()	()	()		
3 Subtotal —Combine lines 1 through 2e.	366,084	83,676	167,353			
4 Allocation of overall foreign losses						()
5 Allocation of domestic losses	()	()	()	()	()	
6 Subtotal —Combine lines 3 through 5.	366,084	83,676	167,353			
7 Recapture of overall foreign losses	()	()	()	()	()	
8 Subtotal —Combine lines 6 and 7.	366,084	83,676	167,353			
9 Recharacterization of separate limitation income:						
a Section 951A income	()					
b Foreign branch income		()				
c Passive category income			()			
d General category income				()		
e Other income* (identify ▶ _____)					()	
10 Recapture of overall domestic losses						()
11 Numerator of Limitation Fraction — Combine lines 8 through 10. Enter each result here and on Schedule B, Part II, line 7, of corresponding Form 1118.	366,084	83,676	167,353	0		

*Important: See **Computer-Generated Schedule J** in instructions.

For Paperwork Reduction Act Notice, see the Instructions for Form 1118.

Cat. No. 10309U

Schedule J (Form 1118) (Rev. 12-2020)

**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

Schedule J (Form 1118) (Rev. 12-2020)

Page **2**

Part II Year-End Balances of Future Separate Limitation Income That Must Be Recharacterized (section 904(f)(5)(C))

	(i) Section 951A income	(ii) Foreign branch income	(iii) Passive category income	(iv) General category income	(v) Other income* (identify ▶ _____ _____)	(vi) U.S. income
a Section 951A income						
b Foreign branch income						
c Passive category income						
d General category income	71,416	16,324	32,647			
e Other income* (identify ▶ _____)						

Part III Overall Foreign Loss Account Balances (section 904(f)(1)) Complete for each separate limitation income category.

1 Beginning balance						
2 Current year additions						
3 Current year reductions (other than recapture)	()	()	()	()	()	
4 Current year recapture (from Part I, line 7)	()	()	()	()	()	
5 Ending balance —Combine lines 1 through 4.						

Part IV Overall Domestic Loss Account Balances (section 904(g)(1))

1 Beginning balance						
2 Current year additions						
3 Current year reductions (other than recapture)	()	()	()	()	()	
4 Subtotal —Combine lines 1 through 3.						
5 Current year recapture (from Part I, line 10)						
6 Ending balance —Subtract line 5 from line 4.						

*Important: See **Computer-Generated Schedule J** in instructions.

September 9, 2021

1120 MeF ATS Scenario 3

Information Return of U.S. Persons With Respect to Certain Foreign Corporations

Form **5471**

OMB No. 1545-0123

(Rev. December 2021)

Go to www.irs.gov/Form5471 for instructions and the latest information.

Department of the Treasury
Internal Revenue Service

Information furnished for the foreign corporation's annual accounting period (tax year required by section 898) (see instructions) beginning Jan 01, 20 21, and ending Dec 31, 20 21

Attachment Sequence No. **121**

Name of person filing this return <u>Anywork Finance Incorporated</u>	A Identifying number <u>00-0000003</u>
Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address) <u>35 Any Street</u>	B Category of filer (See instructions. Check applicable box(es).): 1a <input type="checkbox"/> 1b <input type="checkbox"/> 1c <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input checked="" type="checkbox"/> 4 <input checked="" type="checkbox"/> 5a <input type="checkbox"/> 5b <input type="checkbox"/> 5c <input type="checkbox"/>
City or town, state, and ZIP code <u>Anytown, NY 10006</u>	C Enter the total percentage of the foreign corporation's voting stock you owned at the end of its annual accounting period <u>100%</u>
Filer's tax year beginning <u>January 01</u> , 20 <u>21</u> , and ending <u>December 31</u> , 20 <u>21</u>	

- D** Check box if this is a final Form 5471 for the foreign corporation
- E** Check if any excepted specified foreign financial assets are reported on this form (see instructions)
- F** Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40
- G** If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions)
- H** Person(s) on whose behalf this information return is filed:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation <u>Foreign Finance Corporation</u> <u>75 Any Street</u> <u>Birmingham, England 126375</u>	b(1) Employer identification number, if any <u>00-0000045</u>
	b(2) Reference ID number (see instructions) <u>ABC1234</u>
	c Country under whose laws incorporated <u>UK</u>
d Date of incorporation <u>01/01/1990</u>	e Principal place of business <u>United Kingdom</u>
f Principal business activity code number <u>523900</u>	g Principal business activity <u>Financial Investment</u>
	h Functional currency code <u>GBP</u>

2 Provide the following information for the foreign corporation's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States	b If a U.S. income tax return was filed, enter:	
	(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)
c Name and address of foreign corporation's statutory or resident agent in country of incorporation <u>Samuel Addams</u> <u>75 Any Street</u> <u>Birmingham, England 126375</u>	d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation, and the location of such books and records, if different	

Schedule A Stock of the Foreign Corporation

(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period
<u>Common</u>	<u>750</u>	<u>1,000</u>
<u>Preferred</u>	<u>193,710</u>	<u>258,280</u>

September 9, 2021

1120 MeF ATS Scenario 3

Schedule B Shareholders of Foreign Corporation

Part I U.S. Shareholders of Foreign Corporation (see instructions)

(a) Name, address, and identifying number of shareholder	(b) Description of each class of stock held by shareholder. Note: This description should match the corresponding description entered in Schedule A, column (a).	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period	(e) Pro rata share of subpart F income (enter as a percentage)
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003	Common	750	1,000	
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003	Class B Preferred	193,710	258,280	

INTERNAL USE ONLY

Part II Direct Shareholders of Foreign Corporation (see instructions)

(a) Name, address, and identifying number of shareholder. Also, include country of incorporation or formation, if applicable.	(b) Description of each class of stock held by shareholder. Note: This description should match the corresponding description entered in Schedule A, column (a).	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period

DRAFT AS OF
June 23, 2021

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. generally accepted accounting principles (GAAP). Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for dollar approximate separate transactions method (DASTM) corporations.

		Functional Currency	U.S. Dollars	
Income	1a Gross receipts or sales	1a		
	b Returns and allowances	1b		
	c Subtract line 1b from line 1a	1c		
	2 Cost of goods sold	2		
	3 Gross profit (subtract line 2 from line 1c)	3		
	4 Dividends	4		
	5 Interest	5	28,862,341	42,689,456
	6a Gross rents	6a	14,988,962	22,169,741
	b Gross royalties and license fees	6b		
	7 Net gain or (loss) on sale of capital assets	7		
8a Foreign currency transaction gain or loss—unrealized	8a			
b Foreign currency transaction gain or loss—realized	8b			
9 Other income (attach statement)	9			
10 Total income (add lines 3 through 9)	10	43,851,303	64,859,197	
Deductions	11 Compensation not deducted elsewhere	11		
	12a Rents	12a	2,588,175	3,828,095
	b Royalties and license fees	12b		
	13 Interest	13	36,977	54,692
	14 Depreciation not deducted elsewhere	14		
	15 Depletion	15		
	16 Taxes (exclude income tax expense (benefit))	16	121	179
	17 Other deductions (attach statement—exclude income tax expense (benefit))	17	556,318	822,834
18 Total deductions (add lines 11 through 17)	18	3,181,591	4,705,800	
Net Income	19 Net income or (loss) before unusual or infrequently occurring items, and income tax expense (benefit) (subtract line 18 from line 10)	19	40,669,712	60,153,397
	20 Unusual or infrequently occurring items	20	(12,818,965)	(18,960,161)
	21a Income tax expense (benefit)—current	21a		
	b Income tax expense (benefit)—deferred	21b		
22 Current year net income or (loss) per books (combine lines 19 through 21b)	22	27,850,747	41,193,236	
Other Comprehensive Income	23a Foreign currency translation adjustments	23a		
	b Other	23b		
	c Income tax expense (benefit) related to other comprehensive income	23c		
	24 Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c)	24		

Schedule F Balance Sheet

Important: Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1	Cash	8,557,500	3,281,502
2a	Trade notes and accounts receivable	855,858	15,006,554
b	Less allowance for bad debts	()	()
3	Derivatives		
4	Inventories		
5	Other current assets (attach statement)	255,108	243,012
6	Loans to shareholders and other related persons	26,569,964	
7	Investment in subsidiaries (attach statement)		
8	Other investments (attach statement)	57,437	36,820,277
9a	Buildings and other depreciable assets		
b	Less accumulated depreciation	()	()
10a	Depletable assets		
b	Less accumulated depletion	()	()
11	Land (net of any amortization)		
12	Intangible assets:		
a	Goodwill		
b	Organization costs		
c	Patents, trademarks, and other intangible assets	11,727,492	21,085,517
d	Less accumulated amortization for lines 12a, 12b, and 12c	()	()
13	Other assets (attach statement)		
14	Total assets	48,023,359	76,436,862
Liabilities and Shareholders' Equity			
15	Accounts payable		68,312
16	Other current liabilities (attach statement)	4,001,670	5,080,202
17	Derivatives		
18	Loans from shareholders and other related persons		
19	Other liabilities (attach statement)	2,016,428	1,247,422
20	Capital stock:		
a	Preferred stock	57,545,333	76,727,110
b	Common stock	750,000	1,000,000
21	Paid-in or capital surplus (attach reconciliation)		
22	Retained earnings		
23	Less cost of treasury stock	(16,290,072)	(7,686,184)
24	Total liabilities and shareholders' equity	48,023,359	76,436,862

Schedule G Other Information

	Yes	No
1 During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign partnership? If "Yes," see the instructions for required statement.		✓
2 During the tax year, did the foreign corporation own an interest in any trust?		✓
3 During the tax year, did the foreign corporation own any foreign entities that were disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)? If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		✓
4a During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)? If "Yes," complete lines 4b and 4c.		✓
b Enter the total amount of the base erosion payments ▶ \$ _____		
c Enter the total amount of the base erosion tax benefit ▶ \$ _____		
5a During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? If "Yes," complete line 5b.		✓
b Enter the total amount of the disallowed deductions (see instructions) ▶ \$ _____		

Schedule G Other Information (continued)

Table with 2 columns: Question (6a-19a) and Yes/No. Contains various tax-related questions and their corresponding Yes/No checkboxes.

Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name of U.S. shareholder Identifying number

Table with 2 main columns: Description (lines 1a-6) and Amount. Line 1a amount is 43,668,620. Lines 3, 4, 5a-5e are shaded grey.

Table with 2 main columns: Question (7a-9) and Yes/No. Includes questions about blocked income, ED accounts, and hybrid deduction accounts.

September 9, 2021

1120 MeF ATS Scenario 3

Information Return of U.S. Persons With Respect to Certain Foreign Corporations

Form **5471**

OMB No. 1545-0123

(Rev. December 2021)

Go to www.irs.gov/Form5471 for instructions and the latest information.

Department of the Treasury
Internal Revenue Service

Information furnished for the foreign corporation's annual accounting period (tax year required by section 898) (see instructions) beginning Jan 1, 20 21, and ending Dec 31, 20 21

Attachment Sequence No. **121**

Name of person filing this return <u>Anywork Finance Incorporated</u>	A Identifying number <u>00-0000003</u>
Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address) <u>35 Any Street</u>	B Category of filer (See instructions. Check applicable box(es).): 1a <input type="checkbox"/> 1b <input type="checkbox"/> 1c <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input checked="" type="checkbox"/> 4 <input checked="" type="checkbox"/> 5a <input type="checkbox"/> 5b <input type="checkbox"/> 5c <input type="checkbox"/>
City or town, state, and ZIP code <u>Anytown, NY 10006</u>	C Enter the total percentage of the foreign corporation's voting stock you owned at the end of its annual accounting period <u>100%</u>
Filer's tax year beginning <u>January 01</u> , 20 <u>21</u> , and ending <u>December 31</u> , 20 <u>21</u>	

- D** Check box if this is a final Form 5471 for the foreign corporation
- E** Check if any excepted specified foreign financial assets are reported on this form (see instructions)
- F** Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40
- G** If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions)

H Person(s) on whose behalf this information return is filed:

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation <u>Foreign Sands</u> <u>80 Any Street</u> <u>Birmingham, England 126375</u>	b(1) Employer identification number, if any <u>00-0000046</u>
	b(2) Reference ID number (see instructions) <u>ABC8989</u>
	c Country under whose laws incorporated <u>NL</u>
d Date of incorporation <u>01/01/1990</u>	e Principal place of business <u>Netherlands</u>
f Principal business activity code number <u>523900</u>	g Principal business activity <u>Financial Investment</u>
	h Functional currency code <u>EUR</u>

2 Provide the following information for the foreign corporation's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States	b If a U.S. income tax return was filed, enter:	
	(i) Taxable income or (loss)	(ii) U.S. income tax paid (after all credits)
c Name and address of foreign corporation's statutory or resident agent in country of incorporation <u>George Washington</u> <u>80 Any Street</u> <u>Amsterdam, Netherlands</u>	d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation, and the location of such books and records, if different	

Schedule A Stock of the Foreign Corporation

(a) Description of each class of stock	(b) Number of shares issued and outstanding	
	(i) Beginning of annual accounting period	(ii) End of annual accounting period
<u>Common</u>	<u>20,000</u>	<u>40,000</u>
<u>Preferred</u>	<u>200,000</u>	<u>400,000</u>

September 9, 2021

Form 5471 (Rev. 12-2021)

Schedule B Shareholders of Foreign Corporation

Part I U.S. Shareholders of Foreign Corporation (see instructions)

(a) Name, address, and identifying number of shareholder	(b) Description of each class of stock held by shareholder. Note: This description should match the corresponding description entered in Schedule A, column (a).	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period	(e) Pro rata share of subpart F income (enter as a percentage)
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003	Common	20,000	40,000	
Anywork Finance Incorporated 35 Any Street, Anytown, NY 10006 00-0000003	Class B Preferred	200,000	400,000	

INTERNAL USE ONLY

Part II Direct Shareholders of Foreign Corporation (see instructions)

(a) Name, address, and identifying number of shareholder. Also, include country of incorporation or formation, if applicable.	(b) Description of each class of stock held by shareholder. Note: This description should match the corresponding description entered in Schedule A, column (a).	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period

**DRAFT AS OF
June 23, 2021**

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. generally accepted accounting principles (GAAP). Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for dollar approximate separate transactions method (DASTM) corporations.

		Functional Currency	U.S. Dollars
Income	1a Gross receipts or sales	1a 10,000,000	10,000,000
	b Returns and allowances	1b	
	c Subtract line 1b from line 1a	1c	
	2 Cost of goods sold	2 8,000,000	8,000,000
	3 Gross profit (subtract line 2 from line 1c)	3 2,000,000	2,000,000
	4 Dividends	4	
	5 Interest	5	
	6a Gross rents	6a	
	b Gross royalties and license fees	6b 400,000	400,000
	7 Net gain or (loss) on sale of capital assets	7	
8a Foreign currency transaction gain or loss—unrealized	8a		
b Foreign currency transaction gain or loss—realized	8b		
9 Other income (attach statement)	9		
10 Total income (add lines 3 through 9)	10 2,400,000	2,400,000	
Deductions	11 Compensation not deducted elsewhere	11	
	12a Rents	12a	
	b Royalties and license fees	12b 200,000	200,000
	13 Interest	13	
	14 Depreciation not deducted elsewhere	14 1,000,000	1,000,000
	15 Depletion	15	
	16 Taxes (exclude income tax expense (benefit))	16	
	17 Other deductions (attach statement—exclude income tax expense (benefit))	17	
18 Total deductions (add lines 11 through 17)	18 1,200,000	1,200,000	
Net Income	19 Net income or (loss) before unusual or infrequently occurring items, and income tax expense (benefit) (subtract line 18 from line 10)	19 1,200,000	1,200,000
	20 Unusual or infrequently occurring items	20	
	21a Income tax expense (benefit)—current	21a 240,000	240,000
	b Income tax expense (benefit)—deferred	21b	
22 Current year net income or (loss) per books (combine lines 19 through 21b)	22 960,000	960,000	
Other Comprehensive Income	23a Foreign currency translation adjustments	23a	
	b Other		
	c Income tax expense (benefit) related to other comprehensive income	23c	
	24 Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c)	24	

Schedule F Balance Sheet

Important: Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1	Cash	1	
2a	Trade notes and accounts receivable	2a	
b	Less allowance for bad debts	2b	() ()
3	Derivatives	3	
4	Inventories	4	
5	Other current assets (attach statement)	5	
6	Loans to shareholders and other related persons	6	
7	Investment in subsidiaries (attach statement)	7	
8	Other investments (attach statement)	8	
9a	Buildings and other depreciable assets	9a	1,000,000 1,000,000
b	Less accumulated depreciation	9b	() ()
10a	Depletable assets	10a	
b	Less accumulated depletion	10b	() ()
11	Land (net of any amortization)	11	
12	Intangible assets:		
a	Goodwill	12a	
b	Organization costs	12b	
c	Patents, trademarks, and other intangible assets	12c	
d	Less accumulated amortization for lines 12a, 12b, and 12c	12d	() ()
13	Other assets (attach statement)	13	
14	Total assets	14	1,000,000 1,000,000
Liabilities and Shareholders' Equity			
15	Accounts payable	15	
16	Other current liabilities (attach statement)	16	
17	Derivatives	17	
18	Loans from shareholders and other related persons	18	
19	Other liabilities (attach statement)	19	
20	Capital stock:		
a	Preferred stock	20a	
b	Common stock	20b	
21	Paid-in or capital surplus (attach reconciliation)	21	
22	Retained earnings	22 23b	1,000,000 1,000,000
23	Less cost of treasury stock	23	() ()
24	Total liabilities and shareholders' equity	24	1,000,000 1,000,000

Schedule G Other Information

	Yes	No
1 During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign partnership? If "Yes," see the instructions for required statement.		✓
2 During the tax year, did the foreign corporation own an interest in any trust?		✓
3 During the tax year, did the foreign corporation own any foreign entities that were disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)? If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		✓
4a During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)? If "Yes," complete lines 4b and 4c.		✓
b Enter the total amount of the base erosion payments ▶ \$ _____		
c Enter the total amount of the base erosion tax benefit ▶ \$ _____		
5a During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? If "Yes," complete line 5b.		✓
b Enter the total amount of the disallowed deductions (see instructions) ▶ \$ _____		

Schedule G Other Information (continued)

Table with 2 columns: Question (6a-19a) and Yes/No. Contains various tax-related questions and their corresponding Yes/No checkboxes.

Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name of U.S. shareholder Identifying number

Table with columns for line items (1a-6) and amounts. Line 1c contains the value 160,000. A large 'DRAFT AS OF' watermark is overlaid on the table.

Table with columns for questions (7a-9) and Yes/No responses. Questions 7a-7b, 8a-8c, and 9 are listed. A large 'DRAFT AS OF' watermark is overlaid on the table.

September 9, 2021
SCHEDULE E
(Form 5471)

(Rev. December 2021)
 Department of the Treasury
 Internal Revenue Service

Tax Year 2021
1120 MeF ATS Scenario 3
Income, War Profits, and Excess Profits Taxes Paid or Accrued

Version A, Cycle 8

▶ Attach to Form 5471.
 ▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471 Anywork Finance Incorporated		Identifying number 00-000003
Name of foreign corporation Foreign Finance Corporation	EIN (if any) 00-0000045	Reference ID number (see instructions) ABC1234
a Separate Category (Enter code—see instructions.) ▶ GEN b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶ c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶		

Part I Taxes for Which a Foreign Tax Credit Is Allowed
Section 1 – Taxes Paid or Accrued Directly by Foreign Corporation

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Unsuspected Taxes	(d) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(e) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(f) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	
1	Foreign Finance Corporation	00-0000045	<input type="checkbox"/>	UK	2021/01/01	2021/12/31	
2			<input type="checkbox"/>				
3			<input type="checkbox"/>				
4			<input type="checkbox"/>				
	(g) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(h) If taxes are paid on U.S. source income, check box	(i) Local Currency in Which Tax Is Payable (enter code—see instructions)	(j) Tax Paid or Accrued (in local currency in which the tax is payable)	(k) Conversion Rate to U.S. Dollars	(l) In U.S. Dollars (divide column (j) by column (k))	(m) In Functional Currency of Foreign Corporation
1	0	<input type="checkbox"/>	GBP	7,969,922	0.6761	11,788,082	7,969,922
2		<input type="checkbox"/>					
3		<input type="checkbox"/>					
4		<input type="checkbox"/>					
5	Total (combine lines 1 through 4 of column (l)). Also report amount on Schedule E-1, line 4 ▶					11,788,082	
6	Total (combine lines 1 through 4 of column (m)) ▶						7,969,922

Section 2 – Taxes Deemed Paid by Foreign Corporation

	(a) Name of Lower-Tier Distributing Foreign Corporation	(b) EIN or Reference ID Number of Lower-Tier Distributing Foreign Corporation	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					
	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)	
1					
2					
3					
4					
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 ▶				

Tax Year 2021
1120 MeF ATS Scenario 3

September 9, 2021

Schedule E (Form 5471) (Rev. 12-2021)

Name of foreign corporation Foreign Finance Corporation	EIN (if any) 00-0000045	Reference ID number (see instructions) ABC1234
a Separate Category (Enter code—see instructions.) ▶ GEN		
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶ _____		
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶ _____		

Part II Election

For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment?
 Yes No If "Yes," state date of election ▶ _____

Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901(m)	(f) U.S. Taxes	(g) Suspended Tax	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2) ▶								
4	In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions)) ▶								

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation

IMPORTANT: Enter amounts in U.S. dollars.

		Taxes related to:			
		(a) Subpart F Income	(b) Tested Income	(c) Residual Income	(d) Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1)	0-	-0-	-0-	
b	Beginning balance adjustments (attach statement)				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination				
3a	Taxes unsuspending under anti-splitter rules				
b	Taxes suspended under anti-splitter rules				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)	11,788,082			
5	Taxes carried over in nonrecognition transactions				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i)				
7	Other adjustments (attach statement)				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)	11,788,082			
9	Taxes deemed paid with respect to inclusions (see instructions)				
10	Taxes deemed paid with respect to actual distributions				
11	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
12	Other (attach statement)				
13	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))				
14	Reserved for future use				
15	Reduction for other taxes not deemed paid				
16	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12	-0-	-0-	-0-	

**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

Schedule E (Form 5471) (Rev. 12-2021)

Name of foreign corporation Foreign Finance Corporation	EIN (if any) 00-0000045	Reference ID number (see instructions) ABC1234
a Separate Category (Enter code—see instructions.) ▶ <u> GEN </u>		
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶ _____		
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶ _____		

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued)

(e) Taxes related to previously taxed E&P (see instructions)										
	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a										
b										
c										
2										
3a										
b										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										

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June 20, 2021

September 9, 2021
SCHEDULE E
(Form 5471)

(Rev. December 2021)
 Department of the Treasury
 Internal Revenue Service

Tax Year 2021
1120 MeF ATS Scenario 3
Income, War Profits, and Excess Profits Taxes Paid or Accrued

Version A, Cycle 8

▶ Attach to Form 5471.
 ▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471 Anywork Finance Incorporated		Identifying number 00-000003
Name of foreign corporation Foreign Sands	EIN (if any) 00-0000046	Reference ID number (see instructions) ABC8989
a Separate Category (Enter code—see instructions.) ▶ GEN b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶ _____ c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶ _____		

Part I Taxes for Which a Foreign Tax Credit Is Allowed
Section 1 – Taxes Paid or Accrued Directly by Foreign Corporation

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Unsuspected Taxes	(d) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(e) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(f) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)
1	Foreign Sands	00-0000046	<input type="checkbox"/>	NL	2021/01/01	2021/12/31
2			<input type="checkbox"/>			
3			<input type="checkbox"/>			
4			<input type="checkbox"/>			

	(g) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(h) If taxes are paid on U.S. source income, check box	(i) Local Currency in Which Tax Is Payable (enter code—see instructions)	(j) Tax Paid or Accrued (in local currency in which the tax is payable)	(k) Conversion Rate to U.S. Dollars	(l) In U.S. Dollars (divide column (j) by column (k))	(m) In Functional Currency of Foreign Corporation
1	1,000,000	<input type="checkbox"/>	EUR	200,000	1.00000	200,000	200,000
2		<input type="checkbox"/>					
3		<input type="checkbox"/>					
4		<input type="checkbox"/>					
5	Total (combine lines 1 through 4 of column (l)). Also report amount on Schedule E-1, line 4 ▶					200,000	
6	Total (combine lines 1 through 4 of column (m)) ▶						200,000

Section 2 – Taxes Deemed Paid by Foreign Corporation

	(a) Name of Lower-Tier Distributing Foreign Corporation	(b) EIN or Reference ID Number of Lower-Tier Distributing Foreign Corporation	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					

	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)
1				
2				
3				
4				
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 ▶			

Tax Year 2021
1120 MeF ATS Scenario 3

September 9, 2021

Schedule E (Form 5471) (Rev. 12-2021)

Name of foreign corporation Foreign Sands	EIN (if any) 00-0000046	Reference ID number (see instructions) ABC8989
a Separate Category (Enter code—see instructions.) ▶ GEN		
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶ _____		
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶ _____		

Part II Election

For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment?
 Yes No If "Yes," state date of election ▶ _____

Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

1	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(i)	(d) Section 901(k) and (l)	(e) Section 901(j)	(f) U.S. Taxes	(g) Suspended Taxes	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2) ▶ _____								
4	In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions)) ▶ _____								

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation

IMPORTANT: Enter amounts in U.S. dollars.

		Taxes related to:			
		(a) Subpart F Income	(b) Tested Income	(c) Residual Income	(d) Suspended Taxes
1a	Balance at beginning of year (as reported in prior year's Schedule E-1)	0-	-0-	-0-	
b	Beginning balance adjustments (attach statement)				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination				
3a	Taxes unsuspending under anti-splitter rules				
b	Taxes suspended under anti-splitter rules				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)	200,000			
5	Taxes carried over in nonrecognition transactions				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i)				
7	Other adjustments (attach statement)				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)				
9	Taxes deemed paid with respect to inclusions (see instructions)	140,000			
10	Taxes deemed paid with respect to actual distributions				
11	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
12	Other (attach statement)	60,000			
13	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))				
14	Reserved for future use				
15	Reduction for other taxes not deemed paid				
16	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12	-0-	-0-	-0-	

**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

Schedule E (Form 5471) (Rev. 12-2021)

Name of foreign corporation Foreign Sands	EIN (if any) 00-0000046	Reference ID number (see instructions) ABC8989
a Separate Category (Enter code—see instructions.) ▶ <u>GEN</u>		
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶ _____		
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶ _____		

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued)

(e) Taxes related to previously taxed E&P (see instructions)										
	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a	150,000	25,000								
b										
c										
2										
3a										
b										
4										
5										
6										
7										
8										
9										
10	150,000	25,000								
11										
12	0	0								
13										
14										
15										
16										

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September 9, 2021
SCHEDULE E
(Form 5471)

(Rev. December 2021)
 Department of the Treasury
 Internal Revenue Service

Tax Year 2021
1120 MeF ATS Scenario 3
Income, War Profits, and Excess Profits Taxes Paid or Accrued

Version A, Cycle 8

▶ Attach to Form 5471.
 ▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471 Anywork Finance Incorporated		Identifying number 00-000003
Name of foreign corporation Foreign Sands	EIN (if any) 00-0000046	Reference ID number (see instructions) ABC8989
a Separate Category (Enter code—see instructions.) ▶ PAS b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶ _____ c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶ _____		

Part I Taxes for Which a Foreign Tax Credit Is Allowed
Section 1 – Taxes Paid or Accrued Directly by Foreign Corporation

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Unsuspected Taxes	(d) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(e) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(f) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	
1	Foreign Sands	00-0000046	<input type="checkbox"/>	NL	2021/12/31	2021/12/31	
2			<input type="checkbox"/>				
3			<input type="checkbox"/>				
4			<input type="checkbox"/>				
	(g) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(h) If taxes are paid on U.S. source income, check box	(i) Local Currency in Which Tax Is Payable (enter code—see instructions)	(j) Tax Paid or Accrued (in local currency in which the tax is payable)	(k) Conversion Rate to U.S. Dollars	(l) In U.S. Dollars (divide column (j) by column (k))	(m) In Functional Currency of Foreign Corporation
1	0	<input type="checkbox"/>	EUR	40,000	1.00000	40,000	40,000
2		<input type="checkbox"/>					
3		<input type="checkbox"/>					
4		<input type="checkbox"/>					
5	Total (combine lines 1 through 4 of column (l)). Also report amount on Schedule E-1, line 4 ▶					40,000	
6	Total (combine lines 1 through 4 of column (m)) ▶						40,000

Section 2 – Taxes Deemed Paid by Foreign Corporation

	(a) Name of Lower-Tier Distributing Foreign Corporation	(b) EIN or Reference ID Number of Lower-Tier Distributing Foreign Corporation	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					
	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)	
1					
2					
3					
4					
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6 ▶				

Tax Year 2021
1120 MeF ATS Scenario 3

September 9, 2021

Schedule E (Form 5471) (Rev. 12-2021)

Name of foreign corporation Foreign Sands	EIN (if any) 00-0000046	Reference ID number (see instructions) ABC8989
a Separate Category (Enter code—see instructions.) ▶ PAS		
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶ _____		
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶ _____		

Part II Election

For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment?
 Yes No If "Yes," state date of election ▶ _____

Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901	(f) U.S. Taxes	(g) Suspended Taxes	(h) Other	(i) Total
1									
2									
3	In functional currency (combine lines 1 and 2) ▶ _____								
4	In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions)) ▶ _____								

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation

IMPORTANT: Enter amounts in U.S. dollars.

		Taxes related to:			
		(a) Subpart F Income	(b) Tested Income	(c) Residual Income	(d) Suspended Taxes
1a	Balance at beginning of year (as reported in prior year Schedule E-1)	0-	-0-	-0-	
b	Beginning balance adjustments (attach statement)				
c	Adjusted beginning balance (combine lines 1a and 1b)				
2	Adjustment for foreign tax redetermination				
3a	Taxes unsuspending under anti-splitter rules				
b	Taxes suspended under anti-splitter rules				
4	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l)	40,000			
5	Taxes carried over in nonrecognition transactions				
6	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i)				
7	Other adjustments (attach statement)				
8	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7)				
9	Taxes deemed paid with respect to inclusions (see instructions)	40,000			
10	Taxes deemed paid with respect to actual distributions				
11	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P				
12	Other (attach statement)				
13	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))				
14	Reserved for future use				
15	Reduction for other taxes not deemed paid				
16	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12	-0-	-0-	-0-	

**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

Schedule E (Form 5471) (Rev. 12-2021)

Name of foreign corporation Foreign Sands	EIN (if any) 00-0000046	Reference ID number (see instructions) ABC8989
a Separate Category (Enter code—see instructions.) ▶ <u> PAS </u>		
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶ _____		
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) ▶ _____		

Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued)

(e) Taxes related to previously taxed E&P (see instructions)										
	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a										
b										
c										
2										
3a										
b										
4										
5										
6										
7										
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14										
15										
16										

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1120 MeF ATS Scenario 3
Current Earnings and Profits

SCHEDULE H
(Form 5471)

(Rev. December 2021)
Department of the Treasury
Internal Revenue Service

▶ Attach to Form 5471.

OMB No. 1545-0123

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471 <u>Anywork Finance Incorporated</u>		Identifying number 00-0000003
Name of foreign corporation <u>Foreign Finance Corporation</u>	EIN (if any) 00-0000045	Reference ID number (see instructions) ABC1234

IMPORTANT: Enter the amounts on lines 1 through 5c in **functional** currency.

1	Current year net income or (loss) per foreign books of account			1	27,850,747
2	Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):	Net Additions	Net Subtractions		
a	Capital gains or losses	2a			
b	Depreciation and amortization	2b			
c	Depletion	2c			
d	Investment or incentive allowance	2d	355,647		
e	Charges to statutory reserves	2e			
f	Inventory adjustments	2f			
g	Income taxes (see Schedule E, Part I, Section 1, line 6, column (m), and Part III, line 3, column (i))	2g		113,140	
h	Foreign currency gains or losses	2h			
i	Other (attach statement)	2i	1,946,284	515,184	
3	Total net additions	3	2,301,931		
4	Total net subtractions	4		628,324	
5a	Current earnings and profits (line 1 plus line 3 minus line 4)			5a	29,524,354
b	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions)			5b	
c	Combine lines 5a and 5b and enter the result on line 5c. Then enter on lines 5c(i), 5c(ii), and 5c(iii)(A) through 5c(iii)(D) the portion of the line 5c amount with respect to the categories of income shown on those lines			5c	29,524,354
	(i) General category (enter amount on applicable Schedule J, Part I, line 3, column (a))	5c(i)	29,524,354		
	(ii) Passive category (enter amount on applicable Schedule J, Part I, line 3, column (a))	5c(ii)			
	(iii) Section 901(j) category:				
	(A) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(A) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(A)			
	(B) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(B) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(B)			
	(C) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(C) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(C)			
	(D) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(D) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(D)			
d	Current earnings and profits in U.S. dollars (line 5c translated at the average exchange rate, as defined in section 989(b)(3) and the related regulations (see instructions))			5d	43,668,620
e	Enter exchange rate used for line 5d ▶ _____				0.6761

Tax Year 2021
1120 MeF ATS Scenario 3
Current Earnings and Profits

September 9, 2021

SCHEDULE H
(Form 5471)

(Rev. December 2021)
 Department of the Treasury
 Internal Revenue Service

▶ Attach to Form 5471.

OMB No. 1545-0123

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471 <u>Anywork Finance Incorporated</u>		Identifying number <u>00-000003</u>
Name of foreign corporation <u>Foreign Sands</u>	EIN (if any) <u>00-000046</u>	Reference ID number (see instructions)

IMPORTANT: Enter the amounts on lines 1 through 5c in **functional** currency.

1	Current year net income or (loss) per foreign books of account		1	960,000
2	Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):	Net Additions	Net Subtractions	
a	Capital gains or losses	2a		
b	Depreciation and amortization	2b		
c	Depletion	2c		
d	Investment or incentive allowance	2d		
e	Charges to statutory reserves	2e		
f	Inventory adjustments	2f		
g	Income taxes (see Schedule E, Part I, Section 1, line 6, column (m), and Part III, line 3, column (i))	2g		
h	Foreign currency gains or losses	2h		
i	Other (attach statement)	2i		
3	Total net additions	3		
4	Total net subtractions	4		
5a	Current earnings and profits (line 1 plus line 3 minus line 4)		5a	960,000
b	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions)		5b	
c	Combine lines 5a and 5b and enter the result on line 5c. Then enter on lines 5c(i), 5c(ii), and 5c(iii)(A) through 5c(iii)(D) the portion of the line 5c amount with respect to the categories of income shown on those lines		5c	960,000
	(i) General category (enter amount on applicable Schedule J, Part I, line 3, column (a))	5c(i)	800,000	
	(ii) Passive category (enter amount on applicable Schedule J, Part I, line 3, column (a))	5c(ii)	160,000	
	(iii) Section 901(j) category:			
	(A) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(A) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(A)		
	(B) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(B) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(B)		
	(C) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(C) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(C)		
	(D) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(D) and on the applicable Schedule J, Part I, line 3, column (a)	5c(iii)(D)		
d	Current earnings and profits in U.S. dollars (line 5c translated at the average exchange rate, as defined in section 989(b)(3) and the related regulations (see instructions))		5d	960,000
e	Enter exchange rate used for line 5d ▶			1.000000

**SCHEDULE I-1
(Form 5471)**

Information for Global Intangible Low-Taxed Income

(Rev. December 2019)

OMB No. 1545-0704

Department of the Treasury
Internal Revenue Service

▶ **Attach to Form 5471.**

▶ **Go to www.irs.gov/Form5471 for instructions and the latest information.**

Name of person filing Form 5471 <u>Anywork Finance Incorporated</u>		Identifying number <u>00-0000003</u>
Name of foreign corporation <u>Foreign Sands</u>	EIN (if any) <u>00-0000046</u>	Reference ID number (see instructions) <u>GEN</u>
Separate Category (Enter code—see instructions.)		▶

		Functional Currency	Conversion Rate	U.S. Dollars
1 Gross income	1	2,000,000		
2 Exclusions				
a Effectively connected income	2a			
b Subpart F income	2b			
c High-tax exception income per section 954(b)(4)	2c			
d Related party dividends	2d			
e Foreign oil and gas extraction income	2e			
3 Total exclusions (total of lines 2a–2e)	3	0		
4 Gross income less total exclusions (line 1 minus line 3)	4	2,000,000		
5 Deductions properly allocable to amount on line 4	5	1,200,000		
6 Tested income (loss) (line 4 minus line 5)	6	800,000	1.0	800,000
7 Tested foreign income taxes	7	200,000	1.0	200,000
8 Qualified business asset investment (QBAI)	8	100,000	1.0	100,000
9a Interest expense included on line 5	9a			
b Qualified interest expense	9b			
c Tested loss QBAI amount	9c			
d Tested interest expense (line 9a minus the sum of line 9b and line 9c). If zero or less, enter -0-	9d			
10a Interest income included in line 4	10a			
b Qualified interest income	10b			
c Tested interest income (line 10a minus line 10b). If zero or less, enter -0-	10c			

For Paperwork Reduction Act Notice, see instructions.

Cat. No. 71400M

Schedule I-1 (Form 5471) (Rev. 12-2019)

September 9, 2021
SCHEDULE J
(Form 5471)

(Rev. December 2020)
 Department of the Treasury
 Internal Revenue Service

Tax Year 2021
1120 MeF ATS Scenario 3
Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471 <u>Anywork Finance Incorporated</u>		Identifying number <u>00-0000003</u>
Name of foreign corporation <u>Foreign Finance Corporation</u>	EIN (if any) <u>00-0000045</u>	Reference ID number (see instructions) <u>ABC1234</u>
a Separate Category (Enter code—see instructions.) b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)		▶ <u>GEN</u>

Part I Accumulated E&P of Controlled Foreign Corporation

Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).

Important: Enter amounts in functional currency.		(a) Post-2017 E&P Not Previously Taxed (post-2017 section 59(c)(3) balance)	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)			69,100,775			
b	Beginning balance adjustments (attach statement)						
c	Adjusted beginning balance (combine lines 1a and 1b)			69,100,775			
2a	Reduction for taxes unsuspending under anti-splitter rules						
b	Disallowed deduction for taxes suspended under anti-splitter rules						
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)	29,524,354					
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation						
5a	E&P carried over in nonrecognition transaction						
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction						
6	Other adjustments (attach statement)						
7	Total current and accumulated E&P (combine lines 1c through 6)	29,524,354		69,100,775			
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P	-29,524,354					
9	Actual distributions						
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P						
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)						
12	Other adjustments (attach statement)						
13	Hovering deficit offset of undistributed post-transaction E&P (see instructions)						
14	Balance at beginning of next year (combine lines 7 through 13)			69,100,775			

**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

Schedule J (Form 5471) (Rev. 12-2020)

Page **2**

Part I Accumulated E&P of Controlled Foreign Corporation <i>(continued)</i>					
(e) Previously Taxed E&P (see instructions)					
	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP
1a					
b					
c					
2a					
b					
3					
4					
5a					
b					
6					
7					
8					
9					
10					
11					
12					
13					
14					
	(viii) Section 951A PTEP	(e) Previously Taxed E&P (see instructions) (ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP	(f) Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))	
1a					69,100,775
b					
c					69,100,775
2a					
b					
3					29,524,354
4					
5a					
b					
6					
7					98,625,129
8				29,524,354	
9					
10					
11					
12					
13					
14				29,524,354	98,625,129

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DO NOT FILE

September 9, 2021

Part II Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))

Important: Enter amounts in functional currency.

1	Balance at beginning of year	▶	1	
2	Additions (amounts subject to future recapture)	▶	2	
3	Subtractions (amounts recaptured in current year)	▶	3	
4	Balance at end of year (combine lines 1 through 3)	▶	4	

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**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

**SCHEDULE J
(Form 5471)**

Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation

(Rev. December 2020)

▶ Attach to Form 5471.

OMB No. 1545-0123

Department of the Treasury
Internal Revenue Service

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

Name of person filing Form 5471 <u>Anywork Finance Incorporated</u>		Identifying number <u>00-0000003</u>
Name of foreign corporation <u>Foreign Sands</u>	EIN (if any) <u>00-0000046</u>	Reference ID number (see instructions) <u>ABC8989</u>
a Separate Category (Enter code—see instructions.) ▶ b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶		<u>GEN</u>

Part I Accumulated E&P of Controlled Foreign Corporation

Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).

		(a) Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)					3,000,000	
b	Beginning balance adjustments (attach statement)						
c	Adjusted beginning balance (combine lines 1a and 1b)					3,000,000	
2a	Reduction for taxes unsuspending under anti-splitter rules						
b	Disallowed deduction for taxes suspended under anti-splitter rules						
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)	800,000					
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation						
5a	E&P carried over in nonrecognition transaction						
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction						
6	Other adjustments (attach statement)						
7	Total current and accumulated E&P (combine lines 1c through 6)	800,000				3,000,000	
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P	-700,000					
9	Actual distributions					-3,000,000	
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P						
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)						
12	Other adjustments (attach statement)						
13	Hovering deficit offset of undistributed post-transaction E&P (see instructions)						
14	Balance at beginning of next year (combine lines 7 through 13)	100,000				0	

**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

Schedule J (Form 5471) (Rev. 12-2020)

Part I Accumulated E&P of Controlled Foreign Corporation <i>(continued)</i>					
(e) Previously Taxed E&P (see instructions)					
	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP
1a					500,000
b					
c					500,000
2a					
b					
3					
4					
5a					
b					
6					
7					500,000
8					
9					-500,000
10					
11					
12					
13					
14					0
(e) Previously Taxed E&P (see instructions)					(f)
	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP	Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))	
1a					3,500,000
b					
c					3,500,000
2a					
b					
3					800,000
4					
5a					
b					
6					
7					4,300,000
8		700,000			
9					-3,500,000
10					
11					
12					
13					
14		700,000			800,000

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September 9, 2021

Part II Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))

Important: Enter amounts in functional currency.

1	Balance at beginning of year	▶	1	
2	Additions (amounts subject to future recapture)	▶	2	
3	Subtractions (amounts recaptured in current year)	▶	3	
4	Balance at end of year (combine lines 1 through 3)	▶	4	

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September 9, 2021
SCHEDULE J
(Form 5471)

(Rev. December 2020)
 Department of the Treasury
 Internal Revenue Service

Tax Year 2021
1120 MeF ATS Scenario 3
Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation

▶ Attach to Form 5471.

▶ Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471 <u>Anywork Finance Incorporated</u>		Identifying number <u>00-0000003</u>
Name of foreign corporation <u>Foreign Sands</u>	EIN (if any) <u>00-0000046</u>	Reference ID number (see instructions) <u>ABC8989</u>
a Separate Category (Enter code—see instructions.) ▶ b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶		<u>PAS</u>

Part I Accumulated E&P of Controlled Foreign Corporation

Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).

Important: Enter amounts in functional currency.		(a) Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)						
b	Beginning balance adjustments (attach statement)						
c	Adjusted beginning balance (combine lines 1a and 1b)						
2a	Reduction for taxes unsuspending under anti-splitter rules						
b	Disallowed deduction for taxes suspended under anti-splitter rules						
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)	160,000					
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation						
5a	E&P carried over in nonrecognition transaction						
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction						
6	Other adjustments (attach statement)						
7	Total current and accumulated E&P (combine lines 1c through 6)	160,000					
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P	-160,000					
9	Actual distributions						
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P						
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)						
12	Other adjustments (attach statement)						
13	Hovering deficit offset of undistributed post-transaction E&P (see instructions)						
14	Balance at beginning of next year (combine lines 7 through 13)	0					

**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

Schedule J (Form 5471) (Rev. 12-2020)

Page **2**

Part I Accumulated E&P of Controlled Foreign Corporation (continued)

(e) Previously Taxed E&P (see instructions)					
	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP
1a					
b					
c					
2a					
b					
3					
4					
5a					
b					
6					
7					
8					
9					
10					
11					
12					
13					
14					
(e) Previously Taxed E&P (see instructions)				(f) Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))	
	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP		
1a					
b					
c					
2a					
b					
3					160,000
4					
5a					
b					
6					
7					160,000
8				160,000	
9					
10					
11					
12					
13					
14				160,000	160,000

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August 24, 2020
DO NOT FILE

September 9, 2021

Part II Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))

Important: Enter amounts in functional currency.

1	Balance at beginning of year	▶	1	
2	Additions (amounts subject to future recapture)	▶	2	
3	Subtractions (amounts recaptured in current year)	▶	3	
4	Balance at end of year (combine lines 1 through 3)	▶	4	

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August 24, 2020
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September 9, 2021

1120 MeF ATS Scenario 3

SCHEDULE M (Form 5471)

Transactions Between Controlled Foreign Corporation and Shareholders or Other Related Persons

OMB No. 1545-0123

(Rev. December 2021) Department of the Treasury Internal Revenue Service

Attach to Form 5471.

Go to www.irs.gov/Form5471 for instructions and the latest information.

Table with identifying information: Name of person filing Form 5471 (Anywork Finance Incorporated), Name of foreign corporation (Foreign Finance, Incorporated), EIN (if any) (00-000045), Identifying number (00-000003), Reference ID number (ABC1234).

Important: Complete a separate Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during the annual accounting period between the foreign corporation and the persons listed in columns (b) through (f). All amounts must be stated in U.S. dollars translated from functional currency at the average exchange rate for the foreign corporation's tax year. See instructions.

Enter the relevant functional currency and the exchange rate used throughout this schedule British Pound .6761

Main transaction table with columns: (a) Transactions of foreign corporation, (b) U.S. person filing this return, (c) Any domestic corporation or partnership controlled by U.S. person filing this return, (d) Any other foreign corporation or partnership controlled by U.S. person filing this return, (e) 10% or more U.S. shareholder of controlled foreign corporation, (f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation. Rows include sales, purchases, compensation, dividends, interest, etc.

INTERNAL USE ONLY DRAFT AS OF May 6, 2021

September 9, 2021

1120 MeF ATS Scenario 3

Schedule M (Form 5471) (Rev. 12-2021)

Page 2

Name of person filing Form 5471					Identifying number	
(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation	
31 Accounts Payable						
32 Amounts borrowed (enter the maximum loan balance during the year)—see instructions						
33 Accounts Receivable						
34 Amounts loaned (enter the maximum loan balance during the year)—see instructions	46,001,741					

Schedule M (Form 5471) (Rev. 12-2021)

INTERNAL USE ONLY
DRAFT AS OF
May 6, 2021

September 9, 2021

1120 MeF ATS Scenario 3

**SCHEDULE O
(Form 5471)**

Organization or Reorganization of Foreign Corporation, and Acquisitions and Dispositions of its Stock

OMB No. 1545-0704

(Rev. December 2012)
Department of the Treasury
Internal Revenue Service

Information about Schedule O (Form 5471) and its instructions is at www.irs.gov/form5471
▶ Attach to Form 5471.

Name of person filing Form 5471 <u>Anywork Finance, Incorporated</u>		Identifying number <u>00-0000003</u>
Name of foreign corporation <u>Foreign Finance Corporation</u>	EIN (if any) <u>00-0000045</u>	Reference ID number (see instructions) <u>ABC1234</u>

Important: Complete a *separate* Schedule O for each foreign corporation for which information must be reported.

Part I To Be Completed by U.S. Officers and Directors

(a) Name of shareholder for whom acquisition information is reported	(b) Address of shareholder	(c) Identifying number of shareholder	(d) Date of original 10% acquisition	(e) Date of additional 10% acquisition
<u>Anywork Finance, Incorporated</u>	<u>35 Any St., Anytown, NY10006</u>	<u>00-0000003</u>	<u>01/10/1990</u>	

Part II To Be Completed by U.S. Shareholders

Note: If this return is required because one or more shareholders became U.S. persons, attach a list showing the names of such persons and the date each became a U.S. person.

Section A—General Shareholder Information

(a) Name, address, and identifying number of shareholder(s) filing this schedule	(b) For shareholder's latest U.S. income tax return filed, indicate:			(c) Date (if any) shareholder last filed information return under section 6046 for the foreign corporation
	(1) Type of return (enter form number)	(2) Date return filed	(3) Internal Revenue Service Center where filed	
<u>Anywork Finance, Incorporated</u>	<u>1120</u>	<u>09/15/2019</u>	<u>Ogden</u>	

Section B—U.S. Persons Who Are Officers or Directors of the Foreign Corporation

(a) Name of U.S. officer or director	(b) Address	(c) Social security number	(d) Check appropriate box(es)	
			Officer	Director

Section C—Acquisition of Stock

(a) Name of shareholder(s) filing this schedule	(b) Class of stock acquired	(c) Date of acquisition	(d) Method of acquisition	(e) Number of shares acquired		
				(1) Directly	(2) Indirectly	(3) Constructively
<u>Anywork Finance, Incorporated</u>	<u>Common</u>	<u>12/31/2019</u>	<u>Purchase</u>	<u>250</u>		
<u>Anywork Finance, Incorporated</u>	<u>Preferred</u>	<u>12/31/2019</u>	<u>Purchase</u>	<u>64,570</u>		

(f) Amount paid or value given	(g) Name and address of person from whom shares were acquired
9,000,000	Mary Doe, 812 Maple Street, Somewhere, MD 20901

Section D—Disposition of Stock

(a) Name of shareholder disposing of stock	(b) Class of stock	(c) Date of disposition	(d) Method of disposition	(e) Number of shares disposed of		
				(1) Directly	(2) Indirectly	(3) Constructively

(f) Amount received	(g) Name and address of person to whom disposition of stock was made

Section E—Organization or Reorganization of Foreign Corporation

(a) Name and address of transferor	(b) Identifying number (if any)	(c) Date of transfer

(d) Assets transferred to foreign corporation			(e) Description of assets transferred by, or notes or securities issued by, foreign corporation
(1) Description of assets	(2) Fair market value	(3) Adjusted basis (if transferor was U.S. person)	

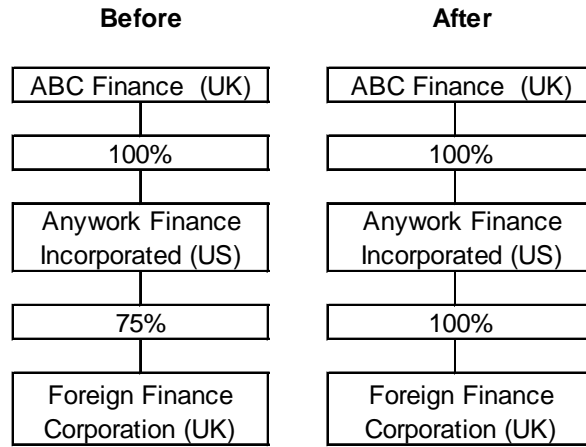
Section F—Additional Information

(a) If the foreign corporation or a predecessor U.S. corporation filed (or joined with a consolidated group in filing) a U.S. income tax return for any of the last 3 years, attach a statement indicating the year for which a return was filed (and, if applicable, the name of the corporation filing the consolidated return), the taxable income or loss, and the U.S. income tax paid (after all credits).

(b) List the date of any reorganization of the foreign corporation that occurred during the last 4 years while any U.S. person held 10% or more in value or vote (directly or indirectly) of the corporation's stock ►

(c) If the foreign corporation is a member of a group constituting a chain of ownership, attach a chart, for each unit of which a shareholder owns 10% or more in value or voting power of the outstanding stock. The chart must indicate the corporation's position in the chain of ownership and the percentages of stock ownership (see instructions for an example).

Anywork Finance Incorporated 00-0000003
F5471, Schedule O, Section F (C)
Additional Information, Organizational Chart



Tax Year 2021

September 9, 2021

1120 MeF ATS Scenario 3

Form **5472**

Information Return of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business (Under Sections 6038A and 6038C of the Internal Revenue Code)

(Rev. December 2018)

OMB No. 1545-0123

Go to www.irs.gov/Form5472 for instructions and the latest information.

Department of the Treasury Internal Revenue Service For tax year of the reporting corporation beginning 01/01, 2021, and ending 12/31, 2021

Note: Enter all information in English and money items in U.S. dollars.

Part I Reporting Corporation (see instructions). All reporting corporations must complete Part I.

1a Name of reporting corporation <u>Anywork Finance Incorporated</u> Number, street, and room or suite no. (if a P.O. box, see instructions)		1b Employer identification number <u>00-0000003</u>	
35 <u>Any Street</u> City or town, state, and ZIP code (if a foreign address, see instructions)		1c Total assets \$ <u>250,306,361</u>	
1d Principal business activity ▶ <u>International Finance</u>		1e Principal business activity code ▶ <u>522293</u>	
1f Total value of gross payments made or received reported on this Form 5472. See instructions. \$ <u>5,000</u>	1g Total number of Forms 5472 filed for the tax year <u>1</u>	1h Total value of gross payments made or received reported on all Forms 5472. See instructions. \$ <u>5,000</u>	
1i Check here if this is a consolidated filing of Form 5472 <input type="checkbox"/>	1j Check here if this is the initial year for which the U.S. reporting corporation is filing a Form 5472 . . . <input type="checkbox"/>	1k Country of incorporation <u>US</u>	
1l Country(ies) under whose laws the reporting corporation files an income tax return as a resident <u>US</u>		1m Principal country(ies) where business is conducted <u>US</u>	
2 Check here if, at any time during the tax year, any foreign person owned, directly or indirectly, at least 50% of (a) the total voting power of all classes of the stock of the reporting corporation entitled to vote, or (b) the total value of all classes of stock of the reporting corporation ▶ <input checked="" type="checkbox"/>			
3 Check here if the reporting corporation is a foreign-owned domestic disregarded entity (foreign-owned U.S. DE) treated as a corporation for purposes of section 6038A. See instructions ▶ <input type="checkbox"/>			

Part II 25% Foreign Shareholder (see instructions)
Check here if any direct (or ultimate indirect) 25% foreign shareholder listed in Part II is a surrogate foreign corporation under section 7874(a)(2)(B). ▶

1a Name and address of direct 25% foreign shareholder <u>ABC Finance Corporation, 13 Somewhere, Birmingham, England 126375</u>		
1b(1) U.S. identifying number, if any <u>00-0000021</u>	1b(2) Reference ID number (see instructions)	1b(3) Foreign taxpayer identification number (FTIN), if any (see instructions)
1c Principal country(ies) where business is conducted <u>UK</u>	1d Country of citizenship, organization, or incorporation <u>UK</u>	1e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident <u>UK</u>
2a Name and address of direct 25% foreign shareholder		
2b(1) U.S. identifying number, if any	2b(2) Reference ID number (see instructions)	2b(3) FTIN, if any (see instructions)
2c Principal country(ies) where business is conducted	2d Country of citizenship, organization, or incorporation	2e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident
3a Name and address of ultimate indirect 25% foreign shareholder		
3b(1) U.S. identifying number, if any	3b(2) Reference ID number (see instructions)	3b(3) FTIN, if any (see instructions)
3c Principal country(ies) where business is conducted	3d Country of citizenship, organization, or incorporation	3e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident
4a Name and address of ultimate indirect 25% foreign shareholder		
4b(1) U.S. identifying number, if any	4b(2) Reference ID number (see instructions)	4b(3) FTIN, if any (see instructions)
4c Principal country(ies) where business is conducted	4d Country of citizenship, organization, or incorporation	4e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident

Part III Related Party (see instructions). All reporting corporations must complete this question and the rest of Part III.

Check applicable box: Is the related party a [X] foreign person or [] U.S. person?

1a Name and address of related party

ABC Finance 13 Somewhere, Birmingham, England 126375

Table with 3 columns: 1b(1) U.S. identifying number, if any; 1b(2) Reference ID number; 1b(3) FTIN, if any.

1c Principal business activity: International Finance; 1d Principal business activity code: 522293

1e Relationship—Check boxes that apply: [] Related to reporting corporation [] Related to 25% foreign shareholder [X] 25% foreign shareholder

1f Principal country(ies) where business is conducted: UK; 1g Country(ies) under whose laws the related party files an income tax return as a resident: UK

Part IV Monetary Transactions Between Reporting Corporations and Foreign Related Party (see instructions)

Caution: Part IV must be completed if the "foreign person" box is checked in the heading for Part III.

If estimates are used, check here. []

Table with 26 rows for monetary transactions (Sales, Purchases, Rents, etc.) and columns for amounts received and paid.

Part V Reportable Transactions of a Reporting Corporation That is a Foreign-Owned U.S. DE (see instructions)

Describe on an attached separate sheet any other transaction as defined by Regulations section 1.482-1(i)(7), such as amounts paid or received in connection with the formation, dissolution, acquisition, and disposition of the entity, including contributions to and distributions from the entity, and check here. []

Part VI Nonmonetary and Less-Than-Full Consideration Transactions Between the Reporting Corporation and the Foreign Related Party (see instructions)

Describe these transactions on an attached separate sheet and check here. []

Part VII Additional Information. All reporting corporations must complete Part VII.

- 1 Does the reporting corporation import goods from a foreign related party?
2a If "Yes," is the basis or inventory cost of the goods valued at greater than the customs value of the imported goods?
b If "Yes," attach a statement explaining the reason or reasons for such difference.
c If the answers to questions 1 and 2a are "Yes," were the documents used to support this treatment of the imported goods in existence and available in the United States at the time of filing Form 5472?
3 During the tax year, was the foreign parent corporation a participant in any cost-sharing arrangement?
4 During the course of the tax year, did the foreign parent corporation become a participant in any cost-sharing arrangement?
5a During the tax year, did the reporting corporation pay or accrue any interest or royalty, to the related party, for which the deduction is not allowed under section 267A? See instructions
b If "Yes," enter the total amount of the disallowed deductions
6a Does the reporting corporation claim a foreign-derived intangible income (FDII) deduction (under section 250) with respect to amounts listed in Part IV?
b If "Yes," enter the amount of gross income derived from sales, leases, exchanges, or other dispositions (but not licenses) of property to the foreign related party that the reporting corporation included in its computation of foreign-derived deduction eligible income (FDDEI). See instructions
c If "Yes," enter the amount of gross income derived from a license of property to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions.
d If "Yes," enter the amount of gross income derived from services provided to the foreign related party that the reporting corporation included in its computation of FDDEI. See instructions

Part VIII Base Erosion Payments and Base Erosion Tax Benefits Under Section 59A (see instructions)

- 1 Amounts defined as base erosion payments under section 59A(d)
2 Amount of base erosion tax benefits under section 59A(c)(2)
3 Amount of total qualified derivative payments as described in section 59A(h) made by the reporting corporation
4 Reserved for future use

Entity Classification Election

Department of the Treasury
Internal Revenue Service

► Information about Form 8832 and its instructions is at www.irs.gov/form8832.

Type or Print	Name of eligible entity making election <u>DEF International Finance</u>	Employer identification number <u>00-000017</u>
	Number, street, and room or suite no. If a P.O. box, see instructions. <u>1000 Helmstraat</u>	
	City or town, state, and ZIP code. If a foreign address, enter city, province or state, postal code and country. Follow the country's practice for entering the postal code. <u>Maastricht, Limburg, Netherlands 6211TA</u>	

- Check if: Address change Late classification relief sought under Revenue Procedure 2009-41
 Relief for a late change of entity classification election sought under Revenue Procedure 2010-32

Part I Election Information

1 Type of election (see instructions):

- a** Initial classification by a newly-formed entity. Skip lines 2a and 2b and go to line 3.
- b** Change in current classification. Go to line 2a.

2a Has the eligible entity previously filed an entity election that had an effective date within the last 60 months?

- Yes.** Go to line 2b.
- No.** Skip line 2b and go to line 3.

2b Was the eligible entity's prior election an initial classification election by a newly formed entity that was effective on the date of formation?

- Yes.** Go to line 3.
- No.** Stop here. You generally are not currently eligible to make the election (see instructions).

3 Does the eligible entity have more than one owner?

- Yes.** You can elect to be classified as a partnership or an association taxable as a corporation. Skip line 4 and go to line 5.
- No.** You can elect to be classified as an association taxable as a corporation or to be disregarded as a separate entity. Go to line 4.

4 If the eligible entity has only one owner, provide the following information:

- a** Name of owner ► Anywork Finance Incorporated
- b** Identifying number of owner ► 00-000003

5 If the eligible entity is owned by one or more affiliated corporations that file a consolidated return, provide the name and employer identification number of the parent corporation:

- a** Name of parent corporation ► _____
- b** Employer identification number ► _____

Part I Election Information (Continued)

6 Type of entity (see instructions):

- a A domestic eligible entity electing to be classified as an association taxable as a corporation.
b A domestic eligible entity electing to be classified as a partnership.
c A domestic eligible entity with a single owner electing to be disregarded as a separate entity.
d A foreign eligible entity electing to be classified as an association taxable as a corporation.
e A foreign eligible entity electing to be classified as a partnership.
f A foreign eligible entity with a single owner electing to be disregarded as a separate entity.

7 If the eligible entity is created or organized in a foreign jurisdiction, provide the foreign country of organization Netherlands

8 Election is to be effective beginning (month, day, year) (see instructions) 12/31/2019

9 Name and title of contact person whom the IRS may call for more information Sam Brown, Tax Administrator
10 Contact person's telephone number 515-555-5550

Consent Statement and Signature(s) (see instructions)

Under penalties of perjury, I (we) declare that I (we) consent to the election of the above-named entity to be classified as indicated above, and that I (we) have examined this election and consent statement, and to the best of my (our) knowledge and belief, this election and consent statement are true, correct, and complete. If I am an officer, manager, or member signing for the entity, I further declare under penalties of perjury that I am authorized to make the election on its behalf.

Table with 3 columns: Signature(s), Date, Title. The table is currently empty.

Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs)

(Rev. September 2020)

► Go to www.irs.gov/Form8858 for instructions and the latest information.

Department of the Treasury
Internal Revenue Service

Information furnished for the FDE's or FB's annual accounting period (see instructions) beginning 01/01, 20 21, and ending 12/31, 20 21

Attachment Sequence No. **140**

Name of person filing this return Anywork Finance Incorporated Filer's identifying number 00-0000003

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address) 35 Any Street

City or town, state, and ZIP code Anytown, NY 10006

Filer's tax year beginning _____, 20____, and ending _____, 20____

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

Check here FDE of a U.S. person FDE of a controlled foreign corporation (CFC) FDE of a controlled foreign partnership
 FB of a U.S. person FB of a CFC FB of a controlled foreign partnership

Check here Initial 8858 Final 8858

1a Name and address of FDE or FB DEF International Finance
1000 Helmstraat
Maastricht, Limburg/Netherlands 6211TA **b(1)** U.S. identifying number, if any 00-0000017
b(2) Reference ID number (see instructions)

c For FDE, country(ies) under whose laws organized and entity type under local tax law Netherlands Foreign Entity **d** Date(s) of organization 12/30/2020 **e** Effective date as FDE 12/31/2020

f If benefits under a U.S. tax treaty were claimed with respect to income of the FDE or FB, enter the treaty and article number **g** Country in which principal business activity is conducted **h** Principal business activity **i** Functional currency

2 Provide the following information for the FDE's or FB's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States **b** Name and address (including corporate department, if applicable) of person(s) with custody of the books and records of the FDE or FB, and the location of such books and records, if different

3 For the **tax owner** of the FDE or FB (if different from the filer), provide the following (see instructions):

a Name and address ABCDEF Finance Corporation
14 Somewhere
Birmingham, England 126375 **b** Annual accounting period covered by the return (see instructions)
c(1) U.S. identifying number, if any 00-0000022
c(2) Reference ID number (see instructions)
d Country under whose laws organized **e** Functional currency

4 For the **direct owner** of the FDE or FB (if different from the tax owner), provide the following (see instructions):

a Name and address **b** Country under whose laws organized
c U.S. identifying number, if any **d** Functional currency

5 Attach an organizational chart that identifies the name, placement, percentage of ownership, tax classification, and country of organization of all entities in the chain of ownership between the tax owner and the FDE or FB, and the chain of ownership between the FDE or FB and each entity in which the FDE or FB has a 10% or more direct or indirect interest. See instructions.

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. GAAP. Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules or the average exchange rate determined under section 989(b)). If the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for FDEs or FBs that use DASTM.

If you are using the average exchange rate (determined under section 989(b)), check the following box

		Functional Currency	U.S. Dollar
1 Gross receipts or sales (net of returns and allowances)	1		
2 Cost of goods sold	2		
3 Gross profit (subtract line 2 from line 1)	3		
4 Dividends	4		
5 Interest	5		
6 Gross rents, royalties, and license fees	6		
7 Gross income from performance of services	7		
8 Foreign currency gain (loss)	8		
9 Other income	9		
10 Total income (add lines 3 through 9)	10		
11 Total deductions (exclude income tax expense)	11		
12 Income tax expense	12		
13 Other adjustments	13		
14 Net income (loss) per books	14		

Schedule C-1 Section 987 Gain or Loss Information

Note: See the instructions if there are multiple recipients of remittances from the FDE or FB.

	(a) Amount stated in functional currency of FDE or FB	(b) Amount stated in functional currency of recipient	
1 Remittances from the FDE or FB	1		
2 Section 987 gain (loss) recognized by recipient	2		
3 Section 987 gain (loss) deferred under Regulations section 1.987-12 (attach statement)	3		
		Yes	No
4 Were all remittances from the FDE or FB treated as made to the direct owner?		✓	
5 Did the tax owner change its method of accounting for section 987 gain or loss with respect to remittances from the FDE or FB during the tax year? If "Yes," attach a statement describing the method used prior to the change and new method of accounting			✓

Schedule F Balance Sheet

Important: Report all amounts in U.S. dollars computed in functional currency and translated into U.S. dollars in accordance with U.S. GAAP. See instructions for an exception for FDEs or FBs that use DASTM.

	(a) Beginning of annual accounting period	(b) End of annual accounting period
Assets		
1 Cash and other current assets	1	
2 Other assets	2	
3 Total assets	3	
Liabilities and Owner's Equity		
4 Liabilities	4	
5 Owner's equity	5	
6 Total liabilities and owner's equity	6	

Schedule G Other Information

		Yes	No
1 During the tax year, did the FDE or FB own an interest in any trust?	1		✓
2 During the tax year, did the FDE or FB own at least a 10% interest, directly or indirectly, in any foreign partnership?	2		✓
3 Answer the following question only if the FDE made its election to be treated as disregarded from its owner during the tax year: Did the tax owner claim a loss with respect to stock or debt of the FDE as a result of the election?	3		
4 During the tax year, did the FDE or FB pay or accrue any foreign tax that was disqualified for credit under section 901(m)?	4		✓
5 During the tax year, did the FDE or FB pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended?	5		✓

Schedule G Other Information (continued)

Table with 3 columns: Question, Yes, No. Contains questions 6a through 13a regarding base erosion payments, dual consolidated losses, and recapture events.

Schedule H Current Earnings and Profits or Taxable Income (see instructions)

Important: Enter the amounts on lines 1 through 6 in functional currency.

1	Current year net income (loss) per foreign books of account	1	
2	Total net additions	2	
3	Total net subtractions	3	
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	6	
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))	7	
8	Enter exchange rate used for line 7 ▶		

Schedule I Transferred Loss Amount (see instructions)

Important: See instructions for who has to complete this section.

	Yes	No
1		✓
2		
3		
4	Enter the transferred loss amount included in gross income as required under section 91. See instructions	
	4	

Schedule J Income Taxes Paid or Accrued (see instructions)

(a) Country or Possession	Foreign Income Taxes			Foreign Tax Credit Separate Categories			
	(b) Foreign Currency	(c) Conversion Rate	(d) U.S. Dollars	(e) Foreign Branch	(f) Passive	(g) General	(h) Other
Totals							

Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs)

(Rev. September 2020)

▶ Go to www.irs.gov/Form8858 for instructions and the latest information.

Department of the Treasury
Internal Revenue Service

Information furnished for the FDE's or FB's annual accounting period (see instructions) beginning 01/01, 20 21, and ending 12/31, 20 21

Attachment Sequence No. **140**

Name of person filing this return Anywork Finance Incorporated Filer's identifying number 00-0000003

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address) 35 Any Street

City or town, state, and ZIP code Anytown, NY 10006

Filer's tax year beginning _____, 20____, and ending _____, 20____

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

Check here FDE of a U.S. person FDE of a controlled foreign corporation (CFC) FDE of a controlled foreign partnership
 FB of a U.S. person FB of a CFC FB of a controlled foreign partnership

Check here Initial 8858 Final 8858

1a Name and address of FDE or FB GHI International Finance
2000 Helmstraat
Maastricht, Limburg/Netherlands 6211TA **b(1)** U.S. identifying number, if any 00-0000018
b(2) Reference ID number (see instructions)

c For FDE, country(ies) under whose laws organized and entity type under local tax law Netherlands Foreign Entity **d** Date(s) of organization 12/30/2020 **e** Effective date as FDE 12/31/2020

f If benefits under a U.S. tax treaty were claimed with respect to income of the FDE or FB, enter the treaty and article number **g** Country in which principal business activity is conducted **h** Principal business activity **i** Functional currency

2 Provide the following information for the FDE's or FB's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States **b** Name and address (including corporate department, if applicable) of person(s) with custody of the books and records of the FDE or FB, and the location of such books and records, if different

3 For the **tax owner** of the FDE or FB (if different from the filer), provide the following (see instructions):

a Name and address **b** Annual accounting period covered by the return (see instructions)
c(1) U.S. identifying number, if any
c(2) Reference ID number (see instructions)
d Country under whose laws organized **e** Functional currency

4 For the **direct owner** of the FDE or FB (if different from the tax owner), provide the following (see instructions):

a Name and address **b** Country under whose laws organized
c U.S. identifying number, if any **d** Functional currency

5 Attach an organizational chart that identifies the name, placement, percentage of ownership, tax classification, and country of organization of all entities in the chain of ownership between the tax owner and the FDE or FB, and the chain of ownership between the FDE or FB and each entity in which the FDE or FB has a 10% or more direct or indirect interest. See instructions.

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. GAAP. Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules or the average exchange rate determined under section 989(b)). If the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for FDEs or FBs that use DASTM.

If you are using the average exchange rate (determined under section 989(b)), check the following box

	Functional Currency	U.S. Dollar
1 Gross receipts or sales (net of returns and allowances)	1,000,000	1,000,000
2 Cost of goods sold	800,000	800,000
3 Gross profit (subtract line 2 from line 1)	200,000	200,000
4 Dividends		
5 Interest		
6 Gross rents, royalties, and license fees		
7 Gross income from performance of services	100,000	100,000
8 Foreign currency gain (loss)		
9 Other income		
10 Total income (add lines 3 through 9)	300,000	300,000
11 Total deductions (exclude income tax expense)	200,000	200,000
12 Income tax expense	20,000	20,000
13 Other adjustments		
14 Net income (loss) per books	80,000	80,000

Schedule C-1 Section 987 Gain or Loss Information

Note: See the instructions if there are multiple recipients of remittances from the FDE or FB.

	(a) Amount stated in functional currency of FDE or FB	(b) Amount stated in functional currency of recipient
1 Remittances from the FDE or FB		
2 Section 987 gain (loss) recognized by recipient		
3 Section 987 gain (loss) deferred under Regulations section 1.987-12 (attach statement)		
4 Were all remittances from the FDE or FB treated as made to the direct owner?	Yes	No
5 Did the tax owner change its method of accounting for section 987 gain or loss with respect to remittances from the FDE or FB during the tax year? If "Yes," attach a statement describing the method used prior to the change and new method of accounting	✓	✓

Schedule F Balance Sheet

Important: Report all amounts in U.S. dollars computed in functional currency and translated into U.S. dollars in accordance with U.S. GAAP. See instructions for an exception for FDEs or FBs that use DASTM.

	(a) Beginning of annual accounting period	(b) End of annual accounting period
Assets		
1 Cash and other current assets		
2 Other assets		
3 Total assets		
Liabilities and Owner's Equity		
4 Liabilities		
5 Owner's equity		
6 Total liabilities and owner's equity		

Schedule G Other Information

	Yes	No
1 During the tax year, did the FDE or FB own an interest in any trust?		✓
2 During the tax year, did the FDE or FB own at least a 10% interest, directly or indirectly, in any foreign partnership?		✓
3 Answer the following question only if the FDE made its election to be treated as disregarded from its owner during the tax year: Did the tax owner claim a loss with respect to stock or debt of the FDE as a result of the election?		
4 During the tax year, did the FDE or FB pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		✓
5 During the tax year, did the FDE or FB pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended?		✓

Schedule G Other Information (continued)

Table with 3 columns: Question, Yes, No. Contains questions 6a through 13a regarding base erosion payments, dual consolidated losses, and recapture events.

Schedule H Current Earnings and Profits or Taxable Income (see instructions)

Important: Enter the amounts on lines 1 through 6 in functional currency.

1	Current year net income (loss) per foreign books of account	1	80,000
2	Total net additions	2	
3	Total net subtractions	3	
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	6	
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))	7	80,000
8	Enter exchange rate used for line 7 ▶		

Schedule I Transferred Loss Amount (see instructions)

Important: See instructions for who has to complete this section.

	Yes	No
1		
2		
3		
4		

Schedule J Income Taxes Paid or Accrued (see instructions)

(a) Country or Possession	Foreign Income Taxes			Foreign Tax Credit Separate Categories			
	(b) Foreign Currency	(c) Conversion Rate	(d) U.S. Dollars	(e) Foreign Branch	(f) Passive	(g) General	(h) Other
NL				20,000			
Totals							

U.S. Shareholder Calculation of Global Intangible Low-Taxed Income (GILTI)

Form **8992**
(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

► Go to www.irs.gov/Form8992 for instructions and the latest information.

Attachment
Sequence No. **992**

Name of person filing this return <u>Anywork Finance Incorporated</u>	A Identifying number 00-0000003
Name of U.S. shareholder	B Identifying number

Part I Net Controlled Foreign Corporation (CFC) Tested Income

1 Sum of Pro Rata Share of Net Tested Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Form 8992, Schedule A, line 1, column (e). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (c), that pertains to the U.S. shareholder.	1	800,000
2 Sum of Pro Rata Share of Net Tested Loss If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Form 8992, Schedule A, line 1, column (f). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (f), that pertains to the U.S. shareholder.	2	()
3 Net CFC Tested Income. Combine lines 1 and 2. If zero or less, stop here	3	800,000

Part II Calculation of Global Intangible Low-Taxed Income (GILTI)

1 Net CFC Tested Income. Enter amount from Part I, line 3	1	800,000
2 Deemed Tangible Income Return (DTIR) If the U.S. shareholder is not a member of a U.S. consolidated group, multiply the total from Form 8992, Schedule A, line 1, column (g), by 10% (0.10). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (i), that pertains to the U.S. shareholder.	2	100,000
3a Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Form 8992, Schedule A, line 1, column (j). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3a blank.	3a	
b Sum of Pro Rata Share of Tested Interest Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Form 8992, Schedule A, line 1, column (i). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3b blank.	3b	
c Specified Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0-. If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder.	3c	0
4 Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0-	4	100,000
5 GILTI. Subtract line 4 from line 1	5	700,000

**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

Form 8992 (Rev. 12-2020)

Page **2**

Schedule A Schedule A for U.S. Shareholder Calculation of Global Intangible Low-Taxed Income (GILTI)

Name of person filing this form

Anywork Finance Incorporated

A Identifying number

00-000003

Name of U.S. shareholder

B Identifying number

(a) Name of CFC	(b) EIN or Reference ID	Calculations for Net Tested Income ^e (see instructions)								GILTI Allocated to Tested Income CFCs (see instructions)	
		(c) Tested Income	(d) Tested Loss	(e) Pro Rata Share of Tested Income	(f) Pro Rata Share of Tested Loss	(g) Pro Rata Share of Qualified Business Asset Investment (QBAI)	(h) Pro Rata Share of Tested Loss QBAI Amount	(i) Pro Rata Share of Tested Interest Income	(j) Pro Rata Share of Tested Interest Expense	(k) GILTI Allocation Ratio (Divide Col. (e) by Line 1 Total)	(l) GILTI Allocated to Tested Income CFCs (Multiply Form 8992, Part II, Line 5, by Col. (k))
NL		800,000	()	800,000	()	1,000,000	()			1.0000	700,000
		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
1. Totals (see instructions)		800,000	()	800,000	()	1,000,000	()			1.0000	700,000

Totals on line 1 should include the totals from any continuation sheets.

**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

Form 8992 (Rev. 12-2020)

Schedule A—Continuation Sheet. *Use only if you need additional space.*

Name of person filing this form <u>Anywork Finance Incorporated</u>	A Identifying number <p align="center">00-000003</p>
Name of U.S. shareholder	B Identifying number

(a) Name of CFC	(b) EIN or Reference ID	Calculations for Net Tested Income (see instructions)								GILTI Allocated to Tested Income CFCs (see instructions)	
		(c) Tested Income	(d) Tested Loss	(e) Pro Rata Share of Tested Income	(f) Pro Rata Share of Tested Loss	(g) Pro Rata Share of Qualified Business Asset Investment (QBAI)	(h) Pro Rata Share of Tested Loss QBAI Amount	(i) Pro Rata Share of Tested Interest Income	(j) Pro Rata Share of Tested Interest Expense	(k) GILTI Allocation Ratio (Divide Col. (e) by Line 1 Total)	(l) GILTI Allocated to Tested Income CFCs (Multiply Form 8992, Part II, Line 5, by Col. (k))
		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
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		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
		()	()		()		()				
1. Totals (see instructions) . . .		()	()		()		()				

Totals of columns (c) through (l) should be included on line 1 Totals on page 2.

**Tax Year 2021
1120 MeF ATS Scenario 3**

September 9, 2021

Form 8992 (Rev. 12-2020)

Page **4**

Schedule A—Continuation Sheet. Use only if you need additional space.

Name of person filing this form <u>Anywork Finance Incorporated</u>	A Identifying number <p align="right">00-0000003</p>
Name of U.S. shareholder	B Identifying number

(a) Name of CFC	(b) EIN or Reference ID	Calculations for Net Tested Income (see instructions)								GILTI Allocated to Tested Income CFCs (see instructions)	
		(c) Tested Income	(d) Tested Loss	(e) Pro Rata Share of Tested Income	(f) Pro Rata Share of Tested Loss	(g) Pro Rata Share of Qualified Business Asset Investment (QBAI)	(h) Pro Rata Share of Tested Loss QBAI Amount	(i) Pro Rata Share of Tested Interest Income	(j) Pro Rata Share of Tested Interest Expense	(k) GILTI Allocation Ratio (Divide Col. (e) by Line 1 Total)	(l) GILTI Allocated to Tested Income CFCs (Multiply Form 8992, Part II, Line 5, by Col. (k))
1. Totals (see instructions) . . .											

Totals of columns (c) through (l) should be included on line 1 Totals on page 2.

Section 250 Deduction for Foreign-Derived Intangible Income (FDII) and Global Intangible Low-Taxed Income (GILTI)

Go to www.irs.gov/Form8993 for instructions and the latest information.

Name of person filing this return

Identifying number

Anywork Finance Incorporated

00-0000003

Part I Determining Deduction Eligible Income (DEI) (see instructions)

Table with 6 main rows and sub-rows (a-f) for exclusions. Includes Gross Income, Exclusions, Total Exclusions, and Deduction Eligible Income (DEI).

Part II Determining Deemed Intangible Income (DII) (see instructions)

Table with 3 rows: 1 DEI (from Part I, line 6), 2 Deemed Tangible Income Return (10% of QBAI), 3 Deemed Intangible Income (DII).

Part III Determining Foreign Derived Ratio (see instructions)

Table with 4 rows: 1a-1c DEI derived from sales, leases, exchanges, or other dispositions; 2 Foreign Derived Deduction Eligible Income (FDDEI); 3 Deduction Eligible Income (DEI); 4 Foreign Derived Ratio (FDDEI/DEI).

Part IV Determining FDII and/or GILTI Deduction (see instructions)

Table with 9 rows: 1 Deemed Intangible Income (DII); 2 Foreign Derived Ratio; 3a-3c Total FDII and GILTI; 4 Taxable Income; 5 Excess FDII and GILTI over Taxable Income; 6-9 FDII and GILTI Reductions.