SCHEDULE S (Form 1120-F)

Department of the Treasury Internal Revenue Service Name of corporation

Exclusion of Income From the International Operation of Ships or Aircraft Under Section 883

► Attach to Form 1120-F.

OMB No. 1545-0126

2009

Employer identification number

Pa	rt I Qualified Foreign Corporation	·	
-1a	Enter the name of the qualified foreign country in which the foreign corporation was organized ►		
b	Check one (and only one) of the following boxes to indicate the type of equivalent exemption granted by the foreign country listed on line 1a above: Domestic law Exchange of notes Income tax convention Enter the applicable authority (i.e., the specific provision) of the equivalent exemption type indicated on line 1b (see		
2	instructions) ►		
a b	Note. If an amount is not readily determinable, enter a reasonable estimate. If an estimate is used on any obelow, check here ► a Income from the carriage of passengers and cargo		
c	Bareboat charter income of a ship or dry lease income of an aircraft.	2c	
d	Incidental bareboat charter income of a ship or incidental dry lease income of an aircraft.	2d 2e	
e f	Incidental container-related income	20	
	included on lines 2d and 2e above	2f	
g	Capital gains derived by a qualified foreign corporation engaged in the international operation of ships or aircraft from the sale, exchange or other disposition of a ship, aircraft, container or related equipment or other moveable property used by that qualified foreign corporation in the international operation of ships or aircraft.	2g	
h	Income from participation in a pool, partnership, strategic alliance, joint operating agreement, code-sharing arrangement, international operating agency, or other joint venture described in Regulations section 1.883-1(e)(2)	2h	
3	Check one (and only one) of the following boxes to indicate the test under which the stock ownership test of Regulations section 1.883-1(c)(2) was satisfied: The publicly-traded test of Regulations section 1.883-2(a). Complete Part II. The CFC stock ownership test of Regulations section 1.883-3(a). Complete Part III. The qualified shareholder stock ownership test of Regulations section 1.883-4(a). Complete Part IV.		
4	Check the box if any of the shares of the foreign corporation's stock or the stock of any direct, indirect, or constructive shareholder are issued in bearer form		
5	If the box on line 4 is checked, check the box on this line 5 if none of the bearer shares were relied on to satisfy any of the stock ownership tests described in Regulations section 1.883-1(c)(2)		
	t II Stock Ownership Test for Publicly-Traded Corporations		
6 7	Enter the name of the country in which the stock is primarily traded ► Enter the name of the securities market(s) on which the stock is listed ►		
8	Enter a description of each class of stock relied on to meet the "regularly traded test" of Regulations section 1.883-2(d) (see instructions for description requirements) ►		
9	Do one or more 5% shareholders (see instructions for definition) own in the aggregate 50% or more of the vote and value of the outstanding shares of any class of stock for more than half the number of days during the tax year?		
10	For each class of stock relied on to meet the "regularly traded test" of Regulations section 1.883-2(d), indicate:		
а	 (i) The days during the tax year of the corporation in which the class of stock was closely held, without regard to the exception in Regulations section 1.883-2(d)(3)(ii) ►		
	such days > %		

- **b** For all qualified shareholders on which the corporation intends to rely to satisfy the closely-held exception test of Regulations section 1.883-2(d)(3), and who own stock in the closely-held block (directly, indirectly, or by applying the attribution rules of Regulations section 1.883-4(c)), enter:
 - (i) The total number of qualified shareholders, as defined in Regulations section 1.883-4(b)(1) ►.....
 - (ii) The total percentage of the value of the shares of the class of stock owned, directly or indirectly, by such qualified shareholders by country of residence (see instructions):

Country code (see instructions	6)	Percentage
	-	

(iii) The days during the tax year of the corporation that such qualified shareholders owned, directly or indirectly, their shares in the closely-held block of stock ►

Pa	art III Stock Ownership Test for Controlled Foreign Co	orporations	
11	Enter the percentage of the value of the shares of the CFC that is owned by all "qualified U.S. persons" identified in the qualified ownership statements required under Temporary Regulations section $1.883-3T(c)(2)$, applying the attribution of ownership rules of Temporary Regulations section $1.883-3T(b)(4) \ge 1.883-3T(b)(4) \ge 1.883-3T(b)(4)$		
12	Enter the period during which such qualified U.S. persons held such stock (see instructions)		
13	Enter the period during which the foreign corporation was a CFC (see instructions)		
14	Is the CFC directly held by qualified U.S. persons?	Yes 🗌 No 🗌	
Ра	art IV Qualified Shareholder Stock Ownership Test		
15	Check the box if more than 50% of the value of the outstanding shares of the corporation is owned (or treated as owned by reason of Regulations section 1.883-4(c)) by qualified shareholders for each category of income for which the exemption is claimed		
16	With respect to all qualified shareholders relied on to satisfy the		
а	Enter the total number of such qualified shareholders as defined in Regulations section 1.883-4(b)(1)		
b	Enter the total percentage of the value of the outstanding shares owned, applying the attribution rules of Regular section 1.883-4(c), by such qualified shareholders by country of residence or organization, whichever is applicable:		
	Country code (see instructions)	Percentage	
с	Enter the period during the tax year of the foreign corporation t	hat such stock was held by qualified shareholders Þ	

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