SCHEDULE L (Form 1118)
(Rev. December 2025)
Department of the Treasury
Internal Revenue Service

Foreign Tax Redeterminations

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

Attach to Form 1118.

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

OMB No. 1545-0123

Name of corporation

Employer identification number (EIN)

Use a separate Schedule L (Form 1118) for each applicable category of income. See instructions.

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 . . . . . _____

c If one of the RBT codes is entered on line a, enter the country code for the treaty country. See instructions . . . . . _____

d Check this box if election made under Regulations section 1.905-5(e) to account for foreign tax redeterminations with respect to pre-2018 tax years in foreign corporation's last pooling year. See instructions . . . . . ☐

Part I Increase in Amount of Foreign Taxes Accrued (see instructions)

Enter redetermined amounts by payor entity for each separate relation back year (starting with the most recent) followed by a subtotal for each relation back year. See instructions.

	1. U.S. tax year of taxpayer to which tax relates (relation back year) (MM/DD/YYYY)		2a. Name of payor entity	2b. EIN or reference ID number of payor entity	2c. Name of owner of payor entity, if applicable (see instructions)
A		(1)			
		(2)			
		(3)			
B		(1)			
		(2)			
		(3)			

		2d. EIN or reference ID number of owner	3. Country or U.S. territory to which tax is paid (enter code—see instructions)	4. Date additional foreign tax was paid (MM/DD/YYYY)	5. Foreign tax year to which tax relates (MM/DD/YYYY)	6. Payor entity's income subject to tax in the foreign jurisdiction (see instructions)	7. Additional tax accrued in local currency in which the tax is payable
A	(1)						
	(2)						
	(3)						
B	(1)						
	(2)						
	(3)						

		8. Additional tax accrued in functional currency of taxpayer's QBU or foreign corporation	9. Conversion rate of local currency to U.S. dollars	10. Additional tax acccrued in U.S. dollars (divide column 7 by column 9)	11. U.S. dollar tax of payor entity per original/amended return	12. Revised tax accrued (add column 10 and column 11)	13. Reference ID number for contested tax, if applicable (see instructions)	14. Check box if change caused to high-tax exception/ exclusion (see instructions)
A	(1)							☐
	(2)							☐
	(3)							☐
Subtotal by relation back year of taxpayer (add amounts in columns 10, 11, and 12)								
B	(1)							☐
	(2)							☐
	(3)							☐
Subtotal by relation back year of taxpayer (add amounts in columns 10, 11, and 12)								

Important: See *Computer-Generated Schedule L* in the separate Instructions for Schedule L (Form 1118).

Name of corporation | EIN

Part II Decrease in Amount of Foreign Taxes Paid or Accrued (see instructions)

Enter redetermined amounts by payor entity for each separate relation back year (starting with the most recent) followed by a subtotal for each relation back year. See instructions.

	1. U.S. tax year of taxpayer to which tax relates (relation back year) (MM/DD/YYYY)		2a. Name of payor entity	2b. EIN or reference ID number of payor entity	2c. Name of owner of payor entity, if applicable (see instructions)
A		(1)			
		(2)			
		(3)			
B		(1)			
		(2)			
		(3)			

		2d. EIN or reference ID number of owner	3. Country or U.S. territory from which tax was refunded or deemed refunded (enter code—see instructions)	4. Date foreign tax was refunded or deemed refunded (MM/DD/YYYY) (see instructions)	5. Foreign tax year to which tax relates (MM/DD/YYYY)	6. Payor entity's income subject to tax in the foreign jurisdiction (see instructions)	7. Tax refunded or deemed refunded in local currency in which the tax is payable
A	(1)						
	(2)						
	(3)						
B	(1)						
	(2)						
	(3)						

		8. Refunded amount in functional currency of taxpayer's QBU or foreign corporation	9. Conversion rate of local currency to U.S. dollars	10. Refunded amount in U.S. dollars (divide column 7 by column 9)	11. U.S. dollar tax of payor entity per original/amended return	12. Revised tax paid or accrued (subtract column 10 from column 11)	13. Check box if section 905(c)(2) two-year rule applies (see instructions)	14. Check box if change caused to high-tax exception/exclusion (see instructions)
A	(1)						☐	☐
	(2)						☐	☐
	(3)						☐	☐
Subtotal by relation back year of taxpayer (add amounts in columns 10, 11, and 12)								
B	(1)						☐	☐
	(2)						☐	☐
	(3)						☐	☐
Subtotal by relation back year of taxpayer (add amounts in columns 10, 11, and 12)								

Important: See *Computer-Generated Schedule L* in the separate Instructions for Schedule L (Form 1118).

Name of corporation | EIN

Part III Change in Inclusions; Change in Foreign Taxes Paid, Accrued, or Deemed Paid; and Change in Foreign Tax Credits Claimed

Enter the information below for the change in inclusions; change to the amount of foreign taxes paid, accrued, or deemed paid; and change in foreign tax credits claimed for each relation back year. This information is reported on an overall taxpayer basis and not on a per payor entity basis.

1. Relation back year (MM/DD/YYYY)	**2.** Redetermined direct section 901 and/or 903 taxes paid or accrued	**3.** Direct section 901 and/or 903 taxes paid or accrued per original/amended return	**4.** Redetermined section 951(a)(1) inclusion	**5.** Section 951(a)(1) inclusion per original/amended return

6. Redetermined taxes deemed paid under section 960(a)	**7.** Section 960(a) deemed paid taxes per original/amended return	**8.** Redetermined section 951A inclusion	**9.** Section 951A inclusion per original/amended return	**10.** Redetermined taxes deemed paid under section 960(d)	**11.** Section 960(d) deemed paid taxes per original/amended return

12. Redetermined taxes deemed paid under section 960(b)(1)	**13.** Section 960(b)(1) deemed paid taxes per original/amended return	**14.** Redetermined taxes deemed paid under section 902	**15.** Section 902 deemed paid taxes per original/amended return	**16.** Amount of FTC claimed per original/amended return	**17.** Amount of FTC claimed after redetermination

Part IV Change in U.S. Tax Liability

Enter the information below for the change in U.S. tax liability for each relation back year and other affected year. This information is reported on an overall taxpayer basis and not on a per payor entity basis.

1. Relation back year or affected tax year (MM/DD/YYYY)	**2.** Total redetermined U.S. tax liability	**3.** Total U.S. tax liability per original/amended return	**4.** Difference (subtract column 3 from column 2)

Important: See *Computer-Generated Schedule L* in the separate Instructions for Schedule L (Form 1118).

Name of corporation | EIN

Part V Annual Reporting for Contested Taxes

Taxpayers will enter the information below for each contested foreign income tax liability (or portion thereof) for which the taxpayer has previously made an election under Regulations section 1.905-1(d)(4) to claim a provisional foreign tax credit.

	1. Relation back year (MM/DD/YYYY)	2. Name of payor entity (see instructions)	3. Reference ID number for the contested tax	4. Country or U.S. territory to which tax was paid (enter code)
(i)				
(ii)				
(iii)				
(iv)				
(v)				

	5. Amount of contested tax provisionally claimed as credit	6. Contest ongoing	7. Contest resolved	8. Date contest resolved (MM/DD/YYYY)	9. Tax refunded, if any (see instructions)	10. Additional tax paid, if any (see instructions)
(i)		☐	☐			
(ii)		☐	☐			
(iii)		☐	☐			
(iv)		☐	☐			
(v)		☐	☐			

Important: See *Computer-Generated Schedule L* in the separate Instructions for Schedule L (Form 1118).