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		ed whenever f								651	113
SCHEDULE K-2 (Form 1065)	out form K-2		Ŭ,	ive Share Ite	ms—Interna ⁻	tional	1 6.	OM	B No. 1		
			•	Attach to Form 1065							
Department of the Treasury Internal Revenue Service		► Go to	o www.irs.gov/Form	1065 for instructions	and the latest inform	ation.		Ĺ	207	21	
Name of partnership							Employ	er ide	ntificati	on num	nber (EIN)
		e time these									
A Is the partnership a with						the home office or an		d der	ivatives	s deale	er?
Yes No I	f "Yes," enter your V	WP-EIN ►		T L <u>Y</u> e	es I No If "	Yes," enter your QI-Ell	N►				
C Check to indicate the pa	arts of Schedule K-2	2 that apply.	[Yes No						Yes	No
1 Does Part I apply?	? If "Yes," complete	and attach Part I.			Does Part VII apply?	f "Yes," complete and	attach Part VII		7		√
	? If "Yes," complete		2			If "Yes," complete and		jŏ	8		1
3 Does Part III apply	? If "Yes," complete	e and attach Part III	3	✓ 9	Does Part IX apply? If	f "Yes," complete and	attach Part IX .		9	✓	
		te and attach Part IV				"Yes," complete and a			10	✓	
		e and attach Part V				f "Yes," complete and			11		✓
		e and attach Part V	1 6		Does Part XII apply?	If "Yes," complete and	attach Part XII) .	12		
Check box(es) for additional s	•										
1. Gain on personal prope		4. Foreign tax	translation	7. Form	8858 information	□ 1	0. Partner loan trar	Isacti	ons		
2. Foreign oil and gas taxe		5. High-taxed			5471 information		1. Dual consolidate				
3. Splitter arrangements			A disallowed deducti		r forms	1	2. Other internatior	nal ite	ms		
				O	V		(attach description	on and	d state	ment)	
	Tax Credit Limi	tation	G		0						
Section 1-Gross Inco	ome			Eoroian	Source						
Descriptio	on	(a) U.S. source	(b) Foreign branch	(c) Passive	(d) General	(e) Other	(f) Sourced by	,	6	g) Tota	al
Boonpa		(u) 0.0. 000100	category income	category income	category income	(category code)) partner		13	9, 101	
1 Sales			0	Q							
Α				6							
В			.0.	5							
<u>C</u>		Q	19	1				\rightarrow			
2 Gross income from perform	nance of services		G X								
A		<u> </u>									
с			5								
3 Gross rental real estate	income		This should ti	e to line 18a on	the						
Α	5	10 A	8825. Use co	lumn A if all US	source.						
В		C N	For "Descript	ion" use Countr	y code						
<u> </u>			to which amo	unts relate.							
4 Other gross rental incon	ne oli		L								
А	G							\rightarrow			
БС								+			
				1	1	1	I				

For Paperwork Reduction Act Notice, see the Instructions for Form 1065.

3

Part II Foreign Tax Credit Limitation (continued)

Section 1–Gross Income (continued)

Description (a) U.S. source Description (b) Foreign branch category income (c) Passive category income (d) General category income (e) Differ category income (e) Differ 6 Interest income Image: Source Imag	Userprint (a) 0.5. source (b) Arcene phrame (c) Arcene category income (c) Other category income					Foreign	Source			
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Schedule K-2 (Form 1065) 2021	Schedule K-2 (Form 1065) 2021	C								
									Schedu	ile K-2 (Form 1065) 2021
			2							

Page **2**

Part II Foreign Tax Credit Limitation (continued)

Section 1–Gross Income (continued)

Section 1—Gross Income (continue	<i>u)</i>						
			Foreign			(f) Sourced by	
Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code)	partner	(g) Total
15 Net section 1231 gain							
Α							
В		Fill	out line items if				
C					× 0.		
16 Section 986(c) gain			licable. Most of				
17 Section 987 gain			se will				
18 Section 988 gain		corr	espond to the				
19 Section 951(a) inclusions A			. K (Losses will		<u>8</u> .		
A B		not	show up on this	G			
с		sect	tion) 🔫 🚽				
20 Other income (see instructions)							
A							
В				<u> </u>			
C		6		0			
21 Reserved for future use			S G				
A		GY					
B C							
		\sim \diamond	0				
22 Reserved for future use A			SY				
В		0-	5				
С		29 10					
23 Reserved for future use		G C					
Α							
В	0^{-1}						
C		×2					
24 Total gross income (combine lines 1							
through 23)		0					
Α	<u>60' </u>						
В							
c S							
B c D naso	itio'					Schedu	e K-2 (Form 1065) 20

Page 3

	Fill out line items if applicable Schedule K items are		
Schedule K-2 (Form 1065) 2021	present. These will be the losses that were not entered	E.	
Name of partnership	in Lines 1-24.		EIN

Foreign Tax Credit Limitation (continued) Part II

Section 2-Deductions

Se	ction 2–Deductions			Ecroion	Source			
	Description	(a) U.S. source	(b) Foreign branch	(c) Passive	(d) General	(e) Other	(f) Sourced by	(g) Total
	Description	(a) 0.0. source	category income	category income	category income	(category code)	partner	(9) 10121
25	Expenses allocable to sales income .							
26	Expenses allocable to gross income from performances of services				6			
27	Net short-term capital loss					×		
8	Net long-term capital loss							
29	Collectibles loss							
80	Net section 1231 loss							
81	Other losses				S			
32	Research & experimental (R&E) expenses				0			
	SIC code					V		
B					$\mathbf{A}^{-}\mathbf{G}^{-}$			
	SIC code				0			
3	Allocable rental expenses – depreciation, depletion, and amortization			e sum of these tie to line 18b				\rightarrow
4	Allocable rental expenses—other than depreciation, depletion, and amortization		on	the 8825	0			\rightarrow
35	Allocable royalty and licensing expenses – depreciation, depletion, and amortization .			cluding interest pense				
36	Allocable royalty and licensing expenses—other than depreciation, depletion, and amortization		2 300	55				
37	Depreciation not included on line 33 or 35	. ?	19 18					
88	Charitable contributions							
39	Interest expense specifically allocable under Regulations section 1.861-10(e)		x9					
0	Other interest expense specifically			Most of the tim	he this is the	1		
-	allocable under Regulations section	10	0	line to use for				
	1.861-10T	60 0	-					
1	Other interest expense – business			expense as op				
2	Other interest expense - investment .	0		39. See part IV	/ if to see if			
3	Other interest expense-passive activity			line 39 for mor	e information			
14	Section 59(e)(2) expenditures, excluding R&E expenses on line 32	N.		on which line t				
15	Foreign taxes not creditable but deductible							
	deductible						Schedu	ıle K-2 (Form

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Part II Foreign Tax Credit Limitation (continued)

Section 2–Deductions (continued)

				Foreign	Source			
	Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code)	(f) Sourced by partner	(g) Total
46	Section 986(c) loss							
47	Section 987 loss							
48	Section 988 loss							
49	Other allocable deductions (see instructions)					×		
50	Other apportioned share of deductions (see instructions)				~C1. K	C		
51	Reserved for future use				S	0		
52	Reserved for future use							
53	Reserved for future use							
54	Total deductions (combine lines 25 through 53) ►			This will ti				
55	from line 24)			income los schedule				\rightarrow
P	Part III Other Information for	Preparation of F	Form 1116 or 1118	3	0			
Se	ection 1-R&E Expenses Apporti	onment Factors	1.9	C				

Description (a) U.S. source (b) Foreign branch category income (c) Passive category income (d) General category income (e) Other (category code) (country code) (f) Sourced by partner (g) Total 1 Gross receipts by SIC code Will just be gross receipts the code Image: Code ima				C	Foreign S	ource			
A SIC code receipts the code		Description	(a) U.S. source				(category code)		by (g) Total
B SIC code will be 651.	1	Gross receipts by SIC code	/		Will just be gross	6			
B SIC code will be 651.	Α	SIC code			receipts the code				
C SIC code	в	SIC code		0 .9					
E SIC code Image: SIC code <thimage: code<="" sic="" th=""> Image: SIC code</thimage:>	С	SIC code							
F SIC code Image: SIC code <thimage: code<="" sic="" th=""> Image: SIC code</thimage:>	D	SIC code							
2 Exclusive apportionment with respect to total R&E expenses entered on Part II, line 32. Enter the following. A R&E expense with respect to activity performed in the United States (i) SIC code (ii) SIC code (iii) SIC code (iiii) SIC code (iiii) SIC code (iiiii) SIC code (iiiiiii) SIC code (iiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiii	Е	SIC code							
A R&E expense with respect to activity performed in the United States 2A(i) (i) SIC code 2A(i) (ii) SIC code 2A(ii) (iii) SIC code 2A(ii) (iii) SIC code 2A(ii) (iii) SIC code 2A(ii) (iii) SIC code 2A(iii) B R&E expense with respect to activity performed outside the United States 2B(i)	F	SIC code		x x9					
(i) SIC code	2	Exclusive apportionmen	t with respect to total R8	E expenses entered on	Part II, line 32. Enter the fo	llowing.			
(ii) SIC code	Α	R&E expense with respe	ect to activity performed	in the United States					
(iii) SIC code 2A(iii) B R&E expense with respect to activity performed outside the United States (i) SIC code 2B(i)		(i) SIC code	<u> </u>					>	2A(i)
B R&E expense with respect to activity performed outside the United States (i) SIC code 2B(i)		(ii) SIC code						🕨 [2A(ii)
(i) SIC code 2B(i)		(iii) SIC code						🕨 🙎	2A(iii)
	В	R&E expense with respe	ect to activity performed	outside the United State	S				
		(i) SIC code						>	2B(i)
(ii) SIC code C		(ii) SIC code						🕨 🚺	2B(ii)
(iii) SIC code		(iii) SIC code	<u>, 70, 1</u>					🕨 💈	2B(iii)

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Schedule K-	2 (Form 1065) 2021						~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	Page 6
Name of par	tnership						EIN	· ·
Deut	Other Information for	Dueneustics of F		1110 (continued)			<u> </u>	
Part II	Other Information for 2-Interest Expense Appo			1118 (continued)				
000000			5	Forei	n Source			
	Description	(a) U.S. source	(b) Foreign brar category incon	nch (c) Passive	(d) Gener category inc	come (category code	(f) Sourced by partner	(g) Total
1 Total	l average value of assets . <			Line 2, from Line				
	ions 734(b) and 743(b) stment to assets—average value.			end of year and l	· · ·			
intere	ts attracting directly allocable est expense under Regulations on 1.861-10(e)				ch	that eter		
alloc	r assets attracting directly able interest expense under Ilations section 1.861-10T			This would equal the nonrecourse debt	e average of the	assets that are secured by	qualified	
5 Asse form	ets excluded from apportionment				2	5		
(subt	l assets used for apportionment tract the sum of lines 3, 4, and 5 the sum of lines 1 and 2)			ONINS				
	ets attracting business interest	It appears sum should match 6						
	ets attracting investment interest ense	allocated to ea	ch line base	ed on				
	ts attracting passive activity est expense	whether they p investment or p						
nonc	s in stock of 10%-owned controlled foreign corporations attachment)	(6)	S	65				
	s in stock of CFCs (see attachment)							
Section	3-Foreign-Derived Intang	gible Income (FDI	I) Deduction					
	Description	(a) U.S.		(b) Passive	(c) General tegory income	(category code) (country code)	(e) Sourced by partner	(f) Total
	ign-derived gross receipts 🛛 . 🗧			Will just be gro	ss			
	of goods sold	ign-		receipts the co				
	red gross receipts			will be 651				

 derived gross receipts
 WII DE 051.

 4
 Other partnership deductions apportioned to foreign-derived gross receipts

3

Other Information for Preparation of Form 1116 or 1118 (continued) Part III

Section 4–Foreign Taxes

Section 4—Foreign Taxes		(b) Section 051A	category income		oreign branch category i	20020
Description	(a) Type of tax	U.S.				
		0.8.	Foreign	U.S.	Foreign	Partner
1 Direct (section 901 or						
903) foreign taxes:						
Α				2.0.7		
В						
c						
D						
E						
F						
2 Reduction of taxes (total)			4, 5	Q'		
A Taxes on foreign mineral income						
B Reserved for future use			G	0		
C International boycott provisions						
D Failure-to-file penalties			*0			
E Taxes with respect to splitter arrangements			6			
F Taxes on foreign corporate distributions						
G Other						
3 Foreign tax redeterminations		19 0				
Α			5			
Related tax year ►						
Date tax paid						
В						
Related tax year ►	0	S S				
Date tax paid		D'G				
c	0.0	10				
Related tax year ►						
Date tax paid ►						
5 Reserved for future use	× 5					
6 Reserved for future use						
<u> </u>					Sch	edule K-2 (Form 1065) 2
					001	
	2					
	×					
4 Reserved for future use						

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Part III Other Information for Preparation of Form 1116 or 1118 (continued)

Section 4–Foreign Taxes (continued)

	(d)	Passive category incon	ne	(e) General category incon	ne	(f) Other	(g) Total
	U.S.	Foreign	Partner	U.S.	Foreign	Partner	(category code)	(9) 101ai
A							Ť	
в								
c								
D							•	
E								
F								
						<u> </u>		
A					60.0			
в								
c 🗌					G			
D								
E					10 A			
F					6			
G				O				
-					0.1			
A								
в					19			
c				2				
				6				
	n 5–Other Tax li	nformation		0 6				

Section 5–Other Tax Information

		0, 6, 6	Foreign Source				
Desc	ription (a) U.S. source	(b) Section 951A category income (c) Foreign branch category income	(d) Passive category income	(e) General category income	(f) Other (category code) (country code)	(g) Sourced by partner	(h) Total
1 Section positive adjustme	income	11F on sch K					
2 Section negative adjustme	e income	13v on sch K					
3 Reserved future us							
4 Reserved future us							
	20					Schedu	le K-2 (Form 1065) 2021

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EIN

Sche	lule K-2 (Form 1065) 2021					Page 9
Name	of partnership			*6.	EIN	
					2	
	art IV Information on Partners' Section 250 Deduction With Respe					<u> </u>
	ction 1—Information To Determine Deduction Eligible Income (DEI) an	nd Qualified Busines	s Asset Investment	(QBAI) on For		3
		This will tie t	o your Form K-2 F	Part II line 24		
		1000 742(h) i	ncome. (11F on se		20	
	DEI cost of goods sold (COGS)		to your Form K-2 F		2b 2c	
2 2	DEl properly allocated and apportioned deductions Section 951(a) inclusions				3	
	CFC dividends	55. Less 74.	3(b) income. (11F	on sch K)	4	
5				X	5	
6	Domestic oil and gas extraction income				6	
7	Foreign branch income				7	
8	Partnership QBAI QBI Assets should be calculated on a	quarterly average	. Divide by 4		8	
Se	ction 2—Information To Determine Foreign-Derived Deduction Eligible	e Income on Form 8	993 (see instructions))		
		(a) Foreign-derived	(b) Foreign-derived	(c) Foreign-dei	rived	(d) Total
		income from all sales of general property	income from all sales of intangible property	income from all s		(add columns (a) through (c))
9	Gross receipts	general property				
10	COGS		2.			
11	Allocable deductions	5 0	0			
12	Other apportioned deductions				12	
Se	ction 3–Other Information for Preparation of Form 8993					
Se	ction 3—Other Information for Preparation of Form 8993		DEI	FDDEI		Total
Se 13	ction 3-Other Information for Preparation of Form 8993	U.S.	DEI	FDDEI		Total
	Interest deductions	enerally all interes			nclude	
	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e)		st goes here for lov	wer tiers Ir	nclude	
13 A	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e)			wer tiers Ir	nclude	
13 A B	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e)	BK (if applicable),	st goes here for lov	wer tiers Ir	nclude	
13 A B C 14	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e)	BK (if applicable), ection 2 Line 1.	st goes here for lov	wer tiers Ir	nclude	
13 A B C 14	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e) Other interest expense specifically allocable under Regulations section 1.861-10 Other interest expense Interest expense K-2 Part III S Sections 734(b) and 743(b) adjustment to assets – average value K-2 Part III S	BK (if applicable), ection 2 Line 1. Section 2 Line 2.	st goes here for lov	wer tiers Ir	nclude	
13 A B C 14 A	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e) Other interest expense specifically allocable under Regulations section 1.861-10 Other interest expense Interest expense apportionment factors Total average value of assets Sections 734(b) and 743(b) adjustment to assets – average value K-2 Part III S Assets attracting directly allocable interest expense under Regulations section 1.861-10(e)	BK (if applicable), ection 2 Line 1. Section 2 Line 2.	st goes here for lov Funds - most likely	wer tiers Ir y here	nclude	
13 A B C 14 A B	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e)	ection 2 Line 1. Section 2 Line 2. Motion 2 Line 2.	st goes here for lov Funds - most likely	wer tiers Ir y here	nclude	
13 A B C 14 A B	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e)	BK (if applicable), ection 2 Line 1. Section 2 Line 2. 10T← K-2 Part I	st goes here for lov Funds - most likely	wer tiers Ir y here	nclude	
13 A B C 14 A B	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e) Other interest expense specifically allocable under Regulations section 1.861-10 Other interest expense apportionment factors Total average value of assets Sections 734(b) and 743(b) adjustment to assets—average value K-2 Part III S Assets attracting directly allocable interest expense under Regulations section 1.861-10(e) Other assets attracting directly allocable interest expense under Regulations section 1.861-10(e) Other assets attracting directly allocable interest expense under Regulations section 1.861-10(e) Total assets used for apportionment formula Total assets used for apportionment (the sum of lines 14C, 14D, and 14E subtracted from the subtracted	BK (if applicable), ection 2 Line 1. Section 2 Line 2. 10T← K-2 Part I	st goes here for lov Funds - most likely	wer tiers Ir y here		
13 A B C 14 A B	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e)	BK (if applicable), ection 2 Line 1. Section 2 Line 2. 10T← K-2 Part I sum of lines 14A and 14B)	st goes here for lov Funds - most likely	wer tiers Ir y here		
13 A B C 14 A B	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e)	BK (if applicable), ection 2 Line 1. Section 2 Line 2. 10T← K-2 Part I sum of lines 14A and 14B)	st goes here for lov Funds - most likely	wer tiers Ir y here	nclude	
13 A B C 14 A B C D E F 15 A	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e)	BK (if applicable), ection 2 Line 1. Section 2 Line 2. 10T← K-2 Part I sum of lines 14A and 14B)	st goes here for lov Funds - most likely	wer tiers Ir y here	nclude	
13 A B C 14 A C D E F 15 A B	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e)	BK (if applicable), ection 2 Line 1. Section 2 Line 2. 10T← K-2 Part I sum of lines 14A and 14B)	st goes here for lov Funds - most likely	wer tiers Ir y here	nclude	
13 A B C 14 A B C D E F 15 A B C	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e) Other interest expense specifically allocable under Regulations section 1.861-10T Other interest expense Interest expense apportionment factors Total average value of assets Sections 734(b) and 743(b) adjustment to assets – average value K-2 Part III S Assets attracting directly allocable interest expense under Regulations section 1.861-10(e) Other assets attracting directly allocable interest expense under Regulations section 1.861-10(e) Other assets attracting directly allocable interest expense under Regulations section 1.861-10(e) Other assets attracting directly allocable interest expense under Regulations section 1.861-10(e) Other assets used for apportionment formula Total assets used for apportionment factors Gross receipts by SIC code SIC code SIC code SIC code SIC code	BK (if applicable), ection 2 Line 1. Section 2 Line 2. 10T← K-2 Part I sum of lines 14A and 14B)	st goes here for lov Funds - most likely	wer tiers Ir y here		
13 A B C 14 A B C D E F 15 A B C 16	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e) Other interest expense specifically allocable under Regulations section 1.861-10T Other interest expense specifically allocable under Regulations section 1.861-10T Interest expense apportionment factors Total average value of assets Sections 734(b) and 743(b) adjustment to assets—average value K-2 Part III S Assets attracting directly allocable interest expense under Regulations section 1.861-10(e) Other assets attracting directly allocable interest expense under Regulations section 1.861-10(e) Other assets attracting directly allocable interest expense under Regulations section 1.861-10(e) Other assets attracting directly allocable interest expense under Regulations section 1.861-10(e) Other assets attracting directly allocable interest expense under Regulations section 1.861-10(e) Other assets attracting directly allocable interest expense under Regulations section 1.861-10(e) Other assets attracting directly allocable interest expense under Regulations section 1.861-10(e) R&E expenses apportionment formula Total assets used for apportionment formula R&E expenses apportionment factors Gross receipts by SIC code SIC cod	BK (if applicable), ection 2 Line 1. Section 2 Line 2. 10T← K-2 Part I sum of lines 14A and 14B)	st goes here for lov Funds - most likely	wer tiers Ir y here		
13 A B C 14 A C D E F 15 A B C 16 A	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e)	BK (if applicable), ection 2 Line 1. Section 2 Line 2. 10T← K-2 Part I sum of lines 14A and 14B)	st goes here for lov Funds - most likely	wer tiers Ir y here	16A	
13 A B C 14 A B C D E F 15 A B C 16 A B	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e)	BK (if applicable), ection 2 Line 1. Section 2 Line 2. 10T← K-2 Part I sum of lines 14A and 14B)	st goes here for lov Funds - most likely	wer tiers Ir y here	16A 16B	
13 A B C 14 A B C D E F 15 A B C 16 A B	Interest deductions Interest expense specifically allocable under Regulations section 1.861-10(e)	BK (if applicable), ection 2 Line 1. Section 2 Line 2. 10T← K-2 Part I sum of lines 14A and 14B)	st goes here for lov Funds - most likely	wer tiers Ir y here	16A 16B 16C	

Schedu	ıle K-2 (Form 1065) 2021								Page 10
Name	of partnership							E	N
Da	rt V Distributions Fr	rom Foreign Corporations	to Partnersk	ain				0.0	
Γd				(b) EIN o	r		(d) Functional	currency of	(e) Amount of distribution
	(a) Name of	distributing foreign corporation		reference ID n	umber	(c) Date of distribution	distributing forei	gn corporation	in functional currency
Α							X (0	
<u>B</u>									
C D									
E									
F									
G									
<u> H</u>									
						5	R		
К									
L						0.			
<u>N</u>					6				
	(f) Amount of E&P distribution	(g) Spot rate (functional	(h) Amount c	of distribution	(i) Am	ount of E&P distribution	(j) Qualified	d foreian	(k) Reserved for
	in functional currency	currency to U.S. dollars)	in U.S.	dollars		in U.S. dollars	corpor		future use
Α					5				
В			2						
<u> </u>									
D E									
F			0	6					
G			9	2					
Н				,					
<u> </u>			O						
J K			5						
L									
М									
<u>N</u>		D 40. X							
0									Schedule K-2 (Form 1065) 2021
	DIS	additional additional							

Schec	lule K-2 (Form 1065) 2021										Page 11
Name	of partnership									EIN	
Pa	art VI Informatio	n on Partners'	Section	951(a)(1)	and Sectior	951A	Inclusions				
	Separate category (enter c										
b	If U.S. source, complete as	s a separate Part V	'l by separat	te category	and check box						<u>.</u> ▶ □
	(a) Name of (CFC	(b) EII reference II		(c) Ending of tax year	CFC	(d) Partners' sha of CFC items throu their ownership the partnership ("aggregate share	ugh in	(e) Aggregate share subpart F income	of (f) Aggregate section 951(a)(1)(B) inclusion	(g) Tested income
Α									0, 0		
B C											
D								G			
Е							7.0				
F											
G								6			
<u>н</u> Т									6		
J									2		
Κ											
1	Partnership total (sum fo	or all CFCs) .				<u> </u>	<u>····</u> ···				
	(h) Tested loss	(i) Aggregate sh tested incor			jate share of ed loss	Qualifie	gregate share of ed Business Asset estment (QBAI)		Aggregate share of the tested loss QBAI amount	(m) Aggregate share of tested interest income	(n) Aggregate share of tested interest expense
Α						• •	Q				
В				<u> </u>		5					
<u>C</u>					6	5					
D E											
F				20							
G				N.							
Н											
<u> </u>		G									
J K				0							
1		G.A									
	ON.	200 cm	lone	-						S	chedule K-2 (Form 1065) 2021

EIN

Part VII Information To Complete Form 8621

Section 1—General Information on Passive Foreign Investment Company (PFIC), Qualified Electing Fund (QEF), or Qualifying Insurance Corporation (QIC)

			General Information					
(a) Name of PFIC		(b) EIN or reference ID number	(c) Addres	s of PFIC	900	(d) Beginnin PFIC tax ye	g of (e) ear PF	Ending of IC tax year
						•		
			• •					
					No.			
				5	<u>0</u> .			
				6				
				0				
S	Summary of Annual Inf	ormation	8	B	Informa	tion Regarding	Elections	
	-				(k) Check if			
(f) Description of each class of PFIC shares	(g) Dates PFIC shares acquired during tax year (if applicable)	(h) Total number PFIC shares held end of tax year	at PFIC shares held at	(j) Election by partnership (enter code—see instructions)	(k) Check II foreign corporation has documented its eligibility to be treated as a qualifying insurance corporation under section 1297(f)(2).	(I) Check if PFIC has indicated its shares are "marketable stock" within the meaning of section 1296(e).	(m) Check if PFIC is also a controlled foreign corporation (CFC) within the meaning of section 957.	(n) Check if PFIC meets the income test or asset test of section 1297(a) for the tax year.
		12 6)					
		<u> </u>						
	160° V							
	0							
10.30							Schedule K-2	(Form 1065) 2021

Part VII Information To Complete Form 8621 (continued)

Section 2—Additional Information on PFIC or QEF

General Info	ormation	QEF Infe	ormation	Mark-to-Mark	et Information	Section 1291 and Other Information			
(a) Name of PFIC	(b) EIN or reference ID number	(c) Ordinary earnings	(d) Net capital gain	(e) Fair market value of PFIC shares at beginning of tax year	(f) Fair market value of PFIC shares at end of tax year	(g) Dates PFIC shares were acquired	(h) Amount of cash and fair market value of property distributed by PFIC during the current tax year (if applicable)	(i) Dates of distribution	
					<u>~</u>				
				. 0					
					6	O			
				× ×'0					
				S					
					V				
			6						

Section 1291 and Other Information

(j) Total creditable foreign taxes attributable to distribution by PFIC	(k) Total distributions from PFIC in preceding 3 tax years	(I) Dates PFIC shares disposed of during tax year (if applicable)	(m) Amount realized on disposition of PFIC shares	(n) Tax basis of PFIC shares on dates of disposition	(o) Gain (loss) on disposition of PFIC shares
		0 6			
	0~	<u>5</u> 5			
		* 2			
	5 10	0			
		*			
DIS	Sditione				Schedule K-2 (Form 1065) 2021
~	3.5 dition				



Sche	dule K-2 (Form 1065) 2021			6	Page 14
Name	of partnership			EIN	
Pa	rt VIII Partnership's Interest in Foreign Corporation Income	(Section 960)		0.	
Α	Enter EIN or reference ID number of controlled foreign corporation	B Separat	te category (enter code-see	instructions)	
С	If PAS was entered on line B, enter the applicable grouping under Regulations sect	ion 1.904-4(c). See instruction	ons		
D	Check the box and attach a statement if there is more than one source country for	a line. See instructions .			
Е	If U.S. source, check the box and complete a separate Part VIII				
F	If FORI or FOGEI, check the box and attach a separate Part VIII				
	Enter amounts in functional currency of the foreign corporation (unless otherwise noted).	(i) Country code	(ii) Partnership's share of net income	(iii) Partnership's share of average asset value	(iv) Reserved for future use
	Subpart F income groups			O +	
а	Dividends, interest, rents, royalties, and annuities (total)			. 6	
	(1) Unit				
	(2) Unit				
b	Net gain from certain property transactions (total)		60		
	(1) Unit				
	(2) Unit		N 0		
С	Net gain from commodities transactions (total)		° G		
	(1) Unit		0		
	(2) Unit	S			
d	Net foreign currency gain (total) . .				
	(1) Unit				
_	(2) Unit				
е	Income equivalent to interest (total)				
	(1) Unit (2) Unit				
f	Foreign base company sales income (total)				
	(1) Unit				
	(2) Unit	6			
a	Foreign base company services income (total)	7			
5	(1) Unit				
	(2) Unit				
h	Full inclusion foreign base company income (total)				
	(1) Unit				
	(2) Unit				
i	Insurance income (total)				
	(1) Unit				
	(2) Unit				
j	International boycott income (total)				
k	Bribes, kickbacks, and other payments (total)				
	Section 901(j) (total)				
	his gold			s	ichedule K-2 (Form 1065) 2021

Sch	edule K-2 (Form 1065) 2021				Page 15
Nan	e of partnership			EIN	
Р	art VIII Partnership's Interest in Foreign Corporation Income	(Section 960) (continu	ued)		
	Enter amounts in functional currency of the foreign corporation (unless otherwise noted).	(i) Country code	(ii) Partnership's share of net income	(iii) Partnership's share of average asset value	(iv) Reserved for future use
2	Recaptured subpart F income				
3					
	(1) Unit				
	(2) Unit				
4	Residual income group (total)				
	(1) Unit			0.	

5 Total . Partners' Information for Base Erosion and Anti-Abuse Tax (Section 59A)

Part IX

Section 1—Applicable Taxpayer (see instructions)

(2) Unit

	Description	(a) Total	(b) Total ECI gross receipts	(c) Total non-ECI gross receipts
1	Gross receipts for section 59A(e)			
2	Gross receipts for the first preceding year the 4 years including the current			
3	Gross receipts for the second preceding year			
4	Gross receipts for the third preceding year			
5	Amounts included in the denominator of the base erosion percentage as described in Regulations section 1.59A-2(e)(3)			

Section 2—Base Erosion Payments and Base Erosion Tax Benefits (see instructions)

	Description	(a) Total	(b) Total base erosion payments	(c) Total base erosion tax benefits
6	Reserved for future use			
7	Reserved for future use .			
8	Purchase or creations of property rights for intangibles (patents, trademarks, etc.)			
9	Rents, royalties, and license fees			
10a	Compensation/consideration paid for services not excepted by section 59A(d)(5)			
b	Compensation/consideration paid for services excepted by section 59A(d)(5)			
11	Interest expense			ithout regard to 163(j). So the
12	Payments for the purchase of tangible personal property	l	ower tier would include dedu	ctible interest and Line 13K.
13	Premiums and/or other considerations paid or accrued for insurance and reinsurance as covered by sections 59A(d)(3) and 59A(c)(2)(A)(iii)			
14a	Nonqualified derivative payments			
b	Qualified derivative payments excepted by section 59A(h)			
15	Payments reducing gross receipts made to surrogate foreign corporation			
16	Other payments – specify ►			
17	Base erosion tax benefits related to payments reported on lines 6 through 16, on which tax is imposed by section 871 or 881, with respect to which tax has been withheld under section 1441 or 1442 at the 30% (0.30) statutory withholding tax rate			

Part IX Partners' Information for Base Erosion and Anti-Abuse Tax (Section 59A) (continued) Section 2–Base Erosion Payments and Base Erosion Tax Benefits (see instructions) (continued)

		(a) Total	(b) Total base erosion payments	(c) Total base erosion tax benefits
18	Portion of base erosion tax benefits reported on lines 6 through 16, on which tax is imposed by section 871 or 881, with respect to which tax has been withheld under section 1441 or 1442 at reduced withholding rate pursuant to income tax treaty. Multiply ratio of percentage withheld divided by 30% (0.30) times tax benefit. See instructions	divio	2	
19	Total base erosion tax benefits (subtract the sum of lines 17 and 18 from the sum of lines 8 through 16) .		9.	
20	Reserved for future use		.0	
21	Reserved for future use			
22	Reserved for future use			
Pa	rt X Foreign Partners' Character and Source of Income and Deductions	6 0	·	·

Section 1-Gross Income

					Pa	rtnership Determinat	ion	
	Description	(a) Total	(b) Partner	E	CI		Non-ECI	
	Description		determination	(c) U.S. source	(d) Foreign source	(e) U.S. source (FDAP)	(f) U.S. source (other)	(g) Foreign source
1	Ordinary business income (gross)				This will only have			
2	Gross rental real estate income		G		amounts if the			
3	Other gross rental income				lower tier as			
4	Guaranteed payments for services .			· · · · · · · · · · · · · · · · · · ·	foreign activity			
5	Guaranteed payments for use of capital				which is unlikely.			
6	Interest income	Amour	nts here will					
7	Dividends		Part II,					
8	Dividend equivalents			G				
9	Royalties and license fees	Sectio		5				
10	Net short-term capital gain	0~	5					
11	Net long-term capital gain							
12	Collectibles (28%) gain							
13	Unrecaptured section 1250 gain	O'						
14	Net section 1231 gain		x 9					
15	Reserved for future use							
16	Reserved for future use		0					
17	Reserved for future use	<u> 20, 75</u>						
18	Reserved for future use							
19	Reserved for future use							
20	Other income (loss) not included on lines 1 through 19							
21	Gross income (sum of lines 1 through 20)							
				•			Sched	ule K-2 (Form 1065) 2021

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Part X Foreign Partners' Character and Source of Income and Deductions (continued)

Section 2-Deductions, Losses, and Net Income

				Partnership Determination				
Description		(a) Total	(b) Partner determination	ECI Non-ECI				
				(c) U.S. source	(d) Foreign source	(e) U.S. source (FDAP)	(f) U.S. source (other)	(g) Foreign source
1	Expenses related to ordinary business income (gross)				6			
2	Research and experimental expenses					×		
3	Expenses from rental real estate							
_4	Expenses from other rental activities .							
5	Royalty and licensing expenses							
6	Section 179 deduction				5	0		
7	liabilities		Amounts here match Part II,	e will	C ^C			
8	Interest expense directly allocable under Regulations sections 1.882-5(a)(1)(ii)(B) and 1.861-10T		Section 2	AN G	21.00			
9	Other interest expense							
10	Section 59(e)(2) expenditures		6		0			
11	Net short-term capital loss							
12	Net long-term capital loss			×9				
13	Collectibles loss							
14	Net section 1231 loss			~~~				
15	Other losses			5				
				2				
16	Charitable contributions			/				
17	Other ►		\mathbf{G}^{\star}					
18	Other ►							
19	Reserved for future use							
20	Reserved for future use							
21	Reserved for future use							
22 23	Reserved for future use	0	<u> </u>					
<u>23</u> 24								
	Total (sum of lines 1 through 23) Net income (loss) (line 21 (Section 1)							
25								
	minus line 24 (Section 2))						Sched	ule K-2 (Form 1065) 2021

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Schedu	le K-2 (Form 1065) 202	21		Page 18		
Name c	f partnership			4		
				J		
Pa			Source of Income and Deductions (continued)			
Sec		ion and Apportionment Met	hods for Deductions			
1	Gross income		Part X Section 1 Line 21 Columns C&D			
а	Gross ECI			(iii)		
b	Worldwide gross i	income . <	Part X Section 1 Line 21.			
			b			
2	Assets					
а	Average U.S. asse	ets (inside basis) 🛛 < 🔂 🚦 				
b	Worldwide assets		Line 1 (i) Key/Factor	(ii) Allocation		
			a			
3	Liabilities		Tax liabilities b			
а		ities of partnership				
b	Directly allocated partnership indebtedness Control of the second					
			(i) Key/Factor	(ii) Allocation		
4	Personnel		a			
а	Personnel of U.S.	trade or business	b			
b	Worldwide person	nnel				
5	Gross receipts fro	m sales or services by SIC code	<u> </u>			
	(i) SIC code	(ii) ECI				
а						
b						
Sec	tion 4-Reserve	ed for Future Use				

	Description	(a) Total	(b) ECI	(c) Non-ECI
1	Reserved for future use			
2	Reserved for future use			
3	Reserved for future use			
4	Reserved for future use			
5	Reserved for future use			
6	Reserved for future use			
7	Reserved for future use			
8	Reserved for future use			
9	Reserved for future use			
10	Reserved for future use			

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Pa 1 2	Specify the number of units of the partnership issued and outstanding						
3							
Ū	(i) Beginning of allocation period	(ii) End of allocation period	(iii) Dividends (enter four decimal places)	(iv) Dividend equivalents (enter four decimal places)	(v) Total (enter four decimal places)		
Pa	rt XII Section 871(m) Tax Li	ability of a Qualified Derivation	ves Dealer (QDD)	<u> </u>			
Name	of QDD			8 18	Schedule of		
Indica	te the year or portion of the year to which	h the schedule relates. (Enter month, c	lay, and year for beginning and ending	g dates.)			
Bea	inning ,2	20 , and ending	,20	C.			
	,.	,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				
	Summary	of QDD Tax Liability	(a) Gross	amount (b) Withholding tax	x rate (c) Amount of tax liability (column (a) x column (b))		
1	Total section 871(m) amount						
2	Total dividends received in equity deriv	vatives dealer capacity	S. S.				
3	Total QDD tax liability pursuant to sect	ion 3.09(A) of the Qualified Intermedia	ry Agreement				
4	Total QDD tax liability pursuant to section 3.09(B) of the Qualified Intermediary Agreement						
5	Total QDD tax liability pursuant to sect	ion 3.09(C) of the Qualified Intermedia	ry Agreement				
а	Income type 🕨		0 0				
b	Income type 🕨						
с	Income type 🕨						
d	Income type						
е	Income type 🕨						
f	Income type 🕨						
g	Income type ►	<u> </u>					
6	Total of line 5 amounts						
	Income type ► Income type ► Total of line 5 amounts	or elle alle			Schedule K-2 (Form 1065) 202		
		Ker Ke					
	SX						

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