

(Year) Income Statement of a Controlled Foreign Company (CFC) For Individuals

Name of Trust Withholding Agency		Tax Code No. of Trust Withholding Agency				
<p>Instructions:</p> <p>1. If the beneficiary is an individual, please complete this form. If the beneficiary is a profit-seeking enterprise, please fill out the "Income Statement of a Controlled Foreign Company (CFC) for Profit-Seeking Enterprises." If additional space is needed, please replicate the statement.</p> <p>2. If the trust property includes shares or capital of an affiliated enterprise located in a low-tax country or jurisdiction outside the Republic of China (hereafter referred to as "low-tax jurisdiction"), the beneficiary's (or the settlor if the beneficiary is not determined) direct shareholding ratio (including both trust-held and non-trust-held shares) should be calculated in accordance with Article 12-1 of the Income Basic Tax Act., adding the indirect shareholding ratio of the beneficiary, as well as the direct and indirect shareholding ratios of related or nominal. If the total reaches 50%, the affiliated enterprise in the low-tax jurisdiction is considered a CFC of the beneficiary.</p> <p>3. This statement should be completed separately for each trust withholding agency and each CFC. Generally, one form should be submitted for each CFC. If different beneficiaries who directly hold shares or capital of a CFC, where the CFC possesses financial instruments measured at fair value through profit or loss (hereafter referred to as FVPL), choose different methods to deal with the revaluation gains and losses of FVPL, please submit a separate statement for each beneficiary. (Regarding the selection of FVPL adjustment items, the tax authorities may assess the information based on of the annual income tax return filed by the beneficiary.)</p> <p>4. Please also complete the " Attachment : Statement of the Shareholding of the Beneficiary with the Organization Chart" and submit it along with this statement.</p>						
Detail of Beneficiary in this statement:						
1	Name	Tax Code No.	2			
Part 1: General Information of CFC						
Chinese Name						
English Name						
Tax Identification Number/Other Identification Number						
Country Code of Low-Tax Country (or Jurisdiction)						
Does the CFC Have Substantial Operating Activities in its Registered Country or Region?		<input type="checkbox"/> Yes <input type="checkbox"/> No				
Note: If the CFC does not have substantial operating activities in its registered country or region, then Parts 2 to 4 shall be completed.						
Part 2: Current-Year Earnings			UNIT: NTD			
Item		Amount				
Net Profit (or Loss) after Tax of the Current Year (A1)						
Other Profit (or Loss) Items Included in the Undistributed Surplus Earnings of the Current Year (A2)						
Adjustment Items Derived from Invested Enterprises in Non-low-tax Jurisdictions Recognized under the Equity Method	Investment Income (or Loss) (A3)					
	Realized Investment Income (or Loss)	Resolved Amount of Surplus Earnings Distribution (A4)				
		Realized Investment Losses (A5)				
	Adjustment Amount for the Disposal of Equity Interests (A6)					
<input type="checkbox"/> Choose to defer the inclusion of fair value changes in the CFC's current-year earnings until realized (those who do not check this item do not need to fill in the "FVPL Adjustment Items" column).						
FVPL Adjustment Items	Amount of FVPL's Fair Value Changes (A7)					
	Adjustment Amount for the Disposal of FVPL (A8)					
	Adjustment Amount for the Reclassification of FVPL (A9)					
CFC's Current-Year Earnings (Losses) [A10=A1+A2-A3+(A4-A5)+A6-A7+A8+A9]						
Part 3: The Statements of Loss Deductions of the Past 10 Years			UNIT: NTD			
Year	Declared Earnings (B1)	Declared Losses (B2)	Deducted Amount of Assessed Losses as of the End of Last Year (B3)	The Capital Reduction to Compensate the Assessed Losses in this Year (B4)	The Deducted Amount in this Year (B5)	Balance of Undeducted Assessed Losses (B6)=(B2-B3-B4-B5)
Total						
Note: The CFC's losses incurred in or before 2022 shall not be deducted from the CFC's earnings generated in 2023 or later.						
Part 4 is not required to be completed if any of the following conditions are met.						
【where the operating period is less than one year, Column A10 × (12 ÷ number of operating months _____) = _____ (A11), the amount in Column A10 for the following inspection conditions should be included in Column A11, which is calculated based on the annualized earnings (losses). (Any part of the operating period less than a full month shall be regarded as a full month for such calculation.)】						
<input type="checkbox"/> Amount of Column A10 ≤ NTD 0						
<input type="checkbox"/> "NTD 0 < Amount of Column A10 ≤ NTD 7 million", and "The sum of Column A10 of each CFC that their shares or capital are directly held by the individual beneficiary and his/her spouse and dependents who are a member of the tax household and do not meet the substantial operating activities criteria is NTD _____ ≤ NTD 7 million."						
Part 4: Calculate Business Income			UNIT: %, NTD			
Item		NTD/Ratio				
CFC's Current-Year Earnings (C1=A10)						
The Legal Reserve or Items of Restricted Distribution of Surplus Earnings (C2)						
The Deducted Amount in this Year from CFC's Losses of the Past 10 Years Assessed by the Tax Authority (C3, please fill in the sum of Column B5 of Part 3 of this Statement.)						
Serial No.	Beneficiary Name	Beneficiary Code No.	The beneficiary's direct holding ratio shall be calculated using a weighted average over the trust holding period. (C4)	CFC Business Income CFC [C5=(C1-C2-C3)×C4]		
Note: The amount of Column C5 of each beneficiary shall be filled in the Column "CFC Investment Income/ Business Income" of the "Beneficiary Income Statement – Overseas Income". If it is negative, fill in "0."						
Part 5: Details of Dividends or Surplus Earnings Beneficiary Received and Overseas Income Tax Credit			UNIT: NTD			
No. ____	Beneficiary Name	Beneficiary Code No				
Part 5.1:						
Fiscal Year which the CFC's Surplus Earnings were generated	Amount of Dividends or Surplus Earnings distributed from the CFC this year, calculated based on the benefit distribution proportion. (Excluding Year 2022 and Previous Years) (DA)	Income Taxes Paid in Source Jurisdiction on CFC's Dividends or Surplus Earnings, calculated based on benefit distribution proportion. (EA)				
2023						
Total	(DA1)	(EA1)				

(Continue on the back of this page)

Copy I: For Data Entry

Copy II: For Tax Jurisdiction

Date:

Statement No.

Receipt No.

Part 5.2:								
Accrual Year of CFC's Surplus Earnings	CFC Business Income Included in Basic Income					Amount of Dividends or Surplus Earnings Received This Year Not Yet Included in Basic Income (D6)	Income Taxes Paid in Source Jurisdiction on CFC Business Income (D3) Included in Basic Income (E1)	Income Taxes Paid in Source Jurisdiction on Income (D6) Not Yet Included in Basic Income (E2)
	CFC Business Income Included in Basic Income (D1)	Cumulative Amount of CFC Business Income Received (or Transacted) By Last Year 【D2= Sum of Column D2, D3 and D4 of Last Year】	Amount of Dividends or Surplus Earnings Received This Year (D3)	Balance of Calculated CFC Business Income by Transaction Ratio on Transaction Date (D4)	Balance of CFC Business Income Not Yet Received (nor Transacted) as Dividends or Surplus Earnings (D5 = D1 - D2 - D3 - D4, please fill in zero if amount of D5 is negative)			
2023								
Total			(D3A)			(D6A=DA1-D3A)	(E1A)	(E2A=EA1-E1A)
Declaration: <input type="checkbox"/> The Trustee has fulfilled the duty of cooperation and made reasonable efforts to verify; however, due to _____, it was still not possible to obtain the information in Part 5.2 regarding the identification of business income previously calculated and included in basic income for the dividends or surplus earnings distributed in the current year, resulting in the inability to fully report the information in those columns.								
Part 6: Details of The Transaction of CFC Shares or Capital							UNIT: NTD	
Transaction Date		Income Resulted from Transaction (F1)			Original Acquisition Cost (F2)			
Note: 1. The total amount of “ Amount of Dividends or Surplus Earnings Received This Year Not Yet Included in Basic Income” (D6A) and “ Income Taxes Paid in Source Jurisdiction on Income (D6) Not Yet Included in Basic Income” (E2A), should be filled in the column “CFC Dividends or Surplus Earnings Received” and columns “Overseas Income Tax Paid” of the “ Income Statement of Beneficiary – Overseas Income.” 2. When disposing of CFC shares or capital, please calculate the income from property transactions and fill it in the “Income from Property Transactions” column of the “ Income Statement of Beneficiary – Overseas Income.”								