

BE-15 Identification Number

\*Do not enter Social Security Number as Identification Number

# 2024 ANNUAL SURVEY OF FOREIGN DIRECT INVESTMENT IN THE UNITED STATES MANDATORY – CONFIDENTIAL FORM BE-15C

Due date:	May 31, 2025		Name and address of U.S. business enterprise							
Mail reports to: UBD	www.bea.gov/efile U.S. Department of Commerce	Name of U.S. affiliate								
	Bureau of Economic Analysis Direct Investment Division, BE–49(A) 4600 Silver Hill Rd		c/o (care of)							
Deliver reports to:	Washington, DC 20233 U.S. Department of Commerce Bureau of Economic Analysis Direct Investment Division, BE–49(A) 4600 Silver Hill Rd Suitland, MD 20746		Street or P.O. Box 0							
			City 0			0998	State			
Fax reports to:	(301) 278–9500	1005	ZIP Code 0	0r	Foreign Postal C	ode				
Assistance:	E-mail: be12/15@bea.gov			UI						
	Telephone: (301) 278-9247 Copies of blank forms: www.bea.gov/fdi									

Include your BE-15 Identification Number with all requests.

### Have you been notified that you must file a BE-15 Survey?

If so, you must file a BE-15A, BE-15B, BE-15C, or BE-15 Claim for Exemption by the due date.

#### Who must file BE-15C:

Those U.S. affiliates with any one of the following items exceeding \$40 million, but with all items not exceeding \$120 million (positive or negative):

- Total assets
- Sales or gross operating revenues
- Net income

If you do not meet the filing criteria, see instruction I.A.1 on page 12 to determine which form to file.

Certain private funds may be exempt from filing. See item 2(d) of the BE-15 Claim for Exemption for more information.

### **Mandatory and Confidential**

This survey is being conducted under the International Investment and Trade in Services Survey Act (P.L. 94–472, 90 Stat. 2059, 22 U.S.C. 3101–3108, as amended). The filing of reports is mandatory, and the Act provides that your report to this Bureau is confidential. Whoever fails to report may be subject to penalties. See page 11 for more details.

CONTACT INFORMATION					CERTIFICATION						
Provide information of person to consult about this report:					The undersigned official certifies that this report has been prepared in accordance with the applicable instructions, is complete, and is substanti						
1000	Name 0				accurate including estimates that may have been pro-	vided.					
1029	Street 1 0				Signature of Authorized Official	Date 0					
1030	Street 2 0			0990	Name 0						
1031	City 0	State	Zip	0991	Title 0						
1001	Telephone Number 0		Extension 0	0992	Telephone Number 0	Extension 0					
0999	Fax Number 0			0993	Fax Number 0						
1028	E-mail Address 0										

**NOTE:** BEA uses a Secure Messaging System to correspond with you via encrypted message to discuss questions relating to this form. We may use your e-mail address for survey-related announcements and to inform you about secure messages. When communicating with BEA by e-mail, please do not include any confidential business or personal information. This includes your social security number which should never be provided to BEA via any method of transmission.

### Part I - Identification of U.S. Affiliate

#### **IMPORTANT**

Review the instructions starting on page 11 before completing this form. **Insurance and real estate companies** — See special instructions on page 16.

- Accounting principles If feasible, use U.S. Generally Accepted Accounting Principles (U.S. GAAP) to complete Form BE–15 unless you are requested to do otherwise by a specific instruction. References in the instructions to Financial Accounting Standards Board Accounting Standards Codification Topics are referred to as "FASB ASC."
- U.S. affiliate's 2024 fiscal year The affiliate's financial reporting year that had an ending date in calendar year 2024.
- Consolidated reporting A U.S. affiliate must file on a fully consolidated domestic U.S. basis, including in the consolidation ALL U.S. business enterprises proceeding down each ownership chain whose voting securities are more than 50 percent owned by the U.S. business enterprise above. Consolidation rules are found in instruction IV.2 on page 14.
- Rounding Report currency amounts in U.S. dollars rounded to thousands (omitting 000).

  Do not enter amounts in the shaded portions of each item.

  Example If amount is \$1,334,891.00 report as:

  1 335
- 1 Which financial reporting standards will you use to complete this BE-15 report?

NOTE — The BE-15 report should be completed using U.S. Generally Accepted Accounting Principles. If using U.S. GAAP to complete this report is highly burdensome, or otherwise not feasible, you may use other financial reporting standards, preferably with adjustments to correct for any material differences between U.S. GAAP and the reporting standards used.

<sup>1399</sup> <sup>1</sup>1 U.S. Generally Accepted Accounting Principles

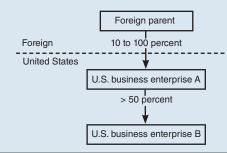
- International Financial Reporting Standards (as promulgated by, or adapted from, the International Accounting Standards Board)
  NOTE Do not prepare your BE–15 report using the proportionate consolidation method.
- <sup>1</sup>3 Other reporting standards Specify the reporting standards used
- Is more than 50 percent of the voting interest in this U.S. business enterprise owned by another U.S. affiliate of the foreign parent (see the diagram)?

1400 1 1 Yes If "Yes" — Do not complete this report unless exception IV.2.c. described in the consolidation rules apply. This exception states that a U.S. affiliate in which a direct ownership interest and an indirect ownership interest are held by different foreign persons should not be fully consolidated into another U.S. affiliate, but must complete and file its own Form BE-15 report. See diagram on page 14 for an illustration of this exception.

If this exception does not apply, forward the BE-15 notification to file to the U.S. business enterprise owning your company more than 50 percent, and notify BEA of the action taken by filing BE-15 Claim for Exemption with item 2(c) completed on page 3 of that form. The BE-15 Claim for Exemption can be accessed through eFile or downloaded from BEA's Web site at: <a href="https://www.bea.gov/fdi.

<sup>1</sup>2 No If "No" — Complete this report in accordance with the consolidation rules on page 14.

### **CONSOLIDATION OF U.S. AFFILIATES**



U.S. business enterprise B should be consolidated on the BE–15 report for U.S. business enterprise A because U.S. business enterprise B is more than 50 percent owned by U.S. business enterprise A.

3 Enter Employer Identification Number(s) used by the U.S. affiliate to file income and payroll taxes.

	Primary	Other
1006	1	2
	-	-
		_

In which state was the U.S. affiliate located?

In which state was the U.S. affiliate located?

BEA USE ONLY

0700 0

1

If the U.S. affiliate operates in more than one state, then select the state where the greatest number of employees was based at the end of the fiscal year ending in 2024. If there were no employees and no physical location, then select the state of incorporation.

-	<b>Period</b> — Reporting period instructions are found in instruction 5 on page 14. If there was <b>in fiscal year</b> , review instruction 5.b. on page 14.	1007	Month 1	Day	Year							
This U.S.	uffiliate's fiscal year ended in <b>calendar year 2024</b> on											
Example	If the fiscal reporting year ended on March 31, report for the 12-month period ended March 3	1, 2024	1.									
NOTE — Affiliates with a fiscal year that ended within the first week of January 2025 are considered to have a 2024 fiscal year and should report December 31, 2024 as their 2024 fiscal year end.												
	·		Month	Day	Year							
1008 1 1			1									
12	No											
a full 12 r	onths of operations. All U.S. business enterprises that become a new affiliate are also required to											
on voting	nterest should be fully consolidated in this report, except as noted in the consolidation rules star											
affiliate. It	he report is for a single U.S. business enterprise, enter "1" in the box below. Exclude from the co											
1012 1												
	If the number is greater than one, complete Supplement A on page 8.											
II C ~###	too NOT fully concellidated. Conjunt vision 0 starting on page 14											
		ed in th	nis report									
1013 1	If number is not zero, complete Supplement B on page 9.											
	is at least 20 percent. If less than 20 percent, report the ownership interest in accordance w affiliate named on page 1 also must notify any unconsolidated U.S. affiliates of their obligation names. See page 12 to determine the appropriate form for these affiliates to file.											
	1 3											
	This U.S. a  Example NOTE A  Did the U.  year 2024  1008 1 1  12  NOTE A  a full 12 m  and copies  U.S. busin on voting in instruction Enter the r  affiliate. If these enter  11  12  U.S. affilian  Number of	This U.S. affiliate's fiscal year, review instruction 5.b. on page 14.  This U.S. affiliate's fiscal year ended in calendar year 2024 on	This U.S. affiliate's fiscal year ended in calendar year 2024 on	This U.S. affiliate's fiscal year ended in calendar year 2024 on	a change in fiscal year, review instruction 5.b. on page 14.  This U.S. affiliate's fiscal year ended in calendar year 2024 on							

OWNERSHIP — Enter percent of ownership in this U.S. affiliate, to a tenth of one percent, based on voting interest (or an equivalent interest if an unincorporated affiliate). "Voting interest" is defined in instruction 9.a(1) on page 15.

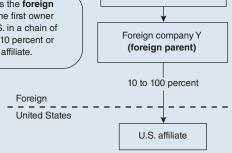
Foreign parent — A foreign parent is the FIRST person or entity outside the U.S. in a chain of ownership that has a 10 percent or more voting interest (direct or indirect) in this U.S. affiliate. The country of foreign parent is the country of incorporation or organization if the parent is a business enterprise, or of residence if the parent is an individual or government. For individuals, see instruction 9.b on page 15.

	On water of	Voting	interest	BEA								
Name of each direct owner	Country of foreign parent	Close FY 2024 (1)	Close FY 2023 (2)	USE ONLY								
Ownership held directly by foreign parent(s) of this affiliate—see example 1 below.  Enter name and country of each foreign parent with direct ownership and the country of the foreign parent—if more than 2, continue on next page.												
9	1017	1%	2%	3								
10	1018	1%	2%	3								
	Ownership held directly by all U.S. affiliates of the foreign parent(s) — see example 2 below.  Enter name of each U.S. affiliate that owns this affiliate and the country of the foreign parent — if more than 2, continue on next page.											
	1063	1%	2%	3								
12	1064	1%	2	3								
13 Direct ownership held by all other persons or entities (do not list names)	1061	1%	2%									
TOTAL — Sum of items 9 through 13		100%	100%									

### **EXAMPLES OF DIRECT AND INDIRECT FOREIGN OWNERSHIP**

### Example 1 - Ownership held directly by a foreign parent

Foreign company Y is the foreign parent because it is the first owner located outside the U.S. in a chain of ownership that owns 10 percent or more of the U.S. affiliate.



Foreign company X

### Example 2 - Ownership held directly by all U.S. affiliates of the foreign parent(s) Foreign parent 10 to 100 percent Foreign United States U.S. affiliate A U.S. affiliate B is indirectly owned by the foreign parent through U.S. affiliate A. U.S. U.S. affiliate B affiliate A has a direct ownership interest in U.S. affiliate B.

### **DIRECT FOREIGN PARENT OWNERSHIP-continued**

Use only if you need to enter more owners after item 10 on the previous page.	Voting in	iterest
Ownership held directly by foreign parent(s) of this U.S.  affiliate — Give name of each foreign parent with direct ownership.	Close FY 2024 (1)	Close FY 2023 (2)
1019	%	%
1020	1%	%
1021	1%	%
1022	1%	%
1023	1%	%
1024	1%	%
1025	1%	%
1026	1%	%

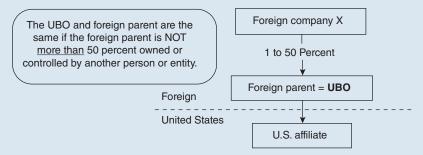
### INDIRECT FOREIGN PARENT OWNERSHIP-continued

Use only if you need to enter more owners after item 12 on the previous page.	Voting i	nterest
Ownership held indirectly by foreign parent(s) of this U.S. affiliate through another U.S. affiliate — Give name of each foreign parent with indirect ownership.	Close FY 2024	Close FY 2023
1065	(1)	(2)
1005	%	%
1066	1%	2%
1067	1%	%
1068	1%	%
1069	1%	<sup>2</sup> %
1070	%	2%
1071	%	2%
1072	. %	. %

i		ter the name, industa a separate sheet.	stry code and city of the fo	reign parent. If there is mo	re than one foreign parent, I	ist each and its industry co	ode
E	4a Er	nter name of foreig	n parent. If the foreign pare	nt is an individual, enter "inc	ividual."		
	30	11 0					
E	SI for	NGLE entity named	de of the foreign parent fro l as the foreign parent. DO No preign parent is an individual	IOT base the code on the wo			
	30		vnership type: Direct	Indirect			
Ē		•	corporation of the foreign ent entity (enter N/A).	parent named in 14a? Do	O NOT report the city of resi	dence if the foreign parent	is an
	302	0					
•		f there is more than	<b>nt</b> , furnish the name, countr one foreign parent, list each				
	has		or entity, proceeding up the ent direct voting interest. <b>No</b> thay be a UBO.				
ı		s the foreign paren ne foreign parent is I	t also the UBO? If the foreign NOT the UBO.	gn parent is owned or contro	olled more than 50 percent b	y another person or entity	then
	30	<sup>019</sup> 1 <b>Yes</b> (exam	ple 1 on page 6) – Skip to 1	5e.			
		<sup>1</sup> 2 <b>No</b> (examp	oles 2A and 2B on page 6) -	Continue with 15b.			
E			he UBO of the foreign pare on page 13 for the definition				
	30	21 0					
E			ich the UBO is incorporate nment. For individuals, see i		ess enterprise, or is reside		A USE ONLY
	30	22 0				3022 1	
E			ncorporation of the UBO n	amed in 15b? DO NOT re	port the city of residence if t	the UBO is an individual or	
		overnment entity (e	nter N/A).				
E			code of the UBO from the list ldwide sales of the UBO, inc			t reflects	
	30	023 1					
				BEA USE ONLY			
1200	1		2	3	4	5	
1201	1		2	3	4	5	
1202	1		2	3	4	5	
1203	1		2	3	4	5	

#### **EXAMPLES OF THE ULTIMATE BENEFICIAL OWNER (UBO)**

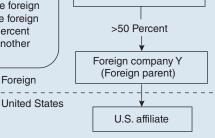
### Example 1 - The UBO and foreign parent are the same



### Examples 2A and 2B - The foreign parent is NOT the UBO

#### A. The UBO is a foreign person or entity

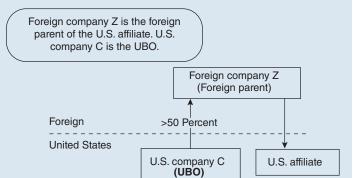
Foreign company Y is the foreign parent of the U.S. affiliate; foreign company X is the UBO. The foreign parent is not the UBO if the foreign parent is more than 50 percent owned or controlled by another person or entity.



Foreign company X

(UBO)

### B. The UBO is a U.S. person or entity



### FOREIGN PARENT AND UBO INDUSTRY CODES

Note: "ISI codes" are International Surveys Industry codes, as given in the *Guide to Industry Classifications for International Surveys, 2022.*See the Summary of Industry Classifications on page 10.

- **01** Government and government-owned or -sponsored enterprise, or quasi-government organization or agency
- 02 Pension fund Government run
- 03 Pension fund Privately run
- 04 Estate, trust, or nonprofit organization
- 05 Individual

## Private business enterprise, investment organization, or group engaged in:

- 06 Insurance (ISI codes 5242, 5243, 5249)
- **07** Agriculture, forestry, fishing and hunting (ISI codes 1110–1140)
- 08 Mining (ISI codes 2111-2127)
- 09 Construction (ISI codes 2360-2380)
- 10 Transportation and warehousing (ISI codes 4810-4939)
- 11 Utilities (ISI codes 2211-2213)
- 12 Wholesale and retail trade (ISI codes 4231-4596)
- 13 Banking, including bank holding companies (ISI codes 5221 and 5229)
- 14 Holding companies, excluding bank holding companies (ISI codes 5512 and 5513)
- 15 Other finance (ISI codes 5223, 5224, 5231, 5238, that part of ISI code 5252 that is not estates and trusts, and ISI code 5331)
- 16 Real estate (ISI code 5310)

- 17 Information (ISI codes 5121-5192)
- **18** Professional, scientific, and technical services (ISI codes 5411–5419)
- **19** Other services (ISI codes 1150, 2132, 2133, 5321, 5329, and 5611–8130)

## Manufacturing, including fabricating, assembling, and processing of goods:

- 20 Food (ISI codes 3111-3119)
- 21 Beverages and tobacco products (ISI codes 3121 and 3122)
- 22 Pharmaceuticals and medicine (ISI code 3254)
- 23 Other chemicals (ISI codes 3251-3259, except 3254)
- 24 Nonmetallic mineral products (ISI codes 3271-3279)
- 25 Primary and fabricated metal products (ISI codes 3311–3329)
- 26 Computer and electronic products (ISI codes 3341–3346)
- 27 Machinery (ISI codes 3331-3339)
- 28 Electrical equipment, appliances and components (ISI codes 3351–3359)
- 29 Motor vehicles and parts (ISI codes 3361-3363)
- 30 Other transportation equipment (ISI codes 3364–3369)
- 31 Other manufacturing (ISI codes 3130–3231, 3261, 3262, 3370–3399)
- 32 Petroleum manufacturing, including integrated petroleum and petroleum refining without extraction (ISI codes 3242–3244)

## Part II - Financial and Operating Data of U.S. Affiliate

16	What is (are) the major product(s) and/or service(s) of the ful done to it, i.e., whether it is mined, manufactured, sold at wholesa											
	1163 0											
17	Industry of this affiliate – Enter the 4-digit International Surveys in which the U.S. affiliate had the largest sales or gross operating		le of the industry	IS	SI Code							
	See the Summary of Industry Classifications on page 10; for a ful to Industry Classifications for International Surveys, 2022 located	explanation of ea		1164 1								
18	Sales or gross operating revenues, excluding sales taxes – R and discounts. Exclude sales or consumption taxes levied directly directly on manufacturers, wholesalers, and retailers. Include reve OPERATIONS of a discontinued business segment, but exclude of discontinued operations.	\$ Bil. 2149 1	Mil. Thous	. Dols.								
	NOTE - Holding Companies (ISI code 5512) should report total income in this item including income (loss) from equity investments in unconsolidated U.S. and foreign entities, other income, plus sales and gross operating revenues, if any.  Zero normally is NOT a correct entry for this item.											
	ANCE SHEET	11.1		. Palana al III alcada a	-11							
	E – Foreign operations of the U.S. affiliate, including those in which ensolidated foreign operations using the equity method.	it nas a majority	interest, are to be unconso	olidated. Include	all							
	Close FY 2024 \$ Bil. Mil. Thous 2109 1	s. Dols.										
19 20	Total assets	000 1 3	Check box if total liabil	ities are zero.								
INC	OME AND EMPLOYMENT			\$ Bil.	Mil. Thou	us. Dols.						

INC	OME AND EMPLOYMENT		\$ Bil.	Mil.	Thous.	Dols.
21	Net income (loss) – After provision for U.S. Federal, state, and local income taxes	2159	1			000
21	Net income (ioss) – Aiter provision for 0.5. Federal, state, and local income taxes		Nur	nber of er	nployees	
22	Number of employees at close of FY 2024 – See instruction 22 on page 15 for information on reporting employment (including how to report when employment is subject to unusual variations)	2700	3			
		2253	\$ Bil. 1	Mil.	Thous.	Dols.
23	Employee compensation – Employee compensation is defined in instruction 23 on page 15	2397	1			000
24	Gross book value of all land and other property, plant, and equipment, at the close of FY 2024	2403	1			000
25	Research and development (R&D) expenditures for R&D performed BY the U.S. affiliate – R&D is defined in instruction 25 on page 15		'			000
		4000		A USE ON	NLY	
		1299				

	A BE-15 Supple	ment A (202	U.S. DEPARTMENT OF CON BUREAU OF ECONOMIC A			BEA USE ONLY		Pag	ge nun	nber	
(IILV		USINESS ENTERPR	ISES FULLY CONSOLIDATED INTO THE REPORTING U.S. AFFIL	.IATE		Name of U.S. affilia	ate as shown on page 1				
NOT	NOTE – If you filed a Supplement A or a computer printout of Supplement A with your 2023 BE-15 report, in lieu of completing a new Supplement A, you may substitute a copy of that Supplement A or computer printout that has been updated to show any additions, deletions, or other changes.										
			iliate that consolidates financial and operating data of any other U.S enterprises listed below plus the reporting U.S. business enterprise			B: 5 1 11 11		E110 .			
agree	with item 7 on page 3	3. Continue listing onto	as many additional pages as necessary.			in item 3 on page 2.	ication Number as shown	5110	<u> </u>	-	
	If the affiliate has changed since last report, please select the reason. If it is new, please select the corresponding "new" transaction type	If affiliate is new since last report, please enter the date the U.S. business enterprise was acquired or established	Name of each U.S. business enterprise consolidated (as represented in item 7 on page 3)  (1)	Numb	oer	yer Identification used to file income I payroll taxes (2)	Name of U.S. business e holds the direct ownershi U.S. affiliate listed in (3)	p inte	rest in		Percent of direct voting ownership that the entity named in column 3 holds in the entity named in column 1. - Enter percent to nearest tenth (4)
6 5111		7	2	3	-		4				5 . %
6 5112		7	2	3	_		4				5 . %
6 5113		7	2	3	_		4				5 . %
6		7	2	3	_		4				5
5114		7	2	3	_		4				. %
5115 6		7	2	3	_		4				. %
5116 6		7	2	3	_		4				. %
5117		7	2	3	_		4				. %
5118		7	2	3	_		4				. %
5119		7	2	3	_		4				. %
5120					_						. %
5121		/	2	3	-		4				5 . %
5122		7	2	3	-		4				5 . %
6 5123		7	2	3	-		4				5 . %
6 5124		7	2	3	-		4				5 . %
6 5125		7	2	3	-		4				5 . %
6 5126		7	2	3	-		4				5 . %
6 5127		7	2	3	-		4				5 . %
6 5128		7	2	3	-		4				5 . %
6 5129		7	2	3	-		4				5 . %
6 5130		7	2	3	-		4				5 . %
6 5131	<u> </u>	I	I				I.				1 /2
6		ŀ	f you need to file more lines, use the separate o	verfl∩	w s	Supplement Exc	cel file provided on our	weh	site		
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FORM BE-15C (REV 10/2024)

ORM <b>BE-15</b>	<b>Supplement</b>	В	(2024)	
DEV/ 10/0004\				

U.S. DEPARTMENT OF COMMERCE BUREAU OF ECONOMIC ANALYSIS BEA USE ONLY Page number

LIST OF ALL U.S. AFFILIATES IN WHICH THE REPORTING AFFILIATE (AS CONSOLIDATED) HAS A DIRECT OWNERSHIP INTEREST BUT WHICH ARE NOT FULLY CONSOLIDATED

NOTE – If you filed a Supplement B or a computer printout of Supplement B with your 2023 BE-15 report, in lieu of completing a new Supplement B you may substitute a copy of that Supplement B or computer printout that has been updated to show any additions, deletions, or other changes.

Supplement B must be completed by a reporting affiliate which files a BE-15C and has a direct ownership interest in a U.S. affiliate(s) which is (are) not fully consolidated. The number of U.S. affiliates listed below must agree with item 8 on page 3. Continue listing onto as many additional pages as necessary.

Name of U.S. affiliate as shown on page 1

consolida	ated. The number of	U.S. affiliates listed be	elow must agree with item 8 on page 3. Continue listin	interest in a 0.5. animate(s) which is (are) not fully ig onto as many additional pages as necessary.		
BEA USE ONLY	If the affiliate has changed since last report, please select the reason. If it is new, please select the corresponding "new" transaction type	If affiliate is new since last report, please enter the date the U.S. business enterprise was acquired or established	Name of each U.S. affiliate in which a direct interest is held but that is not listed in Supplement A	Address Provide number, street, city, state, and ZIP Code	Employer Identification Number used to file income and payroll taxes	Percent of direct voting ownership interest that the fully consolidated U.S. business enterprise named on page 1, holds in the entity named in column 1.  - Enter percent to nearest tenth.
7	type	4	(1)	(2)	(3)	(4)
,		4	2	S S	3	
6211					_	. %
7		4	2	3	5	6
					-	
6212					-	. %
7		4	2	3	5	6
					-	
6213					_	. %
7		4	2	3	5	6
					-	
6214					_	• %
7		4	2	3	5	6
					-	
6215					_	• %
7		4	2	3	5	6
					<u> </u>	. %
6216		4	2	3	5	6
,		4	2	S S	3	0
001=					1 -	. %
6217		4	2	3	5	6
6218					_	. %
7		4	2	3	5	6
					_	
6219					-	. %
7		4	2	3	5	6
					_	
6220					_	. %
7		4	2	3	5	6
					-	
6221					_	. %
				0		

Affiliate ID

### **BE-15C Summary Form**

Item	Data Item	Line	Col 1			Col 2		Col 3	Col 4
1	Financial reporting standards	1399	GAAP	IF	RS	Other			
2	Is more than 50% voting rights	1400	Yes	No					
3	EIN Number(s)	1006							
4	State	0700							
5	Reporting Period	1007							
6	Aff is a new affiliate	1008	Yes	No	1009				
7	# of US consolidated businesses	1012							
8	# of US unconsolidated entities	1013							
9	Ownership directly held by FP	1017							
10	Ownership directly held by FP	1018							
11	Directly owned by US Aff of FP	1063							
12	Directly owned by US Aff of FP	1064							
13	Directly owned by other persons	1061							
14a	Name of foreign parent	3011							
14b	Industry of foreign parent (FP)	3018				Direct	Indirect		
14c	City where FP incorporated	3024							
15a	Foreign parent also UBO? Y/N	3019	Yes	No					
15b	Name of UBO of the FP	3021							
15c	Country where UBO incorporated	3022							
15d	City where UBO incorporated	3025							
15e	Industry of UBO	3023							
16	Major product(s)/srvc(s) of US aff	1163							
17	Industry of this Affiliate	1164							
18	Sales/Gross Operating Revenues	2149							
19	Total assets	2109							
20	Total Liabilities	2114						Checked if	total liabilities are zero
21	Net Income (loss)	2159							
22	Number of employees at close of 2023	2700							
23	Employee compensation	2253							
24	Gross book value Land/Other PPE	2397							
25	R & D expenditures	2403							
	BEA USE ONLY - Industry of Aff	1299							

Note: The line items on this summary page have been abbreviated. For a full description please refer to the survey form.

### Summary of Industry Classifications - For a full explanation of each code see www.bea.gov/naics 2022

Agriculture,	Forestry,	Fishing,	and	Hunting
--------------	-----------	----------	-----	---------

1110 Crop production

Animal production and aquaculture 1120

1130

Forestry and logging
Fishing, hunting, and trapping 1140

Support activities for agriculture and forestry 1150

### Mining

2111 Oil and gas extraction

2121 Coal

Nonmetallic minerals 2123

2124 Iron ores

2125 Gold and silver ores

2126 Copper, nickel, lead, and zinc ores

2127 Other metal ores

Support activities for oil and gas operations 2132

Support activities for mining, except 2133 for oil and gas operations

#### Utilities

2211 Electric power generation, transmission, and distribution

2212 Natural gas distribution

2213 Water, sewage, and other systems

#### Construction

2360

Construction of buildings Heavy and civil engineering construction 2370

Specialty trade contractors 2380

#### Manufacturing

Animal food manufacturing 3111

3112 Grain and oilseed milling

Sugar and confectionery products Fruit and vegetable preserving and specialty foods 3113

3114

3115 Dairy products

3116 Meat products

3117 Seafood product preparation and packaging Bakeries and tortilla manufacturing 3118

3119 Other food products

3121 Beverages

Tobacco 3122

3130 Textile mills

Textile product mills 3140

3150 Apparel

3160 Leather and allied products

3210 Wood products

3221 Pulp, paper, and paperboard mills 3222

Converted paper products
Printing and related support activities
Integrated petroleum refining and extraction 3231

3242 Petroleum refining without extraction 3243

3244 Asphalt and other petroleum and

coal products

Basic chemicals 3251

Resins, synthetic rubbers, and artificial 3252 and synthetic fibers and filaments

3253 Pesticides, fertilizers, and other

agricultural chemicals Pharmaceuticals and medicines

3254 3255 Paints, coatings, and adhesives

3256 Soap, cleaning compounds, and

toilet preparations

Other chemical products and preparations 3259

3261 Plastics products 3262 Rubber products

3271 Clay products and refractories

3272 Glass and glass products

3273 Cement and concrete products

Lime and gypsum products
Other nonmetallic mineral products 3274

3279

Iron and steel mills 3311

3312 Steel products from purchased steel

3313 Alumina and aluminum production and processing
Nonferrous metal (except aluminum)

3314

production and processing

Foundries

3315 3321

Forging and stamping Cutlery and hand tools 3322

Architectural and structural metals 3323

Boilers, tanks, and shipping containers 3324

3325 Hardware

Spring and wire products 3326

Machine shop products, turned products, and screws, nuts, and bolts 3327

Coating, engraving, heat treating, 3328 and allied activities

Other fabricated metal products 3329

Agriculture, construction, and mining machinery 3331

3332 Industrial machinery 3333

Commercial and service industry machinery

Ventilation, heating, air-conditioning, 3334

and commercial refrigeration equipment

3335 Metalworking machinery 3336 Engines, turbines, and power

transmission equipment

3330 Other general purpose machinery 3341

Computer and peripheral equipment Communications equipment 3342

3343 Audio and video equipment 3344 Semiconductors and other

electronic components

3345 Navigational, measuring, electromedical,

and control instruments
Manufacturing and reproducing 3346 magnetic and optical media

3351 Electric lighting equipment Household appliances

3352 Electrical equipment 3353

3359 Other electrical equipment and components

Motor vehicles 3361

Motor vehicle bodies and trailers 3362

3363 Motor vehicle parts

Aerospace products and parts Railroad rolling stock 3364

3365 3366

Ship and boat building 3369 Other transportation equipment Furniture and related products

3370 Medical equipment and supplies 3391 3399 Other miscellaneous manufacturing

#### Wholesale Trade, Durable Goods

Motor vehicles and motor vehicle parts and 4231

supplies

4232 Furniture and home furnishing

4233 Lumber and other construction materials 4234 Professional and commercial

equipment and supplies

4235 Metal and mineral (except petroleum) 4236 Household appliances, and electrical and

electronic goods Hardware, and plumbing and heating 4237

equipment and supplies
Machinery, equipment, and supplies
Miscellaneous durable goods 4238

### 4239

Wholesale Trade, Nondurable Goods

4241

Paper and paper product
Drugs and druggists' sundries
Apparel, piece goods, and notions
Grocery and related product 4242

4243 4244

Farm product raw material Chemical and allied products 4245

4246 4247 Petroleum and petroleum products

4248 Beer, wine, and distilled alcoholic beverage

#### 4249 Miscellaneous nondurable goods Wholesale Trade, Electronic Markets

and Agents And Brokers 4251 Wholesale trade agents and brokers

### **Retail Trade**

4410 Motor vehicle and parts dealers

4440 Building material and garden equipment and supplies dealers

4450 Food and beverage retailers 4491

Furniture and home furnishings retailers Electronics and appliance retailers 4492

4550 General merchandise retailers 4561 Health and personal care retailers

4571 Gasoline stations

Fuel dealers

Clothing, clothing accessories, shoe, and jewelry 4580 retailers

4591 Sporting goods, hobby, and musical instrument

retailers Book retailers and news dealers 4592

4596 Miscellaneous retailers

### **Transportation and Warehousing**

Air transportation 4810

Rail transportation
Petroleum tanker operations 4821 4833

4839 Other water transportation

4840 Truck transportation

4850

Transit and ground passenger transportation Pipeline transportation of crude oil, 4863

refined petroleum products, and natural gas

4868 Other pipeline transportation Scenic and sightseeing transportation 4870

4880 Support activities for transportation

Couriers and messengers 4920 Petroleum storage for hire 4932

Other warehousing and storage

### Information

5121

5122

Motion picture and video industries Sound recording industries Newspaper, periodical, book, and directory publishers

5132

5161

Software publishers
Radio and television broadcasting stations
Media streaming distribution services, social networks,

and other media networks and content providers Wired and wireless telecommunications (except

Satellite telecommunications 5174

All other telecommunications 5178

Computing infrastructure providers, data processing, 5182

web hosting, and related services Web search portals, libraries, archives, and other information services

### Finance and Insurance

5221

Depository credit intermediation (Banking) Activities related to credit intermediation

5223 Non-depository credit intermediation, except 5224

branches and agencies 5229

Nondepository branches and agencies 5231 Securities and commodity contracts intermediation and brokerage

Other financial investment activities and 5238 exchanges

5242 Agencies, brokerages, and other insurance related activities
Insurance carriers, except direct life insurance carriers

5243

5249 Direct life insurance carriers Funds, trusts, and other finance vehicles

### Real Estate and Rental and Leasing

5310 Real estate

5321 Automotive equipment rental and leasing

Other rental and leasing services 5331 Lessors of nonfinancial intangible assets, except copyrighted works

### Professional, Scientific, and Technical Services

5418

Legal services 5412 Accounting, tax preparation, bookkeeping,

and payroll services 5413

Architectural, engineering, and related services Specialized design services 5414

5415 Computer systems design and related services 5416 Management, scientific, and technical consulting

services Scientific research and development services 5417

5419 Other professional, scientific, and technical services

**Management of Companies and Enterprises** Holding companies, except bank holding companies

Advertising, public relations, and related services

### Corporate, subsidiary, and regional management offices

### Administrative and Support, Waste

**Management, and Remediation Services** 5611 Office administrative services

Facilities support services 5612

Employment services 5613

Business support services 5614

5615 Travel arrangement and reservation services 5616 Investigation and security services

Services to buildings and dwellings 5617 5619 Other support services

### Waste management and remediation services

**Educational Services** 

### 6110 Educational services

**Health Care and Social Assistance** 6210

Ambulatory health care services Hospitals 6220

6230 Nursing and residential care facilities Social assistance services

Arts, Entertainment, and Recreation

Amusement, gambling, and recreation industries

7110 Performing arts, spectator sports, and related industries Museums, historical sites, and similar institutions

Religious, grantmaking, civic, professional,

### **Accommodation and Food Services**

7210 Accommodation

7220 Food services and drinking places

### **Other Services**

6240

8110 Repair and maintenance Personal and laundry services 8120

and similar organizations

#### **Public Administration** 9200 Public administration

## 2024 ANNUAL SURVEY OF FOREIGN DIRECT INVESTMENT IN THE UNITED STATES BE-15C INSTRUCTIONS

NOTE: Instructions in section IV are cross-referenced by number to the items located on pages 2 to 9.

**Authority** – This survey is being conducted pursuant to the International Investment and Trade in Services Survey Act (P.L. 94-472., 90 Stat. 2059, 22 U.S.C. 3101-3108, as amended, hereinafter "the Act"), and the filing of reports is MANDATORY pursuant to Section 5(b) (2) of the Act (22 U.S.C. 3104).

A response is required from persons (in the broad sense, including companies) subject to the reporting requirements of the BE-15 survey. Also, persons contacted by BEA concerning their being subject to reporting, either by sending them a report form or by written inquiry, must respond pursuant to section 801.3 of 15 CFR, pt. 801 and the survey instructions. This may be accomplished by completing and submitting Form BE-15A, BE-15B, BE-15C, or the BE-15 Claim For Exemption, whichever is applicable, **by May 31, 2025.** 

**Penalties** – Whoever fails to report shall be subject to a civil penalty and to injunctive relief commanding such person to comply, or both. Whoever willfully fails to report shall be fined and, if an individual, may be imprisoned for not more than one year, or both. Any officer, director, employee, or agent of any corporation who knowingly participates in such violations, upon conviction, may be punished by a like fine, imprisonment or both (22 U.S.C. 3105). The civil penalties are subject to inflationary adjustments. Those adjustments are found in 15 C.F.R. 6.3.

Notwithstanding any other provision of the law, no person is required to respond to, nor shall any person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act, unless that collection of information displays a currently valid OMB Control Number. The control number for this survey is at the top of page 1.

**Respondent Burden** – Public reporting burden for this BE-15C form is estimated to vary from 1 to 3 hours per response, with an average of 2.25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Director, Bureau of Economic Analysis (BE-1), U.S. Department of Commerce, 4600 Silver Hill Road, Washington, DC 20233; and to the Office of Management and Budget, Paperwork Reduction Project 0608-0034, Washington, DC 20503.

**Confidentiality** – The Act provides that your report to this Bureau is CONFIDENTIAL and may be used only for analytical or statistical purposes. Without your prior written permission, the information filed in your report CANNOT be presented in a manner that allows it to be individually identified. Your report CANNOT be used for purposes of taxation, investigation, or regulation. Copies retained in your files are immune from legal process. Per the Cybersecurity Enhancement Act of 2015, your data are protected from cybersecurity risks through secure monitoring of the BEA information systems.

### I. REPORTING REQUIREMENTS

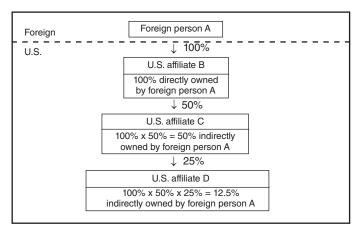
A. Who must report – A BE-15 report is required for each U.S. affiliate, i.e., for each U.S. business enterprise in which a foreign person or entity owned or controlled, directly or indirectly, 10 percent or more of the voting securities if an incorporated U.S. business enterprise, or an equivalent interest if an unincorporated U.S. business enterprise, at the end of the business enterprise's fiscal year that ended in calendar year 2024. Certain private funds may be exempt from filing; see item 2(d) of the BE-15 Claim for Exemption for more information.

**Foreign ownership interest** – All direct and indirect lines of ownership held by a foreign person in a given U.S. business enterprise must be summed to determine if the enterprise is a U.S. affiliate of the foreign person for purposes of reporting.

**Indirect ownership interest in a U.S. business enterprise** is the product of the direct ownership percentage of the foreign parent in the first U.S. business enterprise in the ownership chain multiplied by that first enterprise's direct ownership percentage in

the second U.S. business enterprise multiplied by each succeeding direct ownership percentage of each other intervening U.S. business enterprise in the ownership chain between the foreign parent and the given U.S. business enterprise.

**Example:** In the diagram below, foreign person A owns 100% of the voting stock of U.S. affiliate B; U.S. affiliate B owns 50% of the voting stock of U.S. affiliate C; and U.S. affiliate C owns 25% of the voting stock of U.S. affiliate D. Therefore, U.S. affiliate B is 100% directly owned by foreign person A; U.S. affiliate C is 50% indirectly owned by foreign person A; and U.S. affiliate D is 12.5% indirectly owned by foreign person A.



A report is required even if the foreign person's voting interest in the U.S. business enterprise was established or acquired during the reporting period.

Beneficial, not record, ownership is the basis of the reporting criteria. Voting securities, voting stock, and voting interest all have the same general meaning and are used interchangeably throughout these instructions and the report forms.

**Airline and ship operators –** U.S. stations, ticket offices, and terminal and port facilities of foreign airlines and ship operators that provide services ONLY to the foreign airlines' and ship operators' own operation are not required to report. Reports are required when such enterprises produce significant revenues from services provided to unaffiliated persons.

**Agencies and representative offices** – U.S. representative offices, agents and employees of a foreign person or entity that meet the criteria outlined below are not considered to be U.S. affiliates, and therefore, they should not be reported on Forms BE-15A, BE-15B, or BE-15C. However, a foreign person's or entity's disbursements to maintain U.S. sales and representative offices must be reported on Form BE-125, Quarterly Survey of Transactions in Selected Services and Intellectual Property with Foreign Persons. Copies of Form BE-125 are available on BEA's Web site at: <a href="https://www.bea.gov/ssb">www.bea.gov/ssb</a>

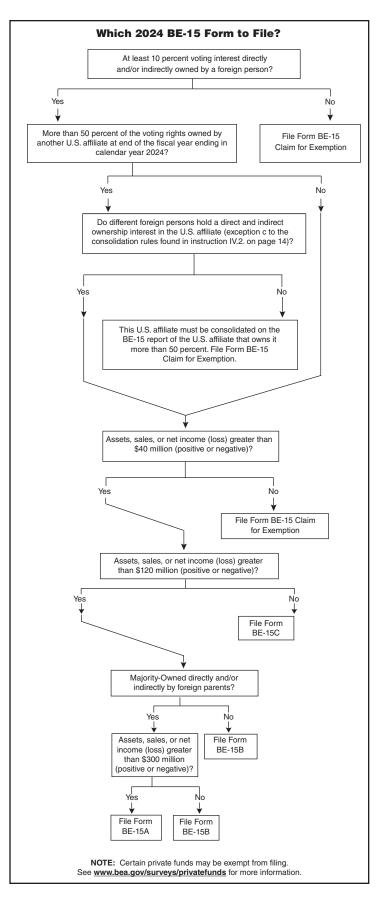
A U.S. presence of a foreign person or entity (or their representative(s)) is considered a U.S. sales promotion or representative office if:

- It is engaged only in sales promotion, representational activities, public relations activities, or the gathering of market information, on behalf of the foreign person or entity;
- 2. It does not produce revenue (other than funds from the foreign person or entity to cover its expenses); and
- **3.** It has minimal assets held either in its own name or the name of the foreign person or entity.

A U.S. presence of a foreign person or entity (or their representative(s)) that produces revenue for its own account from goods or services it provides to others is considered a U.S. affiliate and is subject to the BE-15 reporting requirements.

#### I. REPORTING REQUIREMENTS - Continued

1.	on th	ch form to file – Review the questions below and the flow chart is page to determine if your U.S. business is required to file the 5 survey. Blank forms can be found at: <a href="https://www.bea.gov/fdi">www.bea.gov/fdi</a>
	en	ere at least 10 percent of the voting rights in your business iterprise directly or indirectly owned by a foreign person or entity the end of your fiscal year that ended in calendar year 2024?
		Yes — Continue with question b.
		No — File Form BE-15 Claim for Exemption by May 31, 2025.
	en	ere more than 50 percent of the voting rights in this U.S. business aterprise owned by another U.S. affiliate at the end of this U.S. asiness enterprise's fiscal year that ended in calendar year 2024?
		Yes — Continue with question c.
		No — Skip to question d. NOTE: Your business is hereafter referred to as a "U.S. affiliate."
	ov to	o different foreign persons hold a direct and an indirect vnership interest in this U.S. business enterprise (exception c the consolidation rules)? (The consolidation rules are found in struction IV.2. on page 14.)
		Yes — Continue with question d. NOTE: Your business is hereafter referred to as a "U.S. affiliate."
		No — This U.S. business enterprise must be consolidated on the BE-15 report of the U.S. affiliate that owns it more than 50 percent. File Form BE-15 Claim for Exemption with page 1 and item (c) on page 3 completed by May 31, 2025.  Notify the U.S. affiliate that owns this affiliate more than 50 percent, and have them consolidate your data into their report.
	re <sup>v</sup> for	d <b>any one</b> of the items – Total assets, Sales or gross operating venues, or Net income (loss) – for the U.S. affiliate (not just the reign parent's share) exceed \$40 million at the end of, or for, its cal year that ended in calendar year 2024?
		Yes — Continue with question e.
		No — File Form BE-15 Claim for Exemption by May 31, 2025.
	re <sup>1</sup>	d <b>any one</b> of the items – Total assets, Sales or gross operating venues, or Net income (loss) – for the U.S. affiliate (not just the reign parent's share) exceed \$120 million at the end of, or for, its cal year that ended in calendar year 2024?
		Yes — Continue with question f.
		No — File Form BE-15C by May 31, 2025.
	at U. ov	as the U.S. affiliate <b>majority-owned</b> by its foreign parent(s) the end of its fiscal year that ended in calendar year 2024? (A S. affiliate is "majority-owned" if the combined direct and indirect wnership interests of <b>all</b> foreign parents of the U.S. affiliate ceed 50 percent.)
		Yes — Continue with question g.
		No — File Form BE-15B by May 31, 2025.
	re <sup>v</sup>	d <b>any one</b> of the items – Total assets, Sales or gross operating venues, or Net income (loss) – for the U.S. affiliate (not just the reign parent's share) exceed \$300 million at the end of, or for, its cal year that ended in calendar year 2024?
		Yes — File Form RF-15A by May 31, 2025



☐ No — File Form BE-15B by May 31, 2025.

#### I. REPORTING REQUIREMENTS - Continued

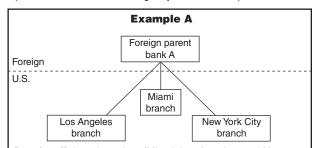
## 2. Who must file Form BE-15C - 2024 Annual Survey of Foreign Direct Investment in the United States?

Form BE-15C must be filed for a U.S. affiliate with total assets, sales or gross operating revenues, or net income greater than \$40 million (positive or negative) but not greater than \$120 million (positive or negative) if:

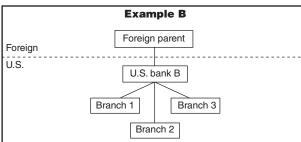
- (a) the affiliate has NOT filed a BE-12 or BE-15 for a fiscal year that ended BEFORE January 1, 2024; OR
- (b) the affiliate has been instructed in writing by BEA to file a BE-15 for the fiscal year that ended in calendar year 2024.
- B. Aggregation of real estate investments Aggregate all real estate investments in the United States of a foreign person for the purpose of applying the reporting criteria. Use a single report form to report the aggregate holdings, unless BEA has granted permission to do otherwise. Those holdings not aggregated must be reported separately. Real estate is discussed more fully in instruction V.B. on page 16.
- C. Aggregated reporting for banks All U.S. branches and agencies (including International Banking Facilities) directly owned by a foreign bank may be aggregated on a single BE-15.
  - U.S. branches and agencies, <u>directly owned by the foreign parent</u>, that are aggregated on this report should be counted separately and listed separately on the Supplement A to this form. See Example A below.

U.S. branches and agencies, <u>owned by a U.S. bank affiliate</u>, should be consolidated on this report but **not** counted separately and **not** listed separately on the Supplement A to this form. See Example B below.

Note that subsequent filings of Form BE-15 annual reports and Form BE-605 quarterly reports with BEA, if required, must be on the same aggregated basis. If all U.S. branches and agencies directly owned by a foreign bank are not aggregated on a single report, then each branch or agency must file a separate BE-15.



Data for **all** three branches (Miami, Los Angeles, and New York City) owned by Foreign parent bank A may be aggregated on a single BE-15. If aggregated, list **all** three branches on the Supplement A. Report "3" as the number of U.S. branches aggregated for item 7 on page 3.



Consolidate data for **each** branch (branch 1, branch 2, and branch 3) and U.S. bank B on a single BE-15. DO NOT list them on the Supplement A. Report "1" as number of U.S. affiliates consolidated for item 7 on page 3.

#### **II. DEFINITIONS**

A. United States, when used in a geographic sense, means the several States, the District of Columbia, the Commonwealth of Puerto Rico, and all territories and possessions of the United States.

- **B. Foreign,** when used in a geographic sense, means that which is situated outside the United States or which belongs to or is characteristic of a country other than the United States.
- C. Person, means any individual, branch, partnership, association, associated group, estate, trust, corporation, or other organization (whether or not organized under the laws of any state), and any government (including a foreign government, the U.S. Government, a state or local government, and any agency, corporation, financial institution, or other entity or instrumentality thereof, including a government sponsored agency).
- D. Associated group means two or more persons who, by the appearance of their actions, by agreement, or by an understanding, exercise their voting privileges in a concerted manner to influence the management of a business enterprise. The following are deemed to be associated groups:
  - 1. Members of the same family.
  - 2. A business enterprise and one or more of its officers or directors.
  - 3. Members of a syndicate or joint venture.
  - 4. A corporation and its domestic subsidiaries.
- E. Foreign person means any person resident outside the United States or subject to the jurisdiction of a country other than the United States.
- **F. Direct investment** means the ownership or control, directly or indirectly, by one person of 10 percent or more of the voting securities of an incorporated business enterprise or an equivalent interest in an unincorporated business enterprise.
- G. Foreign direct investment in the United States means the ownership or control, directly or indirectly, by one foreign person of 10 percent or more of the voting securities of an incorporated U.S. business enterprise or an equivalent interest in an unincorporated U.S. business enterprise, including a branch.
- H. Business enterprise means any organization, association, branch, or venture that exists for profit-making purposes or to otherwise secure economic advantage, and any ownership of any real estate.
- Branch means the operations or activities conducted by a person in a different location in its own name rather than through an incorporated entity.
- J. Affiliate means a business enterprise located in one country that is directly or indirectly owned or controlled by a person of another country to the extent of 10 percent or more of its voting securities for an incorporated business enterprise or an equivalent interest for an unincorporated business enterprise, including a branch.
- K. U.S. affiliate means an affiliate located in the United States in which a foreign person has a direct investment.
  - Majority-owned U.S. affiliate means a U.S. affiliate in which the combined direct and indirect voting interest of all foreign parents of the U.S. affiliate exceeds 50 percent.
  - Minority-owned U.S. affiliate means a U.S. affiliate in which the combined direct and indirect voting interest of all foreign parents of the U.S. affiliate is 50 percent or less.
- L. Foreign parent is a foreign person that directly or indirectly holds a voting interest of 10 percent or more in the U.S. affiliate. It is the first person outside the United States in a foreign chain of ownership, which has direct investment in a U.S. business enterprise, including a branch.
- M. U.S. corporation means a business enterprise incorporated in the United States.
- N. Intermediary means any agent, nominee, manager, custodian, trust, or any person acting in a similar capacity.
- O. Ultimate beneficial owner (UBO) is the person or entity, proceeding up the ownership chain beginning with and including the foreign parent, in which no other entity has more than 50 percent direct voting interest. Note: Stockholders of a closely or privately held corporation are normally considered to be an associated group and may be a UBO.
- P. Private Fund refers to the same class of financial entities defined by the Securities and Exchange Commission as private funds on Form PF: "any issuer that would be an investment company as defined in section 3 of the Investment Company Act of 1940 but for section 3(c)(1) or 3(c)(7) of ...[that] Act."

#### **III. GENERAL INSTRUCTIONS**

- A. Required information not available Make all reasonable efforts to obtain the information required for reporting. Answer every item except where specifically exempt. Indicate when only partial information is available.
- B. Estimates If actual figures are not available, provide estimates and label them as such. When items cannot be fully subdivided as required, provide totals and an estimated breakdown of the totals. Information necessary to complete some of the items on Form BE-15C may not be available from a company's customary accounting records. Precise answers for these items may present the respondent with a substantial burden beyond what is intended by BEA. Therefore, the answers may be reasonable estimates based upon the informed judgment of persons in the responding organization, sampling techniques, prorations based on related data, etc. However, the estimating procedures used should be consistently applied on all BEA surveys.
- C. Space on form insufficient When space on a form is insufficient to permit a full answer to any item, provide the required information on supplementary sheets, appropriately labeled and referenced to the item number on the form.

## IV. INSTRUCTIONS FOR SPECIFIC SECTIONS OF THE REPORT FORM

**NOTE:** Instructions in section IV are cross-referenced by number to the items located on pages 2 to 9.

#### **2** Consolidation Rules

**Consolidated reporting by the U.S. affiliate** – A U.S. affiliate must file on a fully consolidated **domestic** U.S. basis, including in the full consolidation all U.S. business enterprises proceeding down each ownership chain whose voting securities are more than 50 percent owned by the U.S. business enterprise above. The fully consolidated entity is considered one U.S. affiliate.

A foreign person holding real estate investments that are reportable on the BE-15 must aggregate all such holdings. See Instruction V.B. on page 16 for details.

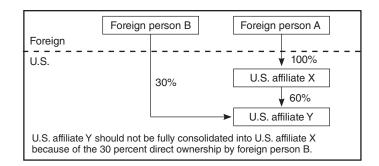
Do not prepare your BE-15 report using the proportionate consolidation method. Except as noted in IV.2.b. and c. below, consolidate all majority-owned U.S. business enterprises into your BE-15 report.

Unless the exceptions discussed below apply, any deviation from these consolidation rules must be approved in writing by BEA. If you file deconsolidated reports, you must file the same type of reports that would have been required if a consolidated report was filed.

Report majority-owned subsidiaries, if not consolidated, on the BE-15C using the equity method of accounting. DO NOT eliminate intercompany accounts (e.g., receivables or liabilities) for affiliates not consolidated.

**Exceptions to consolidated reporting** – Note: If a U.S. business enterprise is not consolidated into another U.S. affiliate's BE-15 report, then it **must** be listed on the Supplement B of the other U.S. affiliate's BE-15 report and each U.S. affiliate not consolidated **must** file its own Form BE-15.

- a. Do not consolidate foreign subsidiaries, branches, operations, or investments no matter what the percentage ownership. Include foreign holdings owned 20 percent or more using the equity method. DO NOT report employment, land, and other property, plant, and equipment and DO NOT eliminate intercompany accounts for holdings reported using the equity method. DO NOT list any foreign holdings of the U.S. affiliate on the Supplement B.
- b. Special consolidation rules apply to U.S. affiliates that are limited partnerships or that have an ownership interest in a U.S. limited partnership. These rules can be found on BEA's Web site at: www.bea.gov/help/faq/1011
- c. A U.S. affiliate in which a direct ownership interest and an indirect ownership interest are held by **different** foreign persons should not be fully consolidated into another U.S. affiliate, but must complete and file its own BE-15 report. (See diagram.)



If this exception applies, reflect the indirect ownership interest, even if more than 50 percent, on the owning U.S. affiliate's BE-15 report on an equity basis. For example, using the situation shown in the diagram above, U.S. affiliate X must treat its 60 percent ownership interest in U.S. affiliate Y as an equity investment.

**Seporting period** – The report covers the U.S. affiliate's 2024 fiscal year. The affiliate's 2024 fiscal year is defined as the affiliate's financial reporting year that had an ending date in calendar year 2024.

#### **Special Circumstances:**

a. U.S. affiliates without a financial reporting year – If a U.S. affiliate does not have a financial reporting year, its fiscal year is deemed to be the same as calendar year 2024.

#### b. Change in fiscal year

(1) New fiscal year ends in calendar year 2024 – A U.S. affiliate that changed the ending date of its financial reporting year should file a 2024 BE-15 report that covers the 12-month period prior to the new fiscal year end date. The following example illustrates the reporting requirements.

**Example 1:** U.S. affiliate A had a June 30, 2023 fiscal year end date but changed its 2024 fiscal year end date to March 31. Affiliate A should file a 2024 BE-15 report covering the 12-month period from April 1, 2023 to March 31, 2024.

(2) No fiscal year ending in calendar year 2024 – If a change in fiscal year results in a U.S. affiliate not having a fiscal year that ended in calendar year 2024, the affiliate should file a 2024 BE-15 report that covers 12 months. The following example illustrates the reporting requirements.

**Example 2:** U.S. affiliate B had a December 31, 2023 fiscal year end date but changed its next fiscal year end date to March 31. Instead of having a short fiscal year ending in 2024, affiliate B decides to have a 15-month fiscal year running from January 1, 2024 to March 31, 2025. Affiliate B should file a 2024 BE-15 report covering a 12-month period ending in calendar year 2024, such as the period from April 1, 2023 to March 31, 2024.

## 6 Reporting for a U.S. business that became a U.S. affiliate during fiscal year 2024 —

- a. A U.S. business enterprise that was newly established in fiscal year 2024 should file a report for the period starting with the establishment date up to and ending on the last day of its fiscal year that ended in calendar year 2024. DO NOT estimate amounts for a full year of operations if the first fiscal year is less than 12 months.
- b. A U.S. business enterprise existing before fiscal year 2024 that became a U.S. affiliate in fiscal year 2024 should file a report covering a full 12 months of operations.
- U.S. affiliates NOT consolidated Report investments in U.S. business enterprises that are not fully consolidated and that are owned 20 percent or more using the equity method of accounting. DO NOT report employment, land, and other property, plant, and equipment and DO NOT eliminate intercompany accounts (e.g., receivables or liabilities) for holdings reported using the equity method.

## IV. INSTRUCTIONS FOR SPECIFIC SECTIONS OF THE REPORT FORM-Continued

Report investments owned less than 20 percent at fair value, or your normal reporting practice, in accordance with FASB ASC 321.

List all U.S. affiliates in which this U.S. affiliate has a voting interest of at least 10 percent and that are not consolidated in this Form BE-15C on the Supplement B.

### 9 - 13 Ownership

### a. Voting interest and equity interest

- (1) Voting interest is the percent of ownership in the voting equity of the U.S. affiliate. Voting equity consists of ownership interests that have a say in the management of the company. Examples of voting equity include capital stock that has voting rights, and a general partner's interest in a partnership.
- (2) Equity interest is the percent of ownership in the total equity (voting and nonvoting) of the U.S. affiliate. Nonvoting equity consists of ownership interests that do not have a say in the management of the company. An example of nonvoting equity is preferred stock that has no voting rights.

**Voting interest and equity interest are not always equal.** For example, an owner can have a 100 percent voting interest in a U.S. affiliate but own less than 100 percent of the affiliate's total equity. This situation is illustrated in the following example.

**Example:** U.S. affiliate A has two classes of stock, common and preferred. There are 50 shares of common stock outstanding. Each common share is entitled to one vote and has an ownership interest in 1 percent of the total owners' equity amount. There are 50 shares of preferred stock outstanding. Each preferred share has an ownership interest in 1 percent of the total owners' equity amount but has no voting rights. Foreign parent B owns all 50 shares of the common stock. U.S. investors own all 50 shares of the preferred stock. Because foreign parent B owns all of the voting stock, foreign parent B has a 100 percent voting interest in U.S. affiliate A. However, because all 50 of the nonvoting preferred shares are owned by U.S. investors, foreign parent B has only a 50 percent interest in the owners' equity amount of U.S. affiliate A.

- b. Determining place of residence and country of jurisdiction of individuals – An individual is considered a resident of, and subject to the jurisdiction of, the country in which he or she is physically located. The following guidelines apply to individuals who do not reside in their country of citizenship.
  - (1) Individuals who reside, or expect to reside, outside their country of citizenship for less than one year are considered to be residents of their country of citizenship.
  - (2) Individuals who reside, or expect to reside, outside their country of citizenship for one year or more are considered to be residents of the country in which they are residing, except as provided in paragraphs (3) and (4) below.
  - (3) If an owner or employee of a business enterprise resides outside the country of location of the enterprise for one year or more for the purpose of furthering the business of the enterprise, and the country of the business enterprise is the country of citizenship of the owner or employee, then the owner or employee is considered a resident of the country of citizenship, provided there is the intent to return to the country of citizenship within a reasonable period of time.

(4) Individuals and members of their immediate family who are residing outside their country of citizenship as a result of employment by the government of that country - diplomats, consular officials, members of the armed forces, etc. - are considered to be residents of their country of citizenship.

### 22 Number of employees at close of FY 2024 -

Employment is the number of full-time and part-time employees on the payroll at the end of FY 2024, excluding contract workers and other workers not carried on the payroll of the U.S. affiliate. A count taken during, rather than at the end of, FY 2024 may be used provided it is a reasonable estimate for the end of FY 2024 number. If employment at the end of FY 2024, or the count taken at some other time during FY 2024, was unusually high or low because of temporary factors (e.g., a strike), give the number of employees that reflects normal operations. If the business enterprise's activity involves large seasonal variations, give the average number of employees for FY 2024. If given, the average should be the average for FY 2024 of the number of persons on the payroll at the end of each payroll period, month, or quarter. If precise figures are not available, give your best estimate.

Total employee compensation – Base compensation on payroll records. Employee compensation must cover compensation charged as an expense on the income statement, charged to inventories, or capitalized during the reporting period. Exclude employee compensation related to activities of a prior period, such as compensation capitalized or charged to inventories in prior periods. Employee compensation consists of:

**Wages and salaries** – are the gross earnings of all employees before deduction of employees' payroll withholding taxes, social insurance contributions, group insurance premiums, union dues, etc. Include time and piece rate payments, cost of living adjustments, overtime pay and shift differentials, bonuses, profit sharing amounts, and commissions. Exclude commissions paid to persons who are not employees.

**Employee benefit plans** – are employer expenditures for all employee benefit plans, including those required by government statute, those resulting from a collective-bargaining contract, or those that are voluntary. Employee benefit plans include Social Security and other retirement plans, life and disability insurance, guaranteed sick pay programs, workers' compensation insurance, medical insurance, family allowances, unemployment insurance, severance pay funds, etc. If plans are financed jointly by the employer and the employee, include only the contributions of the employer.

the U.S. affiliate – Research and development (R&D) comprise creative and systematic work undertaken in order to increase the stock of knowledge and to devise new applications of available knowledge. This includes a) activities aimed at acquiring new knowledge or understanding without specific immediate commercial applications or uses (basic research); b) activities aimed at solving a specific problem or meeting a specific commercial objective (applied research); and c) systematic work, drawing on research and practical experience and resulting in additional knowledge, which is directed to producing new products or processes or to improving existing products or processes (development). R&D includes both direct costs such as salaries of researchers as well as administrative and overhead costs clearly associated with the company's R&D.

The term R&D does **NOT** include expenditures for:

- Costs for routine product testing, quality control, and technical services unless they are an integral part of an R&D project
- · Market research
- Efficiency surveys or management studies
- Literary, artistic, or historical projects, such as films, music, or books and other publications
- Prospecting or exploration for natural resources

## IV. INSTRUCTIONS FOR SPECIFIC SECTIONS OF THE REPORT FORM-Continued

Basic research is the pursuit of new scientific knowledge or understanding that does not have specific immediate commercial objectives, although it may be in fields of present or potential commercial interest.

Applied research applies the findings of basic research or other existing knowledge toward discovering new scientific knowledge that has specific commercial objectives with respect to new products, services, processes, or methods.

Development is the systematic use of the knowledge or understanding gained from research or practical experience directed toward the production or significant improvement of useful products, services, processes, or methods, including the design and development of prototypes, materials, devices, and systems.

R&D includes the activities described above whether assigned to separate R&D organizational units of the company or carried out by company laboratories and technical groups not a part of an R&D organization.

INCLUDE all costs incurred to support R&D performed by the affiliate. INCLUDE wages, salaries, and related costs; materials and supplies consumed; depreciation on R&D property and equipment; cost of computer software used in R&D activities; utilities, such as telephone, electricity, water, and gas; travel costs and professional dues; property taxes and other taxes (except income taxes) incurred on account of the R&D organization or the facilities they use; insurance expenses; maintenance and repair, including maintenance of buildings and grounds; company overhead including: personnel, accounting, procurement and inventory, and salaries of research executives not on the payroll of the R&D organization. EXCLUDE capital expenditures, expenditures for tests and evaluations once a prototype becomes a production model, patent expenses, and income taxes and interest.

## Does R&D include development of software and Internet applications?

Research and development activity in software and Internet applications refers only to activities with an element of uncertainty and that are intended to close knowledge gaps and meet scientific and technological needs.

R&D activity in software INCLUDES:

- Software development or improvement activities that expand scientific or technological knowledge
- Construction of new theories and algorithms in the field of computer science

R&D activity in software **EXCLUDES**:

- Software development that does not depend on a scientific or technological advance, such as
  - · supporting or adapting existing systems
  - adding functionality to existing application programs, and
  - routine debugging of existing systems and software
- Creation of new software based on known methods and applications
- Conversion or translation of existing software and software languages
- Adaptation of a product to a specific client, unless knowledge that significantly improved the base program was added in that process

### **V. SPECIAL INSTRUCTIONS**

A. Insurance companies – Reporting should be in accordance with U.S. Generally Accepted Accounting Principles, not Statutory Accounting Practices (SAP). For example, the BE-15 report should include the following assets even though they are not acceptable under SAP: 1. non-trusteed or free account assets, and 2. nonadmitted assets such as furniture and equipment, agents' debit balances, and all receivables deemed to be collectible.

B. Real Estate – The ownership of real estate is defined to be a business enterprise, and if the real estate is foreign owned, it is a U.S. affiliate of a foreign person. A BE-15 report is required unless the enterprise is otherwise exempt.

Residential real estate held exclusively for personal use and not for profit making purposes is not subject to the reporting requirements. A residence that is an owner's primary residence that is then leased by the owner while outside the United States, but which the owner intends to reoccupy, is considered real estate held for personal use and therefore not subject to the reporting requirements. Ownership of U.S. residential real estate by a corporation whose sole purpose is to hold the real estate for the personal use of the owner(s) of the corporation is considered to be real estate held for personal use and therefore not subject to the reporting requirements.

**Aggregation of real estate investments** – A foreign person holding real estate investments that are reportable on the BE-15 must aggregate all such holdings for the purpose of applying the reporting criteria. If the aggregate of such holdings exceeds one or more of the exemption levels, then the holdings must be reported even if individually they would be exempt. In such a case, file a single Form BE-15C to report the aggregated holdings. If permission has been received in writing from BEA to file on an non-aggregated basis, the reports should be filed as a group and you should inform BEA that they are all for one owner.

On page 1, name and address of U.S. business enterprise, BEA is not seeking a legal description of the property, nor necessarily the address of the property itself. Because there may be no operating business enterprise for a real estate investment, what BEA seeks is a consistently identifiable name for the investment (i.e., the U.S. affiliate) together with an address to which report forms can be mailed so that the investment (affiliate) can be reported on a consistent basis for each reporting period and for the various BEA surveys.

Thus, on page 1 of the BE-15 survey forms the "name and address" of the U.S. affiliate might be:

XYZ Corp. N.V., Real Estate Investments c/o B&K Inc., Accountants 120 Major Street Miami, FL XXXXX

If the investment property has a name, such as Sunrise Apartments, the name and address on page 1 of the BE-15 survey forms might be:

Sunrise Apartments c/o ABC Real Estate 120 Major Street Miami, FL XXXXX

There are items throughout the Form BE-15C that may not be applicable to certain types of real estate investments, such as the employer identification number and the number of employees. In such cases, enter zero or leave items blank as appropriate.

- **C. Joint ventures and partnerships** If a foreign person has a direct or indirect voting ownership interest of 10 percent or more in a joint venture, partnership, etc., that is formed to own and hold, develop, or operate real estate, the joint venture, partnership, etc., in its entirety, not just the foreign person's share, is a U.S. affiliate and must be reported as follows:
  - If the foreign interest in the U.S. affiliate is directly held by the foreign person, then a BE-15 report must be filed by the affiliate (subject to the aggregation rules discussed above).
  - If a voting interest of more than 50 percent in the U.S. affiliate is owned by another U.S. affiliate, the owned affiliate must be fully consolidated in the BE-15 report of the owning affiliate.
  - 3. If a voting interest of 50 percent or less in the U.S. affiliate is owned by another U.S. affiliate, and no U.S. affiliate owns a voting interest of more than 50 percent, then a separate BE-15 report must be filed by the owned affiliate. The BE-15 report(s) of the owning affiliate(s) must show an equity investment in the owned affiliate.
- D. Farms For farms that are not operated by their foreign owners, the income statement and related items should be prepared based on the extent to which the income from the farm accrues to, and the expenses of the farm are borne by, the owner. Generally, this

#### V. SPECIAL INSTRUCTIONS - Continued

means that income, expenses, and gain (loss) assignable to the owner should reflect the extent to which the risk of the operation falls on the owner. For example, even though the operator and other workers on the farm are hired by a management firm, if their wages and salaries are assigned to, and borne by, the farm operation being reported, then the operator and other workers should be reported as employees of that farm operation and the wages and salaries should be treated as an expense.

### E. Estates, trusts, and intermediaries

**A Foreign Estate** is a person and therefore may have direct investment, and the estate, not the beneficiary, is considered to be the owner.

A Trust is a person but it is not a business enterprise. The trust is considered to be the same as an intermediary, and reporting should be as outlined below. For reporting purposes, the beneficiary(ies) of the trust is (are) considered to be the owner(s) for purposes of determining the existence of direct investment, except in two cases: (1) if there is, or may be, a reversionary interest, or (2) if a corporation or other organization creates a trust, designating its shareholders or members as beneficiaries. In these two cases, the creator(s) of the trust is (are) deemed to be the owner(s) of the investments of the trust (or succeeding trusts where the presently existing trust had evolved out of a prior trust), for the purposes of determining the existence and reporting of direct investment (These instructions are not applicable to REITs.)

This procedure is adopted in order to fulfill the statistical purposes of this survey and does not imply that control over an enterprise owned or controlled by a trust is, or can be, exercised by the beneficiary(ies) or creator(s).

#### For An Intermediary:

1. If a U.S. intermediary holds, exercises, administers, or manages a particular foreign direct investment in the United States for the beneficial owner, such intermediary is responsible for reporting the required information for, and in the name of, the U.S. affiliate. Alternatively, the U.S. intermediary can instruct the U.S. affiliate to submit the required information. Upon so doing, the intermediary is released from further liability to report, provided it has informed BEA of the date such instructions were given and provides BEA the name and address of the U.S. affiliate, and has supplied the U.S. affiliate with any information in the possession of, or which can be secured by, the intermediary that is necessary to permit the U.S. affiliate to complete the required reports.

When acting in the capacity of an intermediary, the accounts or transactions of the U.S. intermediary with a UBO are considered as accounts or transactions of the U.S. affiliate with the UBO. To the extent such transactions or accounts are unavailable to the U.S. affiliate, BEA may require the intermediary to report them.

2. If a UBO holds a U.S. affiliate through a foreign intermediary, the U.S. affiliate may report the intermediary as its foreign parent but, when requested, must also identify and furnish information concerning the UBO. Accounts or transactions of the U.S. affiliate with the foreign intermediary are considered as accounts or transactions of the U.S. affiliate with the UBO.

### VI. FILING THE BE-15

- A. Due date A completed report, or Claim for Exemption from filing, covering a reporting company's fiscal year ending in calendar year 2024 is due no later than May 31, 2025 (or by June 30 for reporting companies that use BEA's eFile system). Go to <a href="https://www.bea.gov/efile">www.bea.gov/efile</a> for details about using eFile.
- B. Extensions For the efficient processing of the survey and timely dissemination of the results, it is important that your report is filed by the due date. Nevertheless, reasonable requests for extension of the filing deadline will be granted.

Requests for extensions may be submitted through the eFile system at <a href="https://www.bea.gov/efile">www.bea.gov/efile</a>. All requests for extensions must be received **NO LATER THAN** May 31, 2025.

- C. Assistance For assistance, telephone (301) 278-9247 or send e-mail to <u>be12/15@bea.gov</u>. Forms can be obtained from BEA's Web site at: www.bea.gov/fdi
- D. Electronic Filing Forms that can be transmitted to BEA electronically will be available on the BEA website: <a href="www.bea.gov/efile">www.bea.gov/efile</a>. If you eFile, please do not submit paper reports.
- E. Annual stockholders' report or other financial statements Furnish a copy of your FY 2024 annual stockholders' report or Form 10-K when filing the BE-15 report. If you do not publish an annual stockholders' report or file Form 10-K, provide any financial statements that may be prepared, including the accompanying notes. Information contained in these statements is useful in reviewing your report and may reduce the need for further contact. Section 5(c) of the International Investment and Trade in Services Survey Act, Public Law 94-472, 90 Stat. 2059, 22 U.S.C. 3101-3108, as amended, provides that this information can be used for analytical and statistical purposes only and that it must be held strictly confidential.
- F. Retention of copies Each U.S. affiliate must retain a copy of its report to facilitate the resolution of problems. These copies should be retained by the U.S. affiliate for at least 3 years after the report's original due date.