

Country-by-Country Report, Tax Year 2021



The Country-by-Country Report is used by U.S. multinational enterprise (MNE) groups to report certain information on a country-by-country basis. MNE groups report this information on Form 8975 and Schedule A (Form 8975). The IRS Statistics of Income Division (SOI) produced sample-based annual aggregate statistics from Form 8975 and Schedule A (Form 8975) tax filings for ultimate parent entities that filed Forms 1120 or 1065 with accounting periods ending between July 2021 and June 2022.

Tax Jurisdiction Information by Major Geographic Region, Tax Years 2020 and 2021

[Money amounts in thousands of dollars]

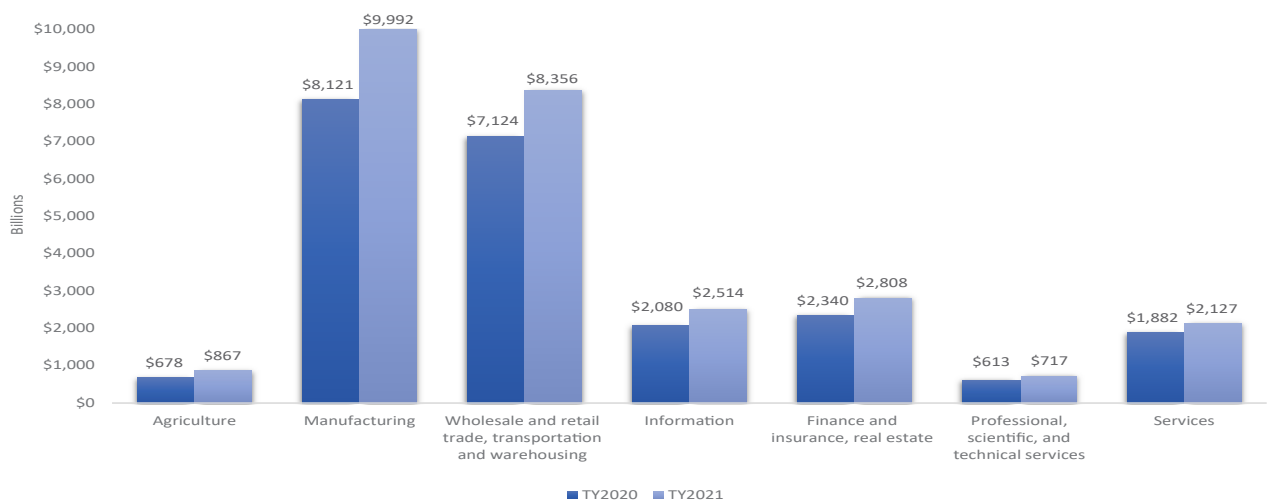
Major Geographic Region	Number of reporting MNE groups		Number of constituents		Total revenues		Profit before income tax		Accumulated earnings	
	TY2020	TY2021	TY2020	TY2021	TY2020	TY2021	TY2020	TY2021	TY2020	TY2021
Total	1,759	1,791	206,457	209,042	\$22,838,184,566	\$27,381,662,623	\$1,669,526,983	\$2,902,147,568	\$13,340,940,420	\$14,181,881,798
United States Operations	1,691	1,721	77,084	80,155	\$14,770,261,112	\$17,703,598,990	\$874,700,943	\$1,853,836,441	\$9,666,094,008	\$10,676,095,345
European Operations	1,459	1,483	55,622	56,058	\$3,759,252,296	\$4,367,549,463	\$255,062,962	\$302,193,963	\$1,808,838,372	\$1,688,018,493
Americas Operations	1,602	1,628	23,682	23,915	\$1,255,371,308	\$1,455,480,415	\$172,191,896	\$144,305,252	\$543,343,361	\$365,926,321
Asia & Oceania Operations	1,432	1,467	30,769	31,524	\$2,201,792,294	\$2,693,057,805	\$191,360,394	\$261,111,918	\$641,833,452	\$713,691,446
Africa Operations	626	623	3,689	3,659	\$69,273,218	\$80,067,571	\$5,544,452	\$12,251,139	\$14,846,278	\$13,245,740

NOTE: Details may not add to totals due to rounding, filing by multinational enterprise groups of information for more than one tax jurisdiction, and excluding stateless and other country tax jurisdiction data.
 SOURCE: IRS, Statistics of Income Division, Country-by-Country Reports Study, Tax Years 2020 and 2021, April 2024.

Highlights of the Data, Tax Year 2021

- In Tax Year 2021, U.S. MNE groups filed 1,791 Country-by-Country reports.
- There were 209,042 constituent entities reported for Tax Year 2021.
- For Tax Year 2021, there were 136 economies (tax jurisdictions) included.
- U.S. MNE groups reported \$27.4 trillion in total revenue; \$17.7 trillion of total revenue captured in the U.S., and \$8.6 trillion captured in foreign jurisdictions (Europe, Americas, Asia and Oceania, and Africa).
- The total profit before income tax was \$2.9 trillion; 64% (\$1.9 trillion) of it was attributed to U.S. operations, while \$720 billion was earned in foreign jurisdictions.
- U.S. MNE groups reported \$2.8 trillion in total foreign accumulated earnings in the Tax Year 2021.
- About 82% (\$2.3 trillion) of the U.S. MNE's total foreign accumulated earnings was earned in 12 countries: United Kingdom, Netherlands, Singapore, Bermuda, Canada, Ireland, China, Japan, Hong Kong, Luxembourg, Switzerland, Cayman Islands.
- As in previous years, manufacturing was the primary industry of U.S. MNE groups, accounting for 36% of total revenue. The wholesale and retail trade and the transportation and warehousing industries were the second largest industry group of U.S. MNEs, accounting for a combined 31% of total revenue.

Total Revenues of Multinational Enterprise Groups Designated by Major Industry Group, Tax Years 2020 and 2021



SOURCE: IRS, Statistics of Income Division, Country-by-Country Reports Study, Tax Years 2020 and 2021, April 2024.

