

# Country-by-Country Report, Tax Year 2020



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 Form 8975, Schedule A. The IRS Statistics of Income Division (SOI) produced sample-based annual aggregate statistics from Form 8975 tax filings for ultimate parent entities that filed Forms 1120 or 1065 with accounting periods ending between July 2020 and June 2021.

## Tax Jurisdiction Information by Major Geographic Region, Tax Years 2019 and 2020

[Money amounts in thousands of dollars]

	Number of reporting MNE groups		Number of constituents		Total revenues		Profit before income tax		Accumulated earnings	
	TY2019	TY2020	TY2019	TY2020	TY2019	TY2020	TY2019	TY2020	TY2019	TY2020
<b>Total</b>	1,698	1,759	203,275	206,457	\$23,481,458,518	\$22,838,184,566	\$2,229,047,301	\$1,669,526,983	\$13,644,307,706	\$13,340,940,420
<b>United States Operations</b>	1,627	1,691	73,975	77,084	\$15,176,358,871	\$14,770,261,112	\$1,295,596,596	\$874,700,943	\$9,565,197,540	\$9,666,094,008
<b>European Operations</b>	1,415	1,459	56,003	55,622	\$3,816,569,404	\$3,759,252,296	\$354,094,135	\$255,062,962	\$2,299,602,735	\$1,808,838,372
<b>Americas Operations</b>	1,553	1,602	23,620	23,682	\$1,400,425,597	\$1,255,371,308	\$209,094,463	\$172,191,896	\$441,504,593	\$543,343,361
<b>Asia &amp; Oceania Operations</b>	1,388	1,432	31,002	30,769	\$2,188,125,196	\$2,201,792,294	\$193,739,313	\$191,360,394	\$612,927,189	\$641,833,452
<b>Africa Operations</b>	618	626	3,684	3,689	\$81,476,290	\$69,273,218	\$11,553,267	\$5,544,452	\$30,696,741	\$14,846,278

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 2019 and 2020, April 2023.

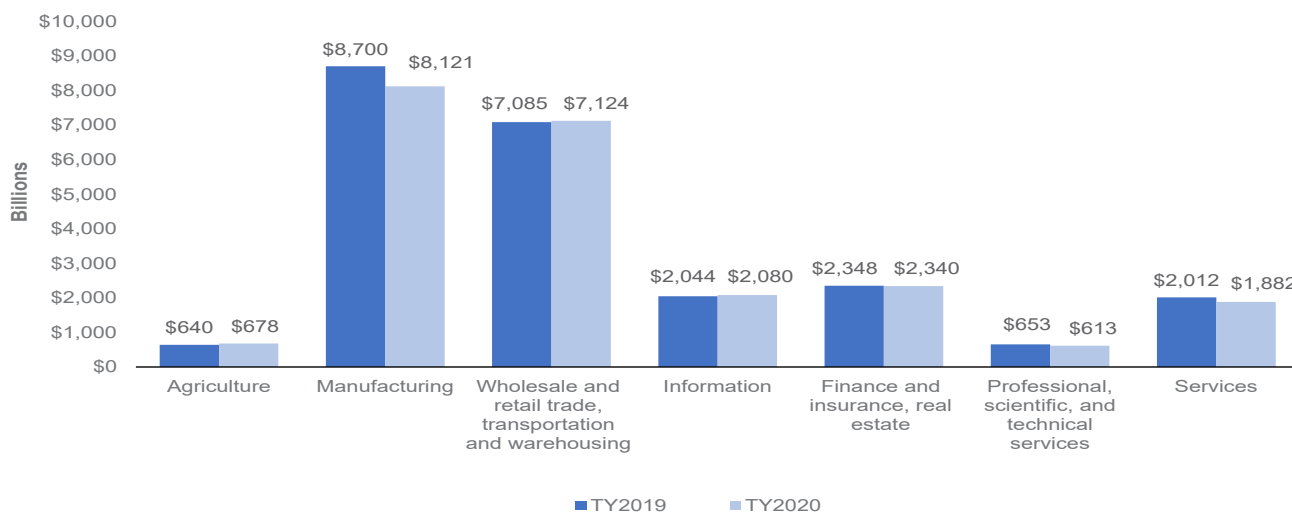
## Highlights of the Data, Tax Year 2020

- The Tax Year 2020 Form 8975 study contained 1,759 Country-by-Country reports.
- There were 206,457 constituent entities reported for 2020.
- For 2020, there were 140 economies (tax jurisdictions) included.
- U.S. MNE groups reported \$22.8 trillion in total revenue; \$14.8 trillion of total revenue captured in the U.S. and \$7.3 trillion captured in foreign jurisdictions (Europe, Americas, Asia and Oceania, and Africa).
- Total of \$1.7 trillion was reported for the profit before income tax; 52% (\$875 billion) of the total profit

before income tax was attributed to U.S. operations, while \$624 billion was earned in foreign jurisdictions.

- Approximately 84% (\$522 billion) of the U.S. MNE's total foreign profits before income tax was earned in 13 countries: Singapore, Ireland, Bermuda, United Kingdom, Puerto Rico, China, Cayman Islands, Japan, Canada, Netherlands, Hong Kong, Mexico, and India.
- MNE groups reported \$3 trillion in total foreign accumulated earnings in 2020.
- Based on total revenue, manufacturing was the primary industry of U.S. MNE groups (36% of total revenue). MNEs in the wholesale and retail trade, and the transportation and warehousing industries accounted for a combined 31% of total revenue.

## Total Revenues of Multinational Enterprise Groups Designated by Major Industry Group, Tax Years 2019 and 2020



SOURCE: IRS, Statistics of Income Division, Country-by-Country Reports Study, Tax Years 2019 and 2020, April 2023.