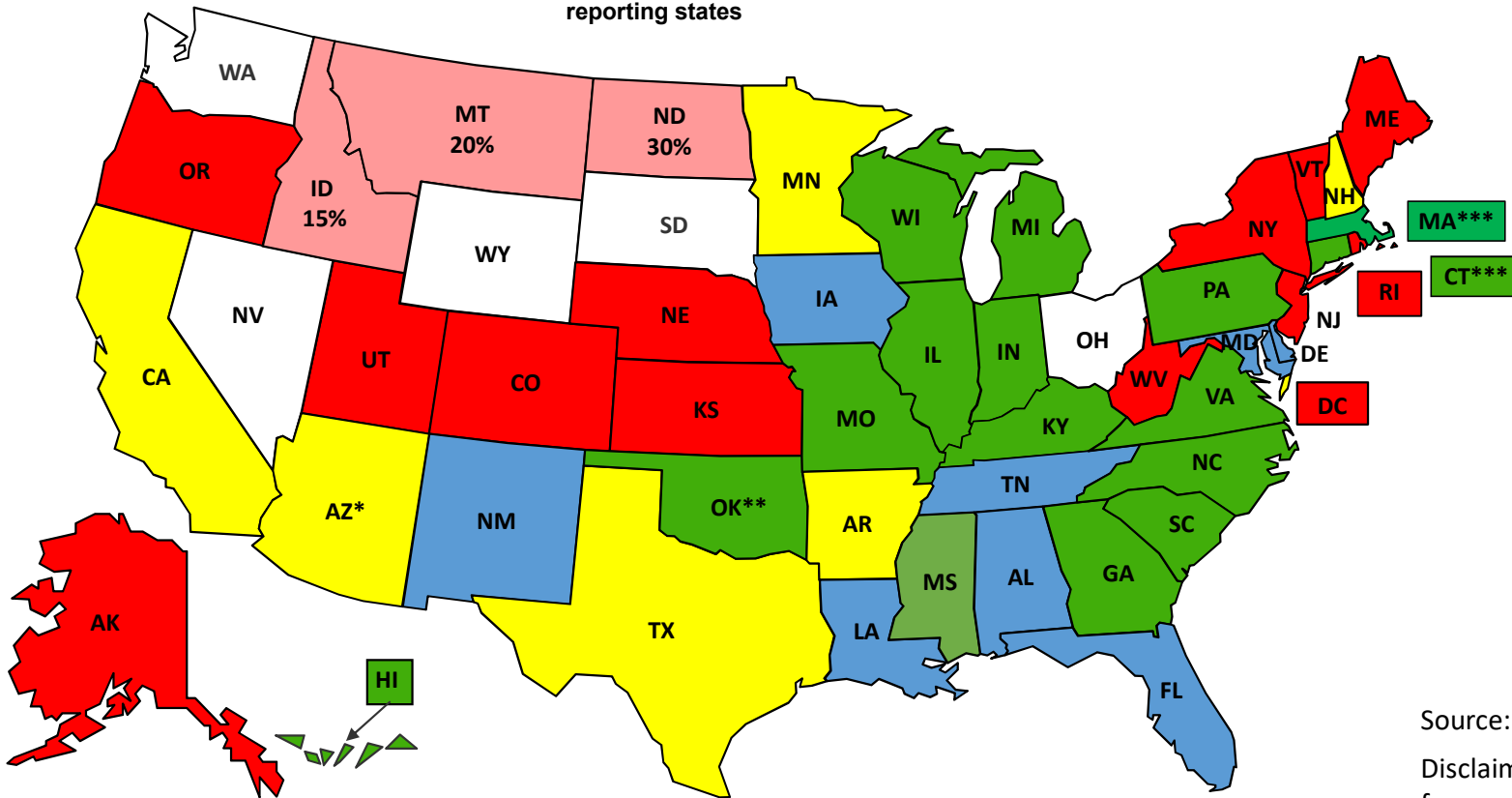


Current Status of State Conformity to GILTI

- Decoupled from GILTI (or excludes 95%)
- Potentially coupled to GILTI, but inclusion is likely constitutionally prohibited in separate reporting states
- Have not addressed IRC conformity and/or GILTI coupling specifically
- Coupled or potentially coupled to 10% to 30% of GILTI
- Coupled or potentially coupled to GILTI*



* Generally, GILTI is not specifically referenced in state conformity statutes so there remains the possibility that some of these states will decouple from some or all of GILTI by administrative guidance or future clarifying legislation.

This chart also does not reflect that many of these states adopt the Section 250 deduction and reduce GILTI by 50%

**Decoupled from GILTI for non-domiciliaries

***5% of GILTI taxed

Source: Council On State Taxation

Disclaimer: this information should be used for general guidance and not relied upon for compliance