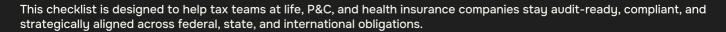
Tax Compliance Checklist for Insurance Companies (2025 Edition) ヿ



1. Federal Compliance (Subchapter L & CAMT)

Forms & Filing

- File correct return type (Form 1120-L, 1120-PC)
- · Complete Schedule M-3 if applicable
- · Report and track DAC under §848
- · Apply updated §807 or §816 reserve deductions
- Ensure proration rules (§805) are applied correctly
- · Include required disclosures for stock buybacks (if applicable)

Estimated Payments

- · Q1-Q4 estimated payments aligned with actual tax position
- · Reconcile reserve and DAC estimates mid-year

CAMT (Corporate Alternative Minimum Tax)

- Model AFSI with appropriate reserve and separate account adjustments
- Disclose CAMT impact in provision and return (Form 4626 or equivalent)
- Track CAMT deferred taxes separately

3. International Compliance

BEAT & QDP

- Model BEAT exposure on reinsurance payments to offshore affiliates
- Make and disclose QDP election where applicable (Form 8991)
- Retain intercompany agreements and pricing documentation

QDMTT & Pillar Two

- Include QDMTT in Bermuda or low-tax hubs in ETR modeling
- · Prepare GloBE-compliant data sets and reconciliations

Forms

• File Form 5471, 5472, 8990-8991 as applicable

5. Audit Readiness & Risk Management

Audit-Ready Files

- DAC memos, reserve calculations, intercompany reinsurance docs
- · Reconcile Schedule P with tax-deductible loss reserves
- Store signed treaties, transfer pricing support, and NAIC schedules

BOI Compliance (FinCEN)

- Reconcile beneficial ownership filings with Form 5471/5472/8991
- Monitor captives and affiliate disclosures for consistency

Mock Exams & Controls

- Conduct annual mock audit with internal or external reviewers
- Perform quarterly reconciliation of deferred tax balances
- Maintain audit log of key assumptions, changes, and returns

2. State and Local Tax Compliance

Premium Tax Filings

- Maintain up-to-date premium tax matrix by state
- · Include correct assessments, surcharges, and credits
- · Track filing thresholds and due dates across all states

Retaliatory Tax

- · Calculate retaliatory tax using current home/host rates
- Document assumptions and include NAIC Schedule of Fees
- · Upload required home-state fee disclosures with returns

City and Municipal Tax Filings

- File GRT or lease tax in applicable cities (e.g., SF, Philly, Portland)
- Monitor remote staff triggers and sales attribution

Amended Returns & Refunds

- · Track statute of limitations (by state)
- · Maintain documentation for adjustments and revised filings

Premium Tax Credits & ESG Incentives

- Identify eligible credits (green bonds, rural investment, hiring programs)
- · Register for credits in advance, where required
- · Retain substantiating documentation

4. Accounting Alignment (GAAP, SAP, Tax)

Reserve and DAC Reconciliation

- Reconcile SAP reserves with \$807/\$816 deductions
- Align DAC capitalization with GAAP/SAP treatment
- Disclose deferred tax positions in GAAP financials

IFRS 17 / LDTI Integration

- Monitor timing differences between new accounting standards and tax
- Align local IFRS financials with U.S. consolidated tax provision
- Prepare MD&A disclosures addressing book-tax divergence

6. Team, Tech, and Process

Assigned Roles

- Tax: Returns, provision, BEAT/CAMT/QDMTT modeling
- · Actuarial: Reserves, DAC input
- IT: Data feeds, e-filing support
- Compliance/Legal: BOI filings, documentation review

Technology Integration

- Automate compliance workflows with tools like TaxGPT
- Use a centralized tracker for filings, payments, credits, and deadlines.
- Enable real-time alerts for filing obligations and regulatory updates