【表紙】

【提出書類】	外国会社臨時報告書
【提出先】	関東財務局長
【提出日】	平成30年3月7日
【会社名】	ザ　コカ・コーラ　カンパニー (The Coca-Cola Company)
【代表者の役職氏名】	上級副社長、ゼネラル・カウンセル兼チーフ・リーガル・カウンセル (Senior Vice President, General Counsel and Chief Legal Counsel) バーンハード・グーペルト (Bernhard Goepelt)
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【代理人の氏名又は名称】	弁護士　　門田　正行
【代理人の住所又は所在地】	東京都千代田区丸の内二丁目7番2号 ＪＰタワー 長島・大野・常松法律事務所
【電話番号】	03-6889-7000
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【電話番号】	03-6889-7000
【縦覧に供する場所】	該当なし

（注）
本報告書において便宜上記載されている日本円への換算は、１米ドル＝106.73円の換算レート（株式会社三菱東京UFJ銀行が発表した2018年3月1日現在の対顧客電信直物相場から算出した仲値）を用いて行われている。

(Note)
In this Report, for the convenience of the Japanese readers, conversion into Japanese yen has been made at the exchange rate of $1.00=JPY106.73 (the middle rate calculated from the Telegraphic Transfer Spot Exchange Rate for Customers as of March 1, 2018, quoted by The Bank of Tokyo-Mitsubishi UFJ, Ltd.).

1【提出理由】

ザ　コカ・コーラ カンパニー（以下、「当社」という。）は、当社及び当社グループの財政状態、経営成績及びキャッシュ・フローの状況に著しい影響を与える事象が発生したので、金融商品取引法第24条の5第4項並びに企業内容等の開示に関する内閣府令第19条第1項及び同条第2項第12号及び第19号の規定に基づき本報告書を提出するものである。

2【報告内容】

(1) Date of occurrence of the event:

December 22, 2017

(2) Nature of the event:

The Tax Cuts and Jobs Act ("Tax Reform Act") was signed into law on December 22, 2017. Among other things, the Tax Reform Act reduces the U.S. federal corporate tax rate from 35.0 percent to 21.0 percent effective for tax years beginning after December 31, 2017, transitions the U.S. method of taxation from a worldwide tax system to a modified territorial system and requires companies to pay a one-time transition tax over a period of eight years on the mandatory deemed repatriation of prescribed foreign earnings as of December 31, 2017. At December 31, 2017, the Company has not yet finalized the calculations of the tax effects of the Tax Reform Act; however, the Company has calculated a reasonable estimate of the effects on its year end income tax provision in accordance with its current understanding of the Tax Reform Act and the available guidance. As a result, the Company recognized a net provisional tax charge in the amount of $3.6 billion (JPY384 billion) in 2017, which is included as a component of income taxes from continuing operations on the Company’s consolidated statement of income. The Company will continue to refine its calculations as additional analysis is completed. In addition, the Company’s estimates may also be affected as it gains a more thorough understanding of the Tax Reform Act as a result of potential legislative or regulatory provisions or interpretive guidance.

The one-time transition tax is based on the Company’s total accumulated post-1986 prescribed foreign earnings and profits ("E&P") estimated to be $42 billion (JPY4,483 billion), the majority of which was previously considered to be indefinitely reinvested and, accordingly, no U.S. federal and state income taxes had been provided. The Company recorded a provisional tax amount of $4.6 billion (JPY491 billion) as a reasonable estimate for the Company’s one-time transition tax liability and a $0.6 billion (JPY64 billion) provisional deferred tax for the related withholding taxes and state income taxes. Because of the complexities of the Tax Reform Act, the Company is still finalizing its calculation of the total accumulated post-1986 prescribed E&P for the applicable foreign entities. Further, the transition tax is based in part on the amount of those earnings held in cash and other specified assets. This amount may change when the Company finalizes the calculation of post-1986 prescribed foreign E&P and finalizes the amounts held in cash or other specified assets. No additional income taxes have been provided for any additional outside basis differences inherent in these entities, as these amounts continue to be provisionally indefinitely reinvested in foreign operations. Determining the amount of unrecognized deferred tax liability related to any additional outside basis differences in these entities (i.e., basis differences in excess of that subject to the one-time transition tax) is not practicable. The Company also remeasured and adjusted certain deferred tax assets and liabilities based on the rates at which they are expected to reverse in the future, which is generally 21.0 percent. However, the Company is still analyzing certain aspects of the Tax Reform Act and refining its calculations, which could affect the measurement of these balances or give rise to new deferred tax amounts. The provisional amount recorded related to the remeasurement and adjustments of the Company’s deferred tax balance was a tax benefit of $1.6 billion (JPY171 billion).

On December 22, 2017, Staff Accounting Bulletin No. 118 ("SAB 118") was issued to address the application of U.S. GAAP in situations when a registrant does not have the necessary information available, prepared, or analyzed (including computations) in reasonable detail to finalize the calculations for certain income tax effects of the Tax Reform Act. In accordance with SAB 118, the Company has determined that the net tax charge of $3.6 billion (JPY384 billion) recorded in connection with the Tax Reform Act is a provisional amount and a reasonable estimate as of December 31, 2017. Additional work is necessary to finalize the calculations for certain income tax effects of the Tax Reform Act. Additionally, certain of the Company’s equity method investees are impacted by the Tax Reform Act and have recorded provisional tax amounts. To the extent their provisional amounts are refined in 2018, the Company will record the Company’s proportionate share in the line item equity income (loss) — net in the Company’s consolidated statement of income.

The Global Intangible Low-Taxed Income ("GILTI") provisions of the Tax Reform Act require the Company to include in its U.S. income tax return foreign subsidiary earnings in excess of an allowable return on the foreign subsidiary's tangible assets. The Company has not yet elected an accounting policy related to how it will account for GILTI and therefore has not provided any deferred tax impacts of GILTI in its consolidated financial statements for the year ended December 31, 2017.

The Company's effective tax rate is expected to be approximately 21.0 percent in 2018. This estimated tax rate does not reflect the potential impact of further clarification of certain matters related to the Tax Reform Act and any unusual or special items that may affect the Company’s tax rate in 2018.

(3) Effect of the event on the consolidated profit/loss of the Company:

As described in (2) above, the Company recognized a net provisional tax charge in the amount of $3.6 billion (JPY384 billion) in 2017, which is included as a component of income taxes from continuing operations on the Company’s consolidated statement of income.