

In this issue



3
Updated online tax calculators and rates for 2018



4
Capital allocation and Canadian competitiveness survey: how government policy shifts are affecting Canadian business



9
Tax officials examine procurement



11
No relief possible for missed tax credit application deadlines



13
Publications and articles

TaxMatters@EY is a monthly Canadian bulletin that summarizes recent tax news, case developments, publications and more. For more information, please contact your EY advisor.

Canada – TaxMatters@EY

July 2018

Additional trust reporting requirements coming soon

Alan Roth, Toronto

The 2018 federal budget announced increased information reporting requirements for trusts, beginning with the 2021 taxation year, to help the Canada Revenue Agency (CRA) in its efforts to counter tax avoidance. Trustees and others who may be affected should familiarize themselves with the new requirements to reduce the risk of penalties.

Background

The *Income Tax Act (Canada)* requires a trust to file an annual return, the T3 Trust Income Tax and Information Return (T3 return), within 90 days of the end of its taxation year. However, there are a number of statutory¹ and administrative exceptions to this filing requirement.

Generally, a trust only has to file a T3 return for a taxation year if:

- ▶ It earns taxable income and it has income tax payable, or
- ▶ It has disposed of capital property, or
- ▶ It has realized a taxable capital gain or
- ▶ It makes a distribution of all or part of its income, gains or capital to one or more of its beneficiaries.²

¹ For example, subsections 150(1.1) and (5) of the *Income Tax Act (Canada)*.

² More specifically, if the trust has total income from all sources of more than \$500, or income of more than \$100 allocated to any single beneficiary.



A trust that is nonresident throughout the year also has to file a T3 return if it has disposed of taxable Canadian property.³ For a list of circumstances in which a trust is required to file a T3 return, please see page 15 of the CRA's [T4013, T3 Trust Guide 2017](#).

When a trust is required to file a T3 return, there is currently no requirement for it to report the identity of all of its beneficiaries. As a result of the current exceptions and limitations to the annual trust reporting requirement, the government has expressed concern that there may be significant gaps with respect to the collection and reporting of information about trusts, which could impair the CRA's ability to assess the tax liability of trusts and their beneficiaries.

The 2018 federal budget papers stated that sufficient information is required to effectively counter aggressive tax avoidance, tax evasion, money laundering and other criminal activities, given that some taxpayers may have used trusts in complex arrangements to prevent the authorities from acquiring this required information. Therefore, the 2018 federal budget announced that the government will enhance the tax reporting requirements for most trusts.

Additional reporting requirements

Effective for tax returns filed for the 2021 and later taxation years, additional information reporting will be required on an annual basis for express trusts (i.e., trusts that are created with the settlor's express written intent, as opposed to other trusts arising by operation of law)⁴ that are resident in Canada and for nonresident trusts that are currently required to file a T3 return.

These proposals will create an annual T3 return filing requirement for certain trusts that are currently not required to file a T3 return.

Trusts subject to the proposed reporting requirements will have to report the identity of all trustees, beneficiaries and settlors of the trust, as well as the identity of each person who has the ability, as a result of the trust terms or a related agreement, to exert control over trustee decisions regarding the allocation of trust income or capital (e.g., a protector). A new beneficial ownership schedule will be added to the T3 return to report this information.

The CRA will provide further information about this new schedule on its website when it becomes available.

Certain types of trusts will be excluded from these proposed additional reporting requirements, including:

- ▶ Mutual fund trusts, segregated funds and master trusts
- ▶ Trusts governed by registered plans⁵
- ▶ Lawyers' general trust accounts
- ▶ Graduated rate estates and qualified disability trusts
- ▶ Trusts that qualify as nonprofit organizations or registered charities
- ▶ Trusts that have been in existence for less than three months or that hold less than \$50,000 in assets throughout the taxation year (with the assets confined to deposits, government debt obligations and listed securities)

New penalties will apply for failure to file a T3 return (including the new beneficial ownership schedule in circumstances where the schedule is applicable) that is required to be filed, effective for the 2021 and later taxation years. The penalty will be \$25 per day, with a minimum penalty of \$100 and a maximum penalty of \$2,500. If the failure to file the return was made knowingly or due to gross negligence, an additional penalty will apply equal to 5% of the maximum fair market value of the property held by the trust during the taxation year, with a minimum penalty of \$2,500. In addition, existing penalties applicable to the T3 return will continue to apply (i.e., late-filing return penalty, repeated failure to report income penalty). The government also announced that it will be funding the development of an electronic platform for the processing of T3 returns, in order to implement these new reporting requirements and improve the audit and administration of trusts.

Conclusion

The proposed trust reporting requirements will constitute an additional compliance burden on many trusts. Trusts that are currently not required to file a T3 return, but would be under the proposed rules, will soon need to budget for the costs involved in the preparation and filing of this return. Some trustees will likely be unaware of the proposed rules, or will be unwilling to share some of the new information required under the proposed rules (e.g., regarding nonresident trusts), but will nevertheless be compelled to do so.

³ As defined under the Income Tax Act (Canada), and subject to certain exceptions. Taxable Canadian property consists of various types of properties and investments, including real property situated in Canada, property used in carrying on a business in Canada, certain shares of corporations, and certain interests in partnerships or trusts.

⁴ For example, resulting or constructive trusts or certain trusts deemed to arise under the provisions of a statute.

⁵ Includes deferred profit sharing plans, pooled registered pension plans, registered disability savings plans, registered education savings plans, registered pension plans, registered retirement income funds, registered retirement savings plans, registered supplementary unemployment benefit plans and tax-free savings accounts.

Updated online tax calculators and rates for 2018

Lucie Champagne, Alan Roth, Candra Anttila and Andrew Rosner, Toronto



We've updated our popular personal tax calculator and rate cards to reflect budget proposals and news releases up to 15 June 2018.

Frequently referred to by financial planning columnists, our mobile-friendly 2018 personal tax calculator is found at ey.com/ca/taxcalculator.

This tool lets you compare the combined federal and provincial 2018 personal income tax bill in each province and territory. A second calculator allows you to compare the 2017 combined federal and provincial personal income tax bill.

You'll also find our helpful 2018 and comparative 2017 personal income tax planning tools:

- ▶ An RRSP savings calculator showing the tax saving from your contribution
- ▶ Personal tax rates and credits, by province and territory, for all income levels

In addition, our site offers you valuable 2018 and comparative 2017 corporate income tax planning tools:

- ▶ Combined federal-provincial corporate income tax rates for small-business rate income, manufacturing and processing income, and general rate income
- ▶ Provincial corporate income tax rates for small-business rate income, manufacturing and processing income, and general rate income
- ▶ Corporate income tax rates for investment income earned by Canadian-controlled private corporations and other corporations

You'll find these useful resources and several others – including our latest perspectives, thought leadership, Tax Alerts, up-to-date 2018 budget information, our monthly TaxMatters@EY and much more – at ey.com/ca/tax.

Capital allocation and Canadian competitiveness survey: how government policy shifts are affecting Canadian business

Fred O'Riordan, Ottawa, and George Guedikian, Toronto
Originally published on ey.com



These are exciting but unsettling times for Canadian business. The performance of the Canadian economy continues to be strong across most sectors and regions of the country, but a number of external factors pose potential threats to sustained growth.

Chief among them is the direction being taken by the Trump Administration in the United States on a number of policy fronts that have cross-border tax, trade or regulatory implications.

These include:

- ▶ US tax reform
- ▶ North American Free Trade Agreement (NAFTA) renegotiations
- ▶ US deregulation

Policy decisions taken in the US could negatively impact business confidence in Canada, as well as capital formation, job creation, inbound and outbound investment and, ultimately, our international business competitiveness.

At the same time as trade protectionism is growing in the United States, several interprovincial trade disputes are brewing in Canada. These could be on the rise, further Balkanizing our already small domestic market and making it harder for Canadian companies to grow and realize the economies of scale and other efficiency attributes of larger international competitors. In general, a number of Canadian tax, regulatory and fiscal policies are moving in directions that may be unfavourable to business investment and growth here.

On the brighter side, some observers feel that two new multilateral trade agreements could have a net positive impact on the Canadian economy, namely:

- ▶ Comprehensive Economic and Trade Agreement (CETA)
- ▶ Trans-Pacific Partnership (TPP)

The impact other international policy developments may have, such as the upcoming Brexit negotiations, is less clear.

The ability to decide and directly influence outcomes on all of these policy fronts is largely in the hands of governments, but businesses are not indifferent to the direction these discussions and negotiations are taking, or their ultimate outcomes.

When considered together, how these various policy shifts will affect Canadian businesses on balance, in both scope and magnitude, is not entirely clear. But the potential implications are significant and the stakes are high.

To better inform decision-makers, and the public policy process in general, EY Canada commissioned Abacus Data to conduct a survey of a broad cross-section of Canadian business leaders to gauge the impact these policy shifts are either already having, or could have, on their business operations and future capital allocation plans.

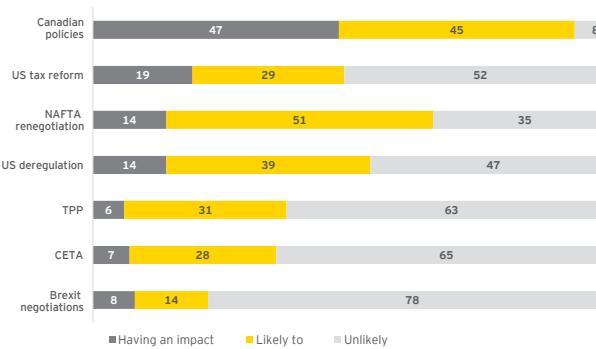
The survey was completed by 165 C-suite executives representing companies of different sizes and from different sectors and regions of Canada. Their views were also sought on what policy responses the federal government should be considering.

Business plans affected by tax and trade

The majority of those surveyed say that Canadian tax, regulatory and fiscal policy, as well as the NAFTA renegotiations, are already having or will have an impact on their own business plans. About half say US tax reform and US deregulation are having or will have an impact.

A significant minority of the respondents also foresee an impact from TPP and CETA. Most, however, do not anticipate an impact on their business plans as a result of the Brexit negotiations.

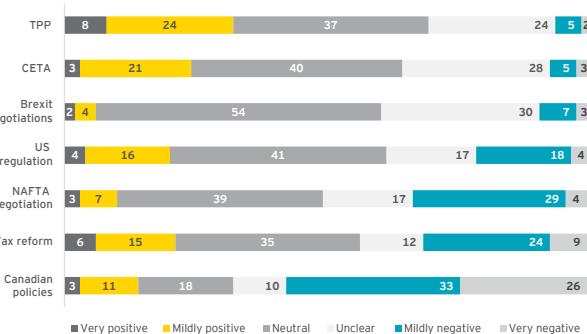
Impact on your business plans



As might be expected, larger firms and those that currently operate in the US (which represent about half of our sample) are considerably more likely to say that their business plans will be impacted by US tax reform.

One in three respondents (33%) expects US tax reform to have a negative competitive impact on their own business, and a similar number say the NAFTA renegotiations are likely to as well. Strikingly, a clear majority (59%) expect Canadian tax, regulatory and fiscal policies to have a negative competitive impact on their companies. This question also garnered the lowest “unsure/unclear as yet” response (10%).

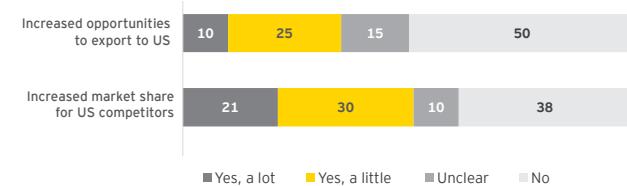
Likely impact on your company



Businesses that currently operate in the US tend to anticipate more upside than downside from US tax reform, while the opposite is true of other companies.

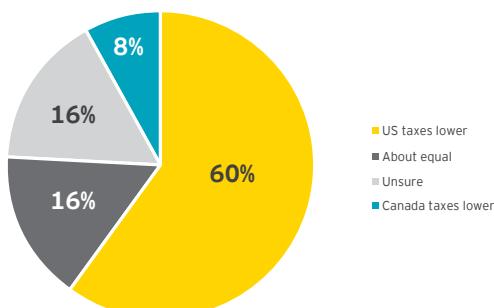
Approximately one in three respondents (35%) says that US tax reform is likely to stimulate the US economy in such a way as to create increased opportunities for them to export to the US. However, half (51%) say it will still result in US-based competitors having a greater market share of the business they compete for, whether in Canada or elsewhere.

Likely impact of US tax reform



Most (60%) believe that as a result of US tax reform, their business will find US tax rates will be lower than the corporate tax rates they face in Canada.

Will US tax reform mean that taxes for your business will be lower there?

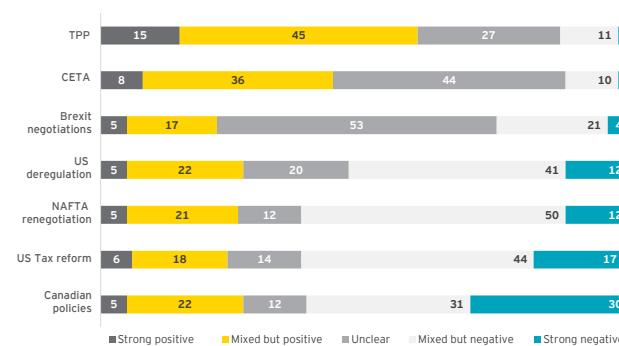


Negative impact on Canada's economy

Shifting to respondents' views concerning macroeconomic impacts, the majority of executives in our survey believe that the renegotiation of NAFTA, US deregulation and US tax reform will have a negative impact on the Canadian economy as a whole. A similar number indicate they feel that Canadian tax and regulatory policy is having a negative effect.

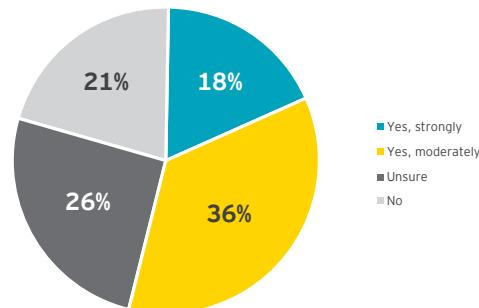
Opinions on TPP and CETA are decidedly more positive. Opinion is mixed about the potential impact of Brexit.

Impact on Canada's economy



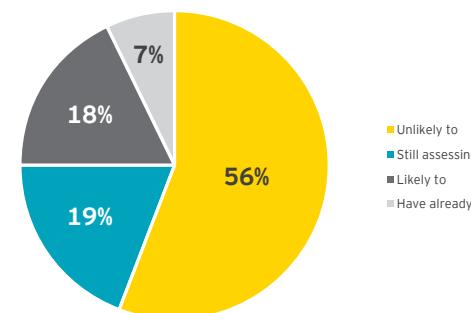
Just over half of those surveyed (54%) anticipate that US tax reform will result in "a shift of functions, risks or revenues out of Canada and into the US, and that tax liabilities will be lower in Canada and higher in the US." Among firms with revenues above CDN\$500 million, the proportion was 60%, and among companies with more than 500 employees it was 64%.

Will US tax reform lead to a shift of risk functions or revenues to the US from Canada?



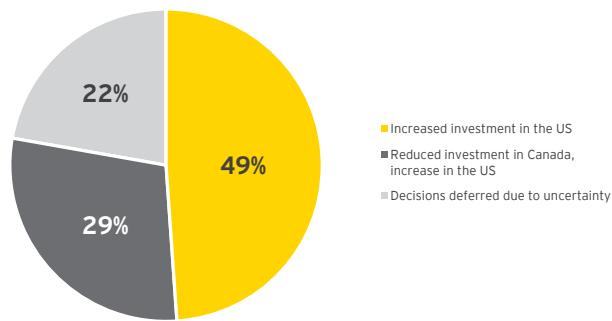
Respondents indicate that adjustments in their company's capital allocation intentions to US tax reform are in the early stages. Only 7% say they have already adjusted and another 18% say they are planning to, while 19% indicate that they are still assessing the situation and 56% say they are unlikely to change their plans. Among firms already operating in the US, 9% have changed already, 26% say they are likely to, and 43% are unlikely to. Larger companies are about 10 percentage points more likely to indicate that their capital allocation plans will change.

Has/will US tax reform change your capital allocation plans?



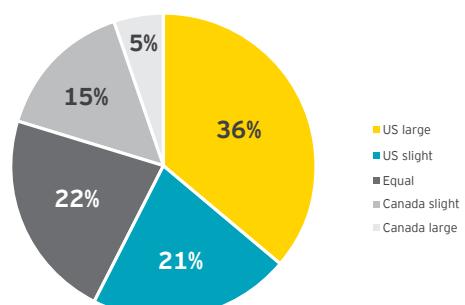
Asked what best describes the likely impact on their business plans, half say they will likely increase investment in the US, another 29% said they will shift investment from Canada to the United States, and 22% said decisions will be deferred due to uncertainty, at least for the time being. Among businesses that currently operate in the US, 33% foresee cutting investment in Canada and increasing it in the US, and another 53% anticipate increasing their investment in the US.

US tax reform: most likely impact on your plans



Respondents were also asked how changing personal tax levels and regulations affecting labour mobility in both countries are impacting the competition for talent. Most feel the US has an advantage (57%) compared to Canada (20%), while 22% feel that the countries are equally competitive. Larger employers (those with more than 500 employees) are less likely to perceive that the US has an advantage in attracting talent than smaller employers (50% compared to 61%).

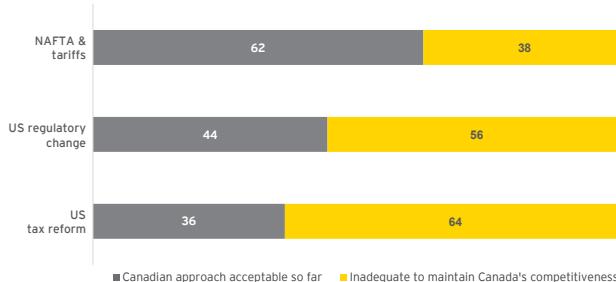
Which country will have an advantage for the talent you need?



Policy response by the Canadian Government

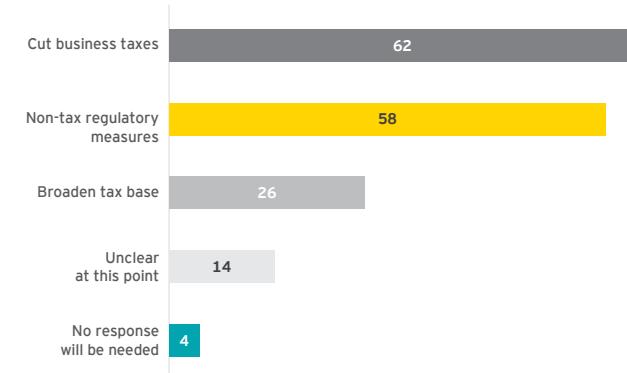
Respondents feel that the Canadian Government has been taking an acceptable approach so far in dealing with NAFTA renegotiations and tariff discussions with the US, but a clear majority (56%) say not enough is being done to ensure competitiveness with the US regulatory changes. An even larger majority (64%) feel more needs to be done to maintain our tax competitiveness with the US, and that number rises to 71% among firms currently operating in the US.

How do you feel about the approach Canadian authorities are taking?



In terms of specific actions that Canada should take, almost two thirds (62%) believe business tax rates should be reduced, while 58% believe reductions in red tape and regulation are required. Only 26% of respondents support a broadening of the business tax base (i.e., through elimination of selected tax incentives).

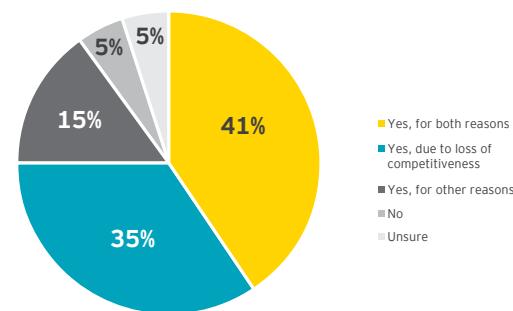
What type of response will be needed by Canada?



Strong support for a comprehensive tax policy review

Fully 90% believe that Canada needs a comprehensive tax policy review, with many respondents seeing the US tax moves as a significant new impetus for such a review.

Is a comprehensive tax review needed in Canada?



By an overwhelming margin (80%), respondents would prefer that such a policy review be done at arm's length by a special commission of appointed tax experts, rather than done internally by Finance Canada (20%).

Should a comprehensive tax review be done by Finance Canada or an outside expert commission?



Conclusion

As former Prime Minister Pierre Trudeau once famously quipped about the US, “Living next to you is in some ways like sleeping with an elephant. No matter how friendly and even-tempered is the beast, if I can call it that, one is affected by every twitch and grunt.”

With the significant policy shifts south of the border in just the first 16 months of the Trump Administration, as well as geopolitical events elsewhere, Canadian executives are feeling the impact in many ways. The response of the federal government to these concerns, and the speed of that response, will dictate how competitive Canada will remain in the short term, and could have a significant impact on business leaders' decisions to recruit and retain, or even remain, in Canada in the long term.

We believe the responses in this survey could help inform the Canadian Government's approach and help businesses reap the benefits of policy changes beyond our borders.

About the survey

This survey was completed by 165 Canadian C-suite executives online from 5 April to 2 May 2018 by the polling firm Abacus Data on behalf of EY Canada. There were 80 interviews from a sample of executives at Canadian companies from a third-party panel. The remaining 85 interviews were recruited from a list of EY clients. More than half the sample comes from companies with an annual gross revenue of over CDN\$100 million and comprises a mix of CEOs, CFOs, other C-suite and board members.



Tax officials examine procurement

As one consequence of tax changes, the recently enacted multilateral instrument convention will have an impact on procurement.

*Alex Postma, EY Global International Tax Services Leader
Originally published in "EY Tax Insights"*



Businesses have been confronted with many new tax developments demanding headline attention such as the tariff proposals in the US, mandatory disclosure rules and the digital tax phenomenon in the EU.

But there are also a number of tax changes underway that don't draw the same media focus but can nevertheless significantly affect the global business operations of multinational enterprises (MNEs). The impact the recently enacted **multilateral instrument (MLI)** convention will have on procurement is one consequence of those changes.

"Given the consequences that may lie ahead, now is the time for multinationals to begin stress testing their procurement functions."

In the last three decades, procurement has evolved from a business support function focusing mainly on cost management to a key value driver for many MNEs.

Procurement teams are now engaged in managing group demand, maintaining supplier relationships and strategically sourcing inputs or overseeing quality control, and are also increasingly influencing product design and supplier integration in the supply chain to more strategically drive long-term cost leadership.

Country-by-country reporting

The increased importance of the procurement function has not escaped the attention of tax authorities. For example, the **country-by-country report (CbCR)** that multinationals were obligated to file in many countries for the first time by 31 December 2017 specifically required multinationals to indicate which entities are involved in procurement functions.

Also, the **CbCR handbook on effective tax risk assessment** from the Organisation for Economic Co-operation and Development (OECD) mentions “procurement entities in jurisdictions other than its manufacturing locations” as a risk indicator to which countries’ tax authorities should pay special attention.

Additionally, the master file demands a special section be completed in which the multinational must describe its supply chain and provide an analysis of the various functions performed along the supply chain.

The CbCR and the master file are not the only instruments available to the tax authorities. The 2017 change of the OECD model treaty and commentary strips procurement of its “automatic” preparatory and auxiliary status and consequently from the automatic application of the exemption from the creation of a taxable presence.

Furthermore, even when the activities of a single entity are preparatory and auxiliary, countries may now elect to ignore this exemption if the procurement activities are part of a cohesive business operation with other group entities in the jurisdiction of the procurement activity (the so-called anti-fragmentation rules).

Separately, a change in the OECD model treaty concept of agency permanent establishment (PE) will affect procurement operations, as agency was previously limited to “concluding contracts” but now more broadly includes activities “leading to the conclusion of contracts.”

“The game is on”

These changes to limit the application of the preparatory and auxiliary exemption and expand the agency definition have been adopted by the majority of the approximately 80 countries that have signed or are expected to sign the MLI convention, which should accelerate the adoption of these changes by the 2,300 or so existing tax treaties between the participating countries.

And with Slovenia’s ratification in March, this MLI convention has now entered into force and will be effective for any particular combination of countries six months after both jurisdictions have ratified the instrument.

In other words, the “game is on,” and a leading practice for multinationals is to thoroughly review their procurement activity ahead of the pending changes. Some areas to which companies with cross-border procurement activities need to pay particular attention are:

- ▶ **Overall procurement footprint.** This should be assessed and mapped against countries adopting changes to the PE rules in their treaties and/or domestic law.
- ▶ **Foreign rep offices or any other fixed presence in another country.** These may become taxable presences as a result of the loss of the application of the preparatory and auxiliary test, as well as the application of the anti-fragmentation rules.
- ▶ **Business travelers.** Business travelers who negotiate procurement contracts may be considered to play the principal role leading to the conclusion of contracts and may thereby create a tax presence for their principal.
- ▶ **Agents either related or unrelated to the multinational enterprise.** These agents may create a taxable presence if they exclusively or almost exclusively work for the same MNE.

Consequences

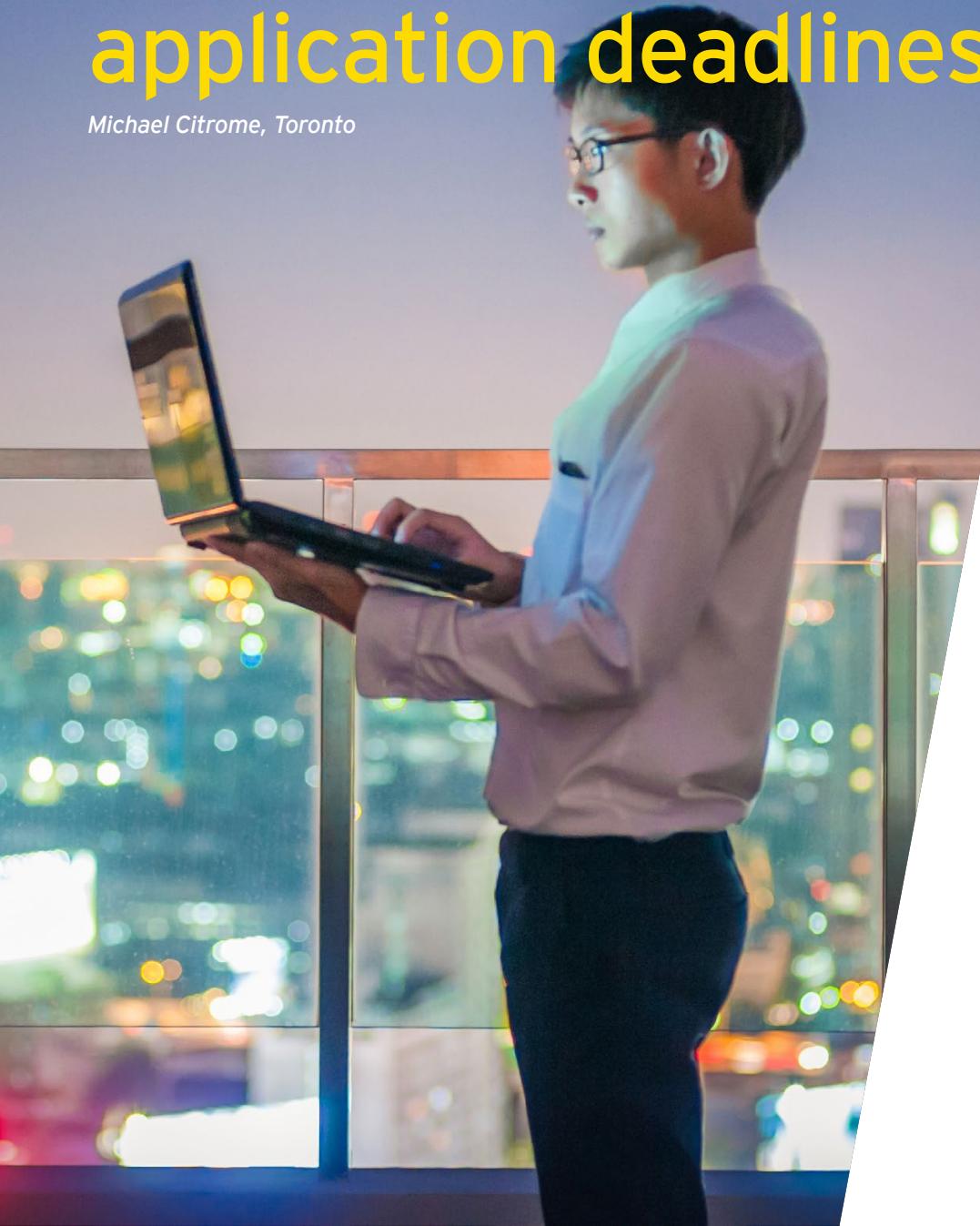
Once a taxable presence – in tax parlance, a “permanent establishment” – exists, tax consequences can start piling up: from corporation tax returns, transfer pricing reports, CbCR and master file obligations, to new tax liabilities, individual income tax compliance and social security obligations of business travelers to the jurisdiction.

Ignoring the new normal may come at a cost: countries have also over the past years sharpened their regimes for penalties and sanctions, with a number of countries now wielding potential criminal sanctions in addition to financial penalties for failure to report a PE. Given the consequences that may lie ahead, now is the time for multinationals to begin stress testing their procurement functions.



No relief possible for missed tax credit application deadlines

Michael Citrome, Toronto



The recent Quebec Court of Appeal decision in *Genetec inc. c. Agence du revenu du Québec* (2018 QCCA 730) (the QCA judgment) is more than just a cautionary tale for tax practitioners, it's a reminder that the tax legislation contains deadlines that, if missed by the taxpayer, cannot be extended by either the Minister or the courts.

As some of these deadlines relate to refundable tax credits, as in this judgment, missing the deadline will result in being disqualified for the credit, potentially a very costly outcome for both the taxpayer and its professional advisors.

The QCA judgment concerned the Quebec e-business tax credit, which provides qualified taxpayers an annual tax credit of up to \$25,000 per eligible employee. Although Revenu Québec administers the credit, the qualification certificate is issued by a different government agency.

Under the current provisions of s. 1029.6.0.1.2 of the Quebec Taxation Act (QTA), the qualification certificate must be submitted to Revenu Québec either within 12 months of the taxpayer's filing due date for that taxation year or, if getting the certificate takes longer, within 3 months of the certificate being issued.

The relief provisions of s. 36 of the Quebec *Tax Administration Act* (TAA) would generally allow the Minister to "at any time, extend the time limit fixed under a fiscal law to file a return or report or to furnish information," but the current provisions of s. 36.0.1 of the TAA state that s. 36 simply "does not apply in respect of the time limit for filing a prescribed form" for the purposes of the e-business tax credit and other similar credits.

Although the relevant provisions of the QTA and the TAA were drafted differently during the time period at issue, the effect was the same for practical purposes: miss the deadline, and you're out of luck.

Similar provisions apply to scientific research and experimental development (SR&ED) credits under s. 37(11) of the *Income Tax Act* (ITA), with a similar unfortunate outcome for taxpayers who miss the deadline.

In the QCA judgment, the taxpayer missed the filing deadline for the qualification certificate, and Revenu Québec declined to provide relief under s. 36 of the TAA on the basis that it simply had no discretion to do so; the taxpayer would have to lose the credit.

The taxpayer applied for judicial review to the Quebec Superior Court (QSC) on four grounds:

- 1) Revenu Québec's refusal was unreasonable because it did not relate to the explanation for the late filing.
- 2) It was arbitrary, as it was based solely on a technical computation of the deadlines set out in the statute.
- 3) The Revenu Québec decision did not respect the legislature's intention to develop the technology sector in Quebec, which is the purpose of the tax credit.
- 4) s. 36.0.1 of the TAA is unconstitutional because it circumscribes the judicial review power of the superior courts.

The QSC found that the refusal by Revenu Québec to allow the late-filing was reasonable, stating that the taxpayer was essentially asking the court to set aside s. 36.0.1 of the TAA on the basis that it is unfair to enact a technical provision of legislation that would prohibit the Minister from extending a time limit in circumstances where the facts would otherwise justify it. On appeal, the QCA agreed.

The QCA judgment brings to mind the many judgments of the Tax Court of Canada (TCC) on applications under s. 166.2 of the ITA for an extension to file a notice of objection. An application under s. 166.1 of the ITA must be made within a year of the expiration of the 90-day deadline for filing a notice of objection. If that deadline is missed, the TCC has no jurisdiction to overturn a CRA refusal of an extension.

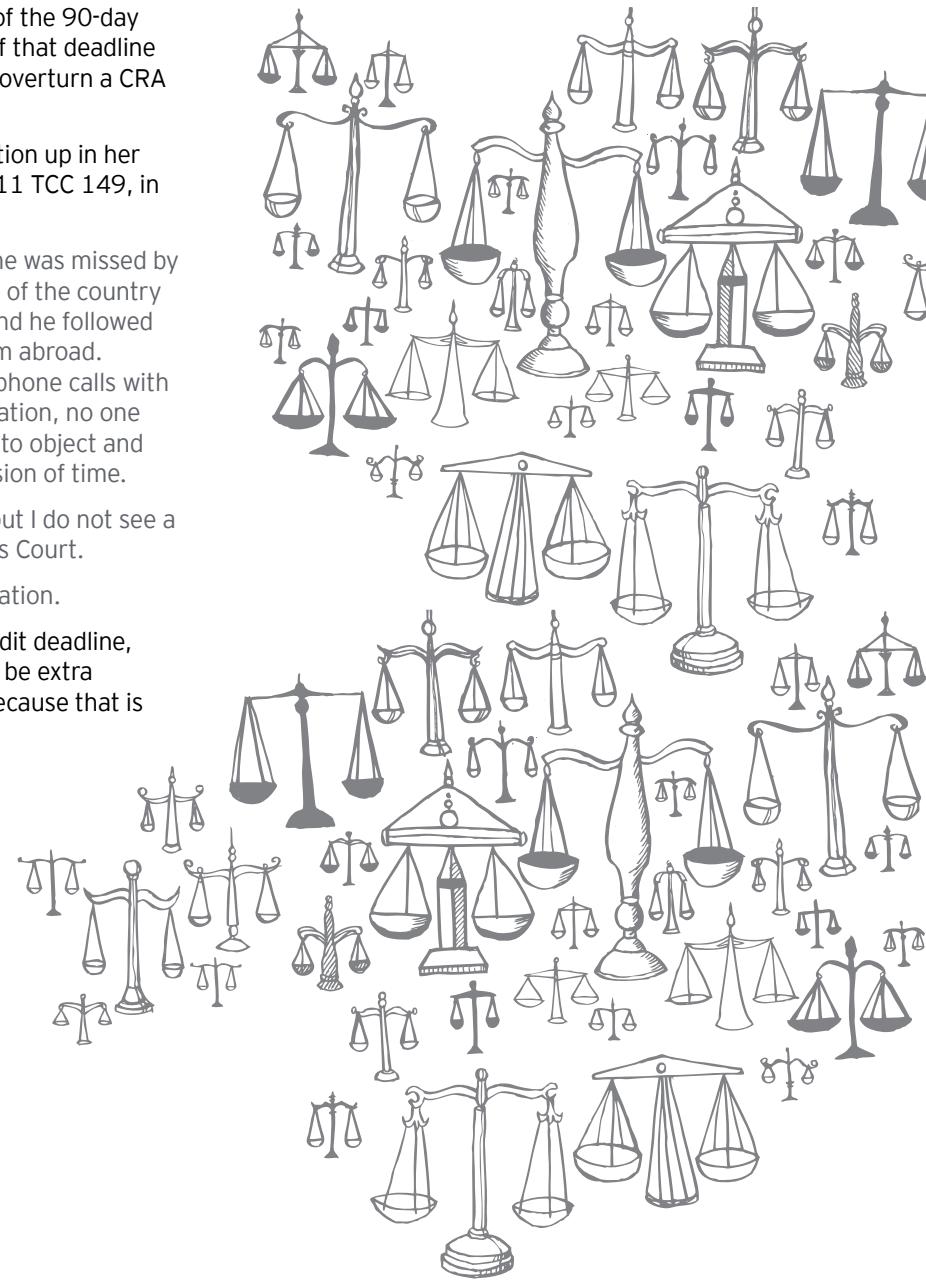
Justice Judith Woods summed the situation up in her judgment in *Vatasescu v The Queen*, 2011 TCC 149, in which she put it this way:

It is very unfortunate that the deadline was missed by a short period. The applicant was out of the country when the reassessment was issued and he followed up with the CRA as best he could from abroad. Despite the applicant having several phone calls with the CRA about supporting documentation, no one apprised him that he was out of time to object and that he needed to apply for an extension of time.

The circumstances are sympathetic but I do not see a way that relief can be provided by this Court.

With regret, I must dismiss the application.

Knowing the hazards of a missed tax credit deadline, both taxpayers and professionals should be extra cautious about their filing obligations, because that is one mistake that cannot be undone.



Publications and articles

Tax Alerts – Canada

Tax Alert 2018 No. 23 – Tariffs coming on some US products

Effective 1 June 2018, the United States followed through on its announcement to impose general tariffs on certain imports of Canadian steel and aluminum products. In response, Canada proposed retaliatory measures against CDN\$16.6 billion worth of US imports of steel, aluminum and many finished goods.

Tax Alert 2018 No. 24 – Final import surtaxes on certain US products

Effective 1 July 2018, Canada imposed a 25% or 10% surtax on steel and aluminum products and many consumer goods originating in the United States. The Canada Border Services Agency issued Customs Notice 18-08 clarifying the application of the surtaxes and discussing exclusions therefrom, as well as the applicability of Canada's duty deferral and drawback regimes to re-exports of such goods or goods containing or incorporating manufacturing from such goods. The revised list of covered tariff items is provided in the *United States Surtax Order (Steel and Aluminum)* and the *United States Surtax Order (Other Goods)*.

Tax Alert 2018 No. 25 – Sales and use tax ramifications following US Supreme Court decision

On 21 June 2018, the United States Supreme Court issued its ruling in *South Dakota v. Wayfair*. As a result of the Court's decision, e-commerce vendors may be required to collect and remit South Dakota sales tax for sales made to South Dakota consumers, even where such vendors do not have any offices, warehouses or employees in the state. Compliance costs for Canadian online vendors could increase substantially if other states decide to enforce sales tax legislation similar to that of South Dakota.

Publications and articles

EY's Global Capital Confidence Barometer

The 18th edition of EY's *Global Capital Confidence Barometer* shows 78% of Canadian companies intend to pursue M&A in the next 12 months, an all-time high in survey history.

EY's Worldwide Personal Tax and Immigration Guide 2017-18

This guide summarizes personal tax systems and immigration rules in more than 160 jurisdictions, including Australia, Brazil, Canada, France, Germany, Mexico, the Netherlands, the Russian Federation, the UK and the US.

EY's Worldwide Capital and Fixed Assets Guide 2017

The *Worldwide Capital and Fixed Assets Guide* helps our clients navigate the rules relating to fixed assets and depreciation. It summarizes the complex rules relating to tax relief on capital expenditures in 27 jurisdictions and territories.

EY's Worldwide Estate and Inheritance Tax Guide 2017

EY's Worldwide Estate and Inheritance Tax Guide summarizes the estate tax planning systems and describes wealth transfer planning considerations in 37 jurisdictions around the world, including Australia, Canada, China, France, Germany, Italy, the Netherlands, the UK and the US.

Worldwide Corporate Tax Guide 2017

Governments worldwide continue to reform their tax codes at a historically rapid rate. Chapter by chapter, from Afghanistan to Zimbabwe, this EY guide summarizes corporate tax systems in 166 jurisdictions.

Worldwide VAT, GST and Sales Tax Guide 2018

This guide summarizes the value-added tax (VAT), goods and services tax (GST) and sales tax systems in 122 jurisdictions, including the European Union.

Worldwide R&D Incentives Reference Guide 2017

The pace at which countries are reforming their R&D incentives regimes is unprecedented. This EY guide summarizes key R&D incentives in 44 jurisdictions, and provides an overview of the European Union's Horizon 2020 program.

2017-18 Worldwide transfer pricing reference guide

The proliferation of transfer pricing rules and regulations around the world, and the huge increase in focus on the subject by the world's tax authorities, require practitioners to have knowledge of a complex web of country tax laws, regulations, rulings, methods and requirements. This guide summarizes the transfer pricing rules and regulations adopted by 119 countries and territories.

Board Matters Quarterly

The June 2018 issue of Board Matters Quarterly includes three articles from the EY Center for Board Matters. Topics include the implications of US tax reform for compensation committees, an analysis of directors elected to Fortune 100 boards in 2017, and how boards can best anticipate and plan for geopolitical and regulatory changes.

EY Trade Watch

This quarterly publication outlines key legislative and administrative developments for customs and trade around the world. Highlights of this edition include imposition of various US tariffs and multiple retaliatory actions; recent decisions of the Brazilian higher courts, and the Canadian perspective on the Comprehensive and Progressive Agreement for Trans-Pacific Partnership, among other topics.

Publications and articles

Websites

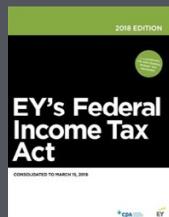
EY Law LLP

Our national team of highly qualified lawyers and professionals offers comprehensive tax law services, business immigration services and business law services. Serving you across borders, our sector-focused, multidisciplinary approach means we offer integrated and comprehensive advice you can trust. Visit eylaw.ca.

Focus on private business

Because we believe in the power of private mid-market companies, we invest in people, knowledge and services to help you address the unique challenges and opportunities you face in the private mid-market space. See our comprehensive private mid-market **webcast series**.

CPA Canada Store



EY's Federal Income Tax Act, 2018 Edition

Editors: Alycia Calvert, Warren Pashkowich and Murray Pearson

Complete coverage of Canada's *Income Tax Act* and Regulations.

Included with this edition: interactive online features and purpose notes for selected provisions. Purchase of a print book includes access to an online updated and searchable copy of the federal *Income Tax Act* as well as the PDF eBook. This edition contains amendments and proposals from the February 27, 2018 federal budget tax measures, Bill C-63 (SC 2017, c. 33), *Budget Implementation Act*, 2017, No. 2, the December 13, 2017 amendments to the *Income Tax Act* and Regulations (income sprinkling), and the October 24, 2017 notice of ways and means motion.

Online tax calculators and rates

Frequently referred to by financial planning columnists, our mobile-friendly calculators on ey.com/ca let you compare the combined federal and provincial 2017 and 2018 personal tax bills in each province and territory. The site also includes an RRSP savings calculator and personal tax rates and credits for all income levels. Our corporate tax-planning tools include federal and provincial tax rates for small-business rate income, manufacturing and processing rate income, general rate income and investment income.

Tax Insights for business leaders

Tax Insights provides deep insights on the most pressing tax and business issues. You can read it online and find additional content, multimedia features, tax publications and other EY tax news from around the world.

The Worldwide Indirect Tax Developments Map

Updated monthly, our interactive map highlights where and when changes in VAT, Global trade and excise duties are happening around the world. The map can be filtered by tax type, country and topic (e.g., VAT rate changes, compliance obligations and digital tax).

To subscribe to *TaxMatters@EY* and other email alerts, visit ey.com/ca/EmailAlerts.

For more information on EY's tax services, visit us at ey.com/ca/Tax.

For questions or comments about this newsletter, email Tax.Matters@ca.ey.com.

And follow us on Twitter [@EYCanada](https://twitter.com/EYCanada).



About EY

EY is a global leader in assurance, tax, transaction and advisory services. The insights and quality services we deliver help build trust and confidence in the capital markets and in economies the world over. We develop outstanding leaders who team to deliver on our promises to all of our stakeholders. In so doing, we play a critical role in building a better working world for our people, for our clients and for our communities.

EY refers to the global organization, and may refer to one or more, of the member firms of Ernst & Young Global Limited, each of which is a separate legal entity. Ernst & Young Global Limited, a UK company limited by guarantee, does not provide services to clients.

For more information about our organization, please visit ey.com/ca.

© 2018 Ernst & Young LLP. All Rights Reserved.

A member firm of Ernst & Young Global Limited.

2726781

ED None

This publication contains information in summary form, current as of the date of publication, and is intended for general guidance only. It should not be regarded as comprehensive or a substitute for professional advice. Before taking any particular course of action, contact EY or another professional advisor to discuss these matters in the context of your particular circumstances. We accept no responsibility for any loss or damage occasioned by your reliance on information contained in this publication.

ey.com/ca