



# Your one-stop shop on all areas of corporate tax

**CORPORATE TAX CENTRE ON TAXNET PRO™**

The intelligence, technology and human expertise you need to find trusted answers.



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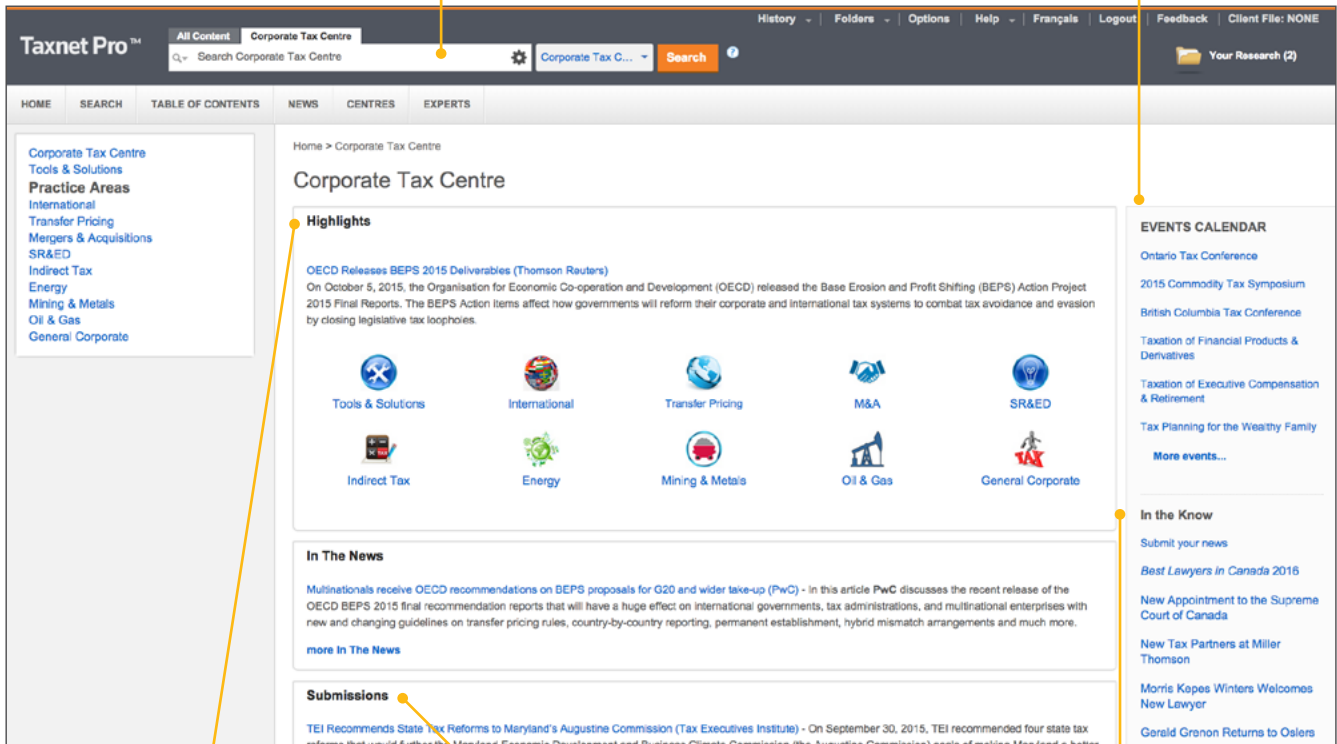
# Get all the information for the answers you need in one place

For corporate tax guidance, research, and analysis, the **Corporate Tax Centre** is unmatched. It gathers information from multiple sources, and organizes it into a practical format to make it easier for you to find the answers you need instantly.

Access the latest news, newsletters, analysis, legislation, and government documents covering a range of practice areas, including: International Tax, Transfer Pricing, Mergers and Acquisitions, SR&ED, Indirect Tax, Resource Taxation, and General Corporate Tax all integrated into an interface built specifically for the corporate tax professional.

Search corporate tax documents exclusively

View a calendar of tax events occurring across the country



Features weekly editorially selected key topics

Provides unique insights from various associations and corporations

Keeps you current with what's happening in the corporate tax community

# Workflow tools designed to increase efficiency and save time

Save time with interactive calculators, checklists, and quick reference tables plus instant access to submissions, treaties, and government directories.

The screenshot shows the Taxnet Pro website interface. At the top, there is a navigation bar with 'All Content' and 'Corporate Tax Centre' tabs, a search bar, and a 'Search' button. Below the navigation bar, there are tabs for 'HOME', 'SEARCH', 'TABLE OF CONTENTS', 'NEWS', 'CENTRES', and 'EXPERTS'. The main content area is titled 'Tools & Solutions' and is divided into six columns:

- CHECKLISTS:** Acquisition of Control, Amalgamations (s. 87), Capital Dividend Election, Property Transferred to Canadian Partnership, Eligible Dividends, Rollovers (s. 85), Stock Options (s. 7), Wind-up/Liquidation (s. 88), Employed vs. Self-Employed, Advance Pricing Agreements, Corporate Status, Assessments, Dissolving a Corporation.
- CALCULATORS:** Instalment Interest Calculator, Corporate Tax Integration and CCPC Thresholds Calculator, Late-Filing Penalties and Interest Calculator, Lease Deduction Calculator, Standby Charge Calculator, CCA Map Calculator, Tax Shield Calculator, Present Value of a Single Sum, Future Value of a Single Sum, Present Value of an Ordinary Annuity, Future Value of an Ordinary Annuity, Payback Period Calculator, Days Plus X Days Calculator, Days Between Two Dates Calculator.
- TAX RATE TABLES:** Substantively Enacted Rates, Income & Capital Tax Rates, Automobile Limits, Treaty Withholding Tax Rates, Prescribed Interest Rates 2004-2015, Prescribed Interest Rates for Leasing Rules, Provincial Sales Tax Rates, Federal Research and Development (R&D) Tax Incentives, Provincial/Territorial Research and Development (R&D) Tax Incentives.
- GUIDES:** Capital Cost Allowance Guide, McCarthy Tétrault Quick Reference Guide, McCarthy Tétrault Tax Elections Guide, McCarthy Tétrault Depreciable Property Quick Reference Guide.
- CALENDARS:** Corporate Compliance Calendar S-1 (overview), S-2 (calendar), S-3 (filing), S-4 (penalties).
- SCHEDULES AND TRACKERS:** Legislative Tracker - Income Tax Act, Legislative Tracker - Excise Tax Act, Legislative Tracker - British Columbia, Legislative Tracker - Ontario, Legislative Tracker - Quebec, T2 Schedule 1 Quick Reference Table.

# Fast access to breaking tax news and expert interpretation by practice area

Practice-specific news, interpretation, analysis, and key documents in all corporate tax practice topical areas.

Access the latest news, newsletters, analysis, legislation, and government documents covering a range of practice areas – International, Transfer Pricing, Mergers & Acquisitions, SR&ED, Indirect Tax, Energy, Mining & Metals, Oil & Gas, and General Corporate Tax.

The screenshot shows the Taxnet Pro website interface for the 'International' section. At the top, there is a navigation bar with 'All Content' and 'Corporate Tax Centre' tabs, a search bar, and a 'Search' button. Below the navigation bar, there are tabs for 'HOME', 'SEARCH', 'TABLE OF CONTENTS', 'NEWS', 'CENTRES', and 'EXPERTS'. The main content area is titled 'International' and is divided into three columns:

- McCarthy:** In The News, Commentary, Government Documents.
- McCarthy Tétrault Newsletters:** In this edition of Corporate Tax Centre's International Newsletter, Angelo Discepolo discusses the foreign accrual property income, or FAPI, and the amendments made to it in the 2014 and 2015 federal budgets; Jeremy Ho discusses proposed amendments for Reg. 102 withholdings by non-resident employers; and Ryan Rabinovitch gives a Canadian perspective on the OECD BEPS Action Project concerning treaty shopping.
- McCarthy Tétrault Executive Brief on International Tax:** This November 2014 edition of the Corporate Tax Centre International Tax Executive Brief provides an overview of the principal international taxation rules contained in the Income Tax Act in two parts: the first discusses principal tax considerations that apply to a non-resident corporation that carries on business activities in Canada; while part two describes the foreign tax credit rules applicable to foreign-source income earned directly by a Canadian-resident corporation.

Below the main content, there are links for 'more McCarthy Newsletters' and 'more McCarthy Executive Briefs'. A 'Spotlight on Stefanie Morand' section features a photo of Stefanie Morand and a short biography: Stefanie Morand, McCarthy Tétrault LLP, is a partner in the firm's Tax Group in Toronto. She maintains an income tax planning practice, with a focus on the tax-related aspects of mergers and acquisitions, corporate reorganizations and financings. She also frequently acts on tax structuring matters for Canadian pension plans and other tax-exempt organizations. She is the recipient of numerous awards for academic achievement, including multiple law school awards in, amongst other areas, general tax, corporate tax, trusts and estates, and the Allen S. Berg MBA/LLB Graduating Award of Excellence for the highest standing in the combined program (See complete biography).

## Exclusive authoritative commentary and tax insights

**Principles of Canadian Income Tax Law, 9th Edition**, by Jinyan Li, Joanne E. Magee and J. Scott Wilkie has been cited and quoted with approval in a number of tax cases decided by the Supreme Court of Canada. This introduction to the Canadian income tax law emphasizes the principles of income tax law, the policies that underlie the system and the major features of the system. The authors explain complex statutory provisions by focusing on the fundamental principles and legislative purpose and rationale. Notable updates include the decisions of the Supreme Court of Canada in *Copthorne Holdings*, *Craig*, *Garron* and *GlaxoSmithKline* as well as the references to the Canadian Federal Budget.

**Fundamentals of Canadian Income Tax, Volume 1: Personal Tax**, by Vern Krishna, has been completely re-written to reflect all tax legislative changes since the 2009 edition. This edition includes numerous measures from the 2014 Federal Budget, revised federal and provincial tax rates, and significant new case law from the Supreme Court of Canada and the Federal Court of Appeal. Cited and quoted by the Supreme Court of Canada, the Federal Court of Appeal, and the Tax Court of Canada, this classic work is written by a well-respected lawyer with an extensive academic background as a law professor.

Tax law evolves annually with new budgets that introduce new concepts and an increasing volume of case law. In recent years, there has been a significant shift, both in statutory and case law, in the method of interpreting the *Income Tax Act*. This commentary captures all the significant changes in tax law, including statutory provisions, case law and the administrative practices of the Canada Revenue Agency. There have also been several major cases in the Supreme Court which are introduced in this commentary.

**Taxation of Corporations, Partnerships and Trusts**, by Norman C. Tobias, offers a clear overview of the income tax treatment of the three most common Canadian business and personal planning vehicles. The author analyzes each area of intermediary taxation in turn, referencing the relevant provisions of the *Income Tax Act*. Using each tax concept to build on discussion of the next concept, the author provides the structure and support needed to deepen your understanding of intermediary tax fundamentals. The focus is on the taxation of intermediaries: the corporation, the partnership and the trust (personal trusts, unit trusts and employment related benefits trusts). The author opens with a first-principles discussion of the interpretation of the *Income Tax Act* and the art of its reading. The application of the *Income Tax Act*, with relevant sections reproduced, is then covered in relation to Corporations and their Shareholders (Part I, Division B, sections 82-89); Partnerships and their Members (Part I, Division B, sections 96-103); and Trusts and their Beneficiaries (Part I, Division B, sections 104-108).

This comprehensive reference contains all relevant sections of the Act; numerical examples illustrating the application of complex taxation concepts; finding tools including a Table of Cases, a Table of Statutes, and a Topical index.

**Canadian Petroleum Tax Journal**, published by the Canadian Petroleum Tax Society (CPTS), features informed commentary on taxation and matters of concern to the resource industry. In 2010 Thomson Reuters became the official editors of this journal. Taxnet Pro contains issues as far back as 1988. Journals from 2010 and moving forward are also available as downloadable PDFs.

**Vern Krishna – Tax and International Business Research Centre** offers a quick way to view current and archived articles from Vern Krishna, who is also the author of many texts in tax, international tax, and business law. His writings are frequently cited by the Supreme Court of Canada and the Tax Court of Canada. Vern Krishna is Tax Counsel, Mediator and Arbitrator in the Tax Chambers LLP and also teaches tax law at the University of Ottawa. He has been active in both his professions – law and accounting.

**Newsletters** written by leading law and accounting firms and focusing on areas such as:

- **International Tax** written by the international tax team of McCarthy Tétrault and offers in-depth analysis and professional guidance on international tax. This newsletter is published approximately 4 times each year.
- **Transfer Pricing** written by the KPMG LLP transfer pricing team and provides news and analysis on tax policies regarding intercompany transfer pricing. This newsletter is published approximately 4 times each year.
- **Scientific Research and Experimental Development (SR&ED)** written by Deloitte and provides tax developments in research and development. This newsletter is published approximately 4 times each year.
- **Indirect Tax** written by Blakes and discusses tax issues faced by individuals and corporations in reference to GST/HST and Excise Taxes. This newsletter is published approximately 4 times each year.
- **General Corporate** offers authoritative commentary on tax issues faced by corporations. This newsletter is published approximately 6 times each year.
- **Mergers & Acquisitions (M&A)** focuses on tax issues related to mergers and acquisitions. This newsletter is published approximately 4 times each year.
- **Energy, Mining & Metals & Oil & Gas** are newsletters that are included as part of the Resource Taxation area within the Corporate Tax Centre.
  - **Energy** covers tax issues in the energy industry
  - **Mining & Metals** covers tax issues in the mining and metals industry
  - **Oil & Gas** covers tax issues in the oil and gas industry

Other Topical Newsletters include:

- **Arbitrary Assessment** offers analysis and commentary on federal and provincial topics of interest (bilingual)
- **Blakes on Canadian Tax Controversy & Tax Litigation** covers recent developments in the area of tax controversy and litigation; Cases under Appeal, Cases of Note
- **From the Foreign Desk** covers tax developments from around the globe

## Search across all Corporate Tax Centre by content type

**Legislation** relating specifically to corporations. Some of this content, including Environmental legislation and *Partnership Acts*, is exclusive to Corporate Tax Centre.

- *Business & Companies Acts*
- *Competition Act*
- *Cross-Border Related Acts*
- *Customs Act*
- Environmental Legislation
- *Excise Act*
- *Excise Tax Act* and GST Regulations
- *Financial Administration Acts*
- Fuel Tax
- Income & Capital Tax
- *Insurance Acts*
- International Financial Activity
- *Interpretation Acts*
- *Partnership Acts*
- Payroll Tax
- *Pension Related Acts*
- *Property Related Acts*
- Remission Orders
- Reporting Standards
- Resource Tax
- Sales Tax
- Securities Legislation
- Other Legislation

**Treaties and Agreements** feature third party treaties to which Canada is not a signatory.

- Australia: all Australian treaties
- Ireland: all Irish treaties
- United States: all US treaties
- United Kingdom: all UK treaties
- Barbados: all Barbados treaties
- Tax Information Exchange Agreements
- Social Security Agreements
- Competent Authority Agreements
- FATCA Agreements

**Corporate Tax Centre** also includes practice specific newsletters and executive briefs written by leading law and accounting firms, including:

- McCarthy Tétrault on *International Tax*
- KPMG on Transfer Pricing
- Torys LLP on *Mergers & Acquisitions*
- Deloitte on *SR&ED*
- Blakes on Indirect Tax
- Various authors on General Corporate Tax, Resource Taxation, and M&A

**Government Directories** provide contact information (phone numbers and direct extensions) for ministerial employees who can answer relevant tax questions.

**Budgets** provide Federal budget documents from 2005 to date along with expert commentary. Provincial and territorial budgets dating back to 2005 are also included.

# Advantage Over Other Research Services

	Taxnet Pro	Other Services
Comprehensive Tax Content	<b>Three comprehensive tax libraries</b> Federal Income Tax, GST, and Provincial Tax – include all primary legislation, government documents, case law, and unsurpassed commentary.	No other service matches the extensiveness of commentary and level of integration.
	<b>More in-depth Commentary</b> Taxnet Pro commentary contains more author and expert contributions from numerous sources including McCarthy Tétrault and other leading authors covering a wide variety of tax topics.	No other service offers the depth and breadth of commentary as Taxnet Pro.
	<b>Specialty Destinations</b> Taxnet Pro has a greater capability of meeting the Tax Professionals' specific research needs. Seven powerful resources Corporate Tax Centre, Tax & Estate Planning Centre, Federated Press Centre, Tax Disputes & Resolution Centre, Customs & Excise Centre, Reference Centre, and APFF Centre are specialty areas within Taxnet Pro that provide you with the information and solutions you need to make informed business decisions.	Not available on other services.
Ease of Use	<b>Visual Indicators</b> Visual indicators help you keep track of work you have already done.	No other service has anything comparable to Taxnet Pro's visual indicators.
	<b>Search</b> The Quick Search box at the top of every page allows you to choose how you want to search. You can search widely with a general search or conduct a very specific search using the Query Builder and selecting a content type.	This flexibility is not matched on other services.
Canada's Most Advanced Tax Search Engine	<b>Sort and Filter Results</b> Lets you search broadly across all content and then sort by content type such as cases, statutes, and more. You can also narrow your list results by any applicable field.	No other service has this level of filtering capability.
	<b>Query Builder</b> The Query Builder allows you to create complex queries quickly and easily. It is available throughout the site and when used will build the Boolean terms and connectors query for you.	No other service offers this unique functionality to help you simplify your search process.
	<b>Search Templates</b> The search templates on Taxnet Pro provide a layer of granularity which allows you to focus in on just the documents you are interested in.	No other service facilitates your search through the use of search templates.
	<b>Table of Contents</b> Table of Contents allows you to navigate through all of the content on Taxnet Pro. This is one of the more popular methods of searching as it allows you to see exactly where your hits occur. Navigation is made easy with the ability to limit your view to just those documents which contain hits.	Although other services have a Table of Contents, they only show you what is within your subscription. With Taxnet Pro, be confident that you're never missing a key document.
Finding Tools	<b>Cross References</b> Not only does Taxnet Pro have the most cross references, with over six million, it is also the most easiest to use. With the ability to narrow your cross-references, search within them and preview any cross-reference document, we have created an efficient way to ensure yourself that no documents have been missed.	The document integration with other services is lacking in comparison and functionally resulting in the opportunity for missed documents.
Analyze and Organize More Efficiently	<b>Project Folders</b> Allows you to drag-and-drop key documents and save copy with reference snippets into folders organized by issue, client, or topic, which puts all vital information in one place for quicker access later. With Taxnet Pro, you can also create nested folders for better organization of your research.	No other service compares to the integrated foldering capabilities available on Taxnet Pro.
	<b>Copy with Reference</b> You can copy and paste text into your work product with all available references.	No other service offers this.

## Tax doesn't stand still. Neither does Taxnet Pro™

Tax professionals rely on Taxnet Pro every day to understand complex information, make informed decisions and use knowledge more efficiently. Taxnet Pro delivers an unsurpassed selection of outstanding industry specific news, analysis and commentary to keep you current with important developments in the industry, and legislative changes that can impact your clients. You'll have confidence knowing you're drawing from the most accurate and reliable authority.

On Taxnet Pro, you're never more than a few clicks away from the high quality content that gives you confidence your research is complete.

### Specialty Solutions

Our practice-specific products have been developed specifically to match how research is done in each practice area.

**Choose one or many to meet your practice needs.**

**APFF Centre**

**Corporate Tax Centre**

**Customs & Excise Centre**

**Federated Press Centre**

**Tax & Estate Planning Centre**

**Tax Disputes & Resolution Centre**

**OECD Collection**

**Reference Centre**

**Compliance Guides**

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