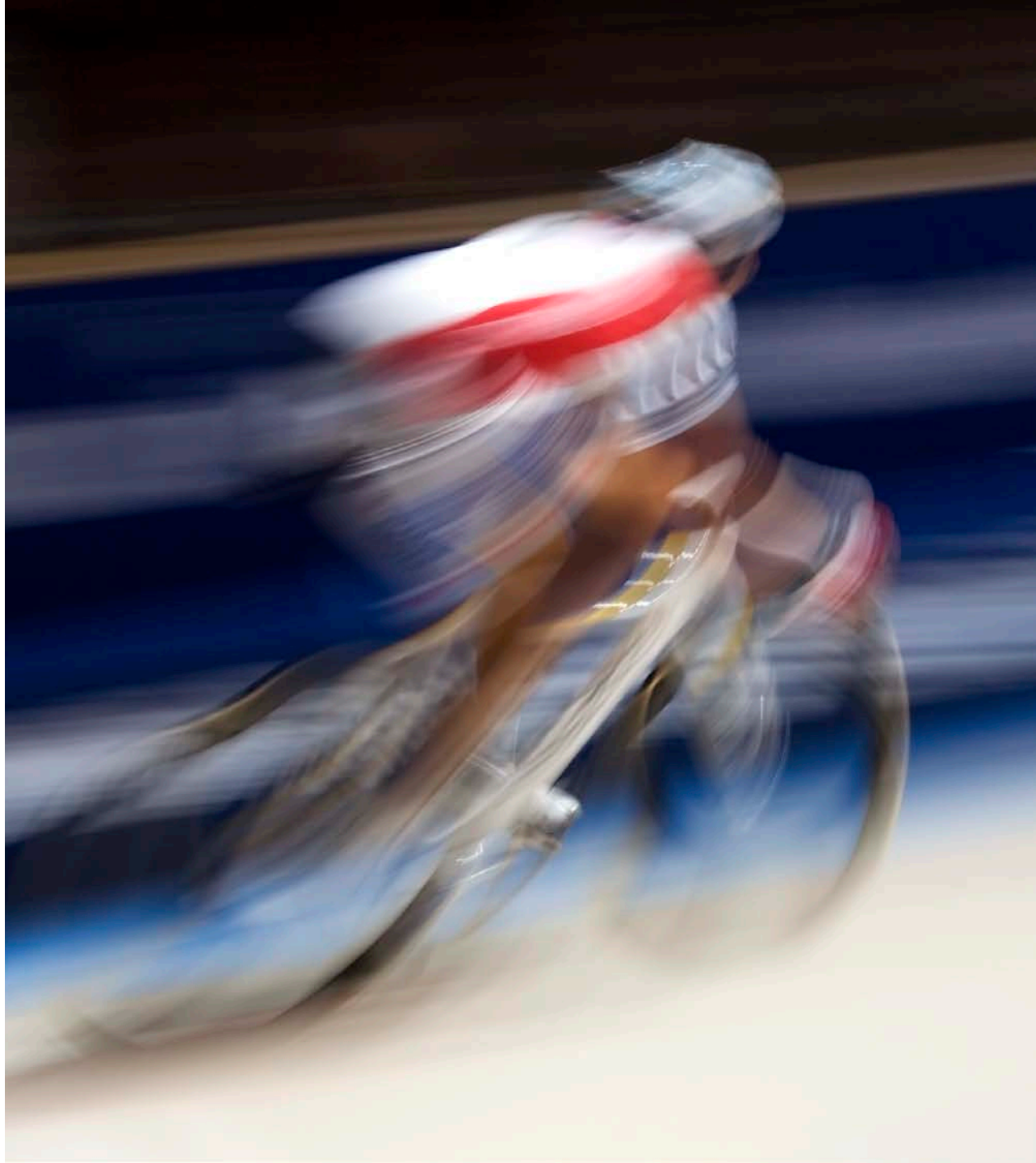




The Canadian Perspective: How Might BEPS Impact Canadian Multinationals and What Can You be Doing to Prepare

Michael O'Connor, Sun Life
Financial

March 1 - 4, 2015

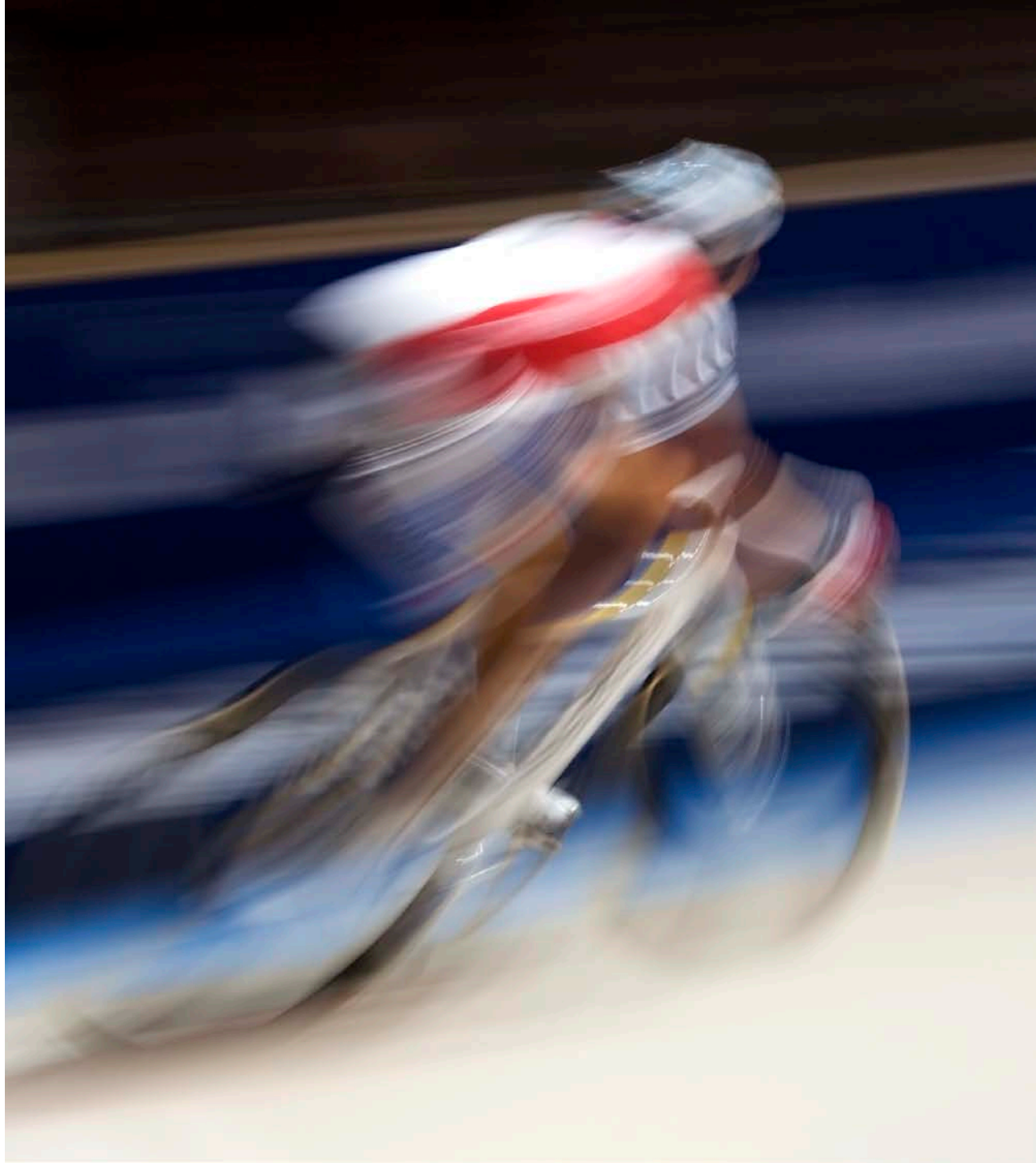




The Canadian Perspective: How Might BEPS Impact Canadian Multinationals and What Can You be Doing to Prepare

Shawn Porter, Deloitte Canada
Albert Baker, Deloitte Canada
Peter Corcoran, Deloitte Canada

March 1 - 4, 2015



Panel discussion questions

Question 1

Is the BEPS Project achieving its objectives or crumbling under its own weight? Where is it headed in general and in Canada in particular?

Question 2

In general, what have Canadian businesses been doing to assess the potential impact of BEPS on financing structures, transfer pricing based business models, and the prospect of enhanced reporting?

Panel discussion questions

Question 3

Should/Will Canada act on Action Item 2 (hybrid mismatch arrangements)? Why/why not? How should Canadian businesses prepare?

Question 4

Should/Will Canada act on Action Item 4 (interest deductibility)? Why/why not? How should Canadian businesses prepare?

Question 5

Should/Will Canada introduce a patent box? Is it possible to design a non-harmful regime?

Panel discussion questions

Question 6

What does the federal government's announcement on the treaty shopping proposals mean? How should businesses act in light of this?

Question 7

Will the federal government take early action on BEPS in the upcoming budget expected in April?

Question 8

How can industry have positive influence on federal actions in Canada?

Please remember
to complete your
evaluation

Speaker bios

Albert Baker is Deloitte LLP's Global Tax Policy Leader and the National Quality & Risk and Tax Policy Leader for the Canadian tax practice. He is a Partner and member of the firm's national Tax Executive and is currently based in Toronto. Albert led the firm's Canadian International Tax Services practice from 1997 to 2007 and led the firm's tax practice in Vancouver from 2005 to 2010. He was previously based out of the firm's Montreal office.

His technical specialty is in international tax and he has over 30 years of experience in structuring mergers and acquisitions, corporate financing, and corporate reorganizations. Albert is a frequent author and speaker on international tax and tax policy matters.

He was selected as one of the top tax advisers in Canada in the 2000 - 2014 Euromoney Legal Media Group Surveys and various International Tax Review (ITR) surveys. In 2011 and 2014 ITR recognized Deloitte Canada as the "Americas Tax Policy Firm of the Year". In 2004 Albert was awarded the title of Fellow of the Quebec Order of Chartered Accountants (now the Quebec Order of Chartered Professional Accountants) in recognition of distinguished services rendered to the profession.

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Speaker bios

Michael O'Connor is Senior Vice-President, Tax at Sun Life Financial headquartered in Toronto, Canada.

Michael is a chartered professional accountant and holds a BA (business administration) degree from Simon Fraser University, in British-Columbia, Canada.

Following the largest takeover in Canadian history (Rio Tinto's 2007 acquisition of Alcan), Michael joined Sun Life in December 2007 and currently leads a team of nearly 60 tax professionals in delivering timely tax advice and support to Sun Life's business and functional groups in over a dozen countries. Michael has traveled extensively and has direct experience in managing tax issues and dealing with tax authorities on six continents.

Prior to joining Sun Life, Michael was Chief Tax Officer for Alcan Inc. of Montreal. In addition, he spent 17 years with Ernst & Young in Toronto, including three years working as Ernst & Young's Canadian Tax Desk in London, England.

Michael is currently a Governor of the Canadian Tax Foundation and various tax related committees of various organizations including CPA Canada's Income Tax Education Committee.

Shawn Porter is a tax partner in the Toronto office of Deloitte. He practices in the areas of international tax and mergers and acquisitions. He has advised Canadian and foreign based multinationals on corporate and international tax planning matters for over 25 years. Shawn has extensive experience in structuring the ownership and financing of international investments. He serves a wide range of clients including private equity and other institutional investors, real estate, and consumer business. Shawn served as the Director of the Tax Legislation Division in the Tax Policy Branch (Department of Finance) on an Executive Interchange from 2011 to 2013.

He is a frequent speaker on tax matters at the Canadian Tax Foundation, International Fiscal Association and the Tax Executives Institute. He is a former governor and executive committee member of the Canadian Tax Foundation, is a council member of the International Fiscal Association (Canadian Branch), and a former member of the Joint Committee on Taxation of the Canadian Institute of Chartered Accountants and the Canadian Bar Association. Shawn is also a member of the Editorial Board of International Tax Planning by Federated Press and is active in the Waterloo Centre for Taxation in a Global Economy. He has served on the Board of Directors of Deloitte & Touche in Canada. Shawn graduated from the University of Waterloo's School of Accounting and Finance with a Bachelor of Arts degree and a Masters of Accounting and he is a Chartered Accountant.

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