

MLI Canada with Worldwide Tax Insights

Canadian MLI changes are entering into effect with an increasing number of countries. We can help you navigate the changes and find the information applicable to you.

Are you up to speed?

The OECD/G20 Multilateral Instrument to implement BEPS measures into tax treaties (*the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting, or MLI*) entered into force for Canada on December 1, 2019. The changes began coming into effect on January 1, 2020, and are applying to an increasing number of Canada's tax treaties.

The MLI is ratified for more than 50 of Canada's 94 tax treaties. Out of these MLI-ratified tax treaties, the MLI is now in effect for more than 45 of them with respect to Canadian withholding taxes.

The OECD's guidance materials do not directly show the impact of the MLI on Canada's bilateral tax treaties, so we've done the work for you. The MLI Canada with Worldwide Tax Insights collection simplifies navigation of the MLI's impact on Canada's bilateral tax treaties.

Without MLI Canada with Worldwide Tax Insights, to see the impact of the MLI on a bilateral tax treaty, you need to examine the provisions of the MLI and also take into account the interactions between the MLI notifications and reservations made by the respective countries. The results of this time-consuming review would then need to be translated and incorporated manually into each relevant bilateral tax treaty.

EY consolidated the MLI with all relevant Canadian treaties

For each Canadian tax treaty for which the MLI has been signed by the corresponding jurisdiction (not only the ones for which the MLI has been ratified), find:

- ▶ The amendments brought by the MLI (incorporated directly into the relevant treaties)
- ▶ When the amendments apply
- ▶ More supporting info (links to the MLI, the MLI explanatory notes, BEPS Action Reports, and the OECD Model Tax Convention all of which are reproduced within the collection)

A quick view summary table lets you know the status of each country and is updated as the MLI comes into force in additional countries.

BE CONFIDENT.

Be sure you've properly applied the treaty. Don't worry about missed steps, because EY tax professionals have performed this tedious mapping task for you.

SAVE TIME.

The online and linked database gives you immediate access to materials. Spend your time applying the treaty changes instead of having to identify the relevant applicable changes. This tool provides a very quick and easy overview of the impact of the MLI on any bilateral tax treaty.

ADDITIONAL MATERIALS.

With this product, you'll also receive access to EY BEPS tax alerts, BEPS commentary, the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent BEPS (MLI), Lists of notifications and reservations by relevant countries, and EY global tax alerts – all available in one searchable format.

This product is exclusive to EY!

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