

MLI Canada with Worldwide Tax insights

Canadian MLI changes are coming 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 apply to an increasing number of Canada's tax treaties.

The MLI is ratified for more than 40 of Canada's 94 tax treaties. Out of these MLI-ratified tax treaties, the MLI is now in effect for 35 of them with respect to Canadian withholding taxes (11 of which came into effect on January 1, 2021).

MLI Canada with Worldwide Tax insights 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, not only do you have to examine the provisions of the MLI, but also take into account an analysis of the interactions between the provisional or definitive MLI notifications and reservations made by the respective countries. The results would then have to be translated and incorporated into each relevant bilateral tax treaty. The assistance provided by the OECD materials does not show you the MLI impact directly into Canadian's bilateral tax treaties.

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
- ▶ When the amendments will apply
- ▶ More supporting info (links to the MLI, the MLI explanatory notes, BEPS Action Reports, and the OECD Model Tax Convention)

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