



ELECTION IN RESPECT OF LOANS FROM NON-RESIDENTS

DO NOT USE THIS AREA

- By virtue of this election, interest paid in Canadian currency to the PARENT CORPORATION in respect of money loaned to the SUBSIDIARY CORPORATION is not subject to withholding tax under Part XIII of the Income Tax Act.
This form must be jointly completed by the non-resident corporation (the PARENT CORPORATION) and the person resident in Canada or the non-resident insurance corporation carrying on business in Canada (the CREDITOR), from whom the parent corporation has borrowed money that has been loaned, in whole or in part, at the same interest rate, to a subsidiary wholly-owned corporation (the SUBSIDIARY CORPORATION) resident in Canada, where all the conditions described in section 218 of the Income Tax Act apply.
The principal business of the SUBSIDIARY CORPORATION must be the making of loans or alternatively, that subsidiary corporation must have re-loaned the money to its wholly-owned subsidiary, resident in Canada, whose principal business is the making of loans.
The election does not apply in respect of any payment of interest made more than 12 months before the date the election was filed.
Two completed copies of the election signed by the PARENT CORPORATION and the CREDITOR are to be filed at the Tax Centre of the SUBSIDIARY CORPORATION.

PARENT CORPORATION NAME OF NON-RESIDENT CORPORATION ADDRESS

CREDITOR NAME OF CREDITOR S.I.N. OR BUSINESS NUMBER (BN) ADDRESS TAX SERVICES OFFICE Creditor is: a resident of Canada, or a non-resident insurance corporation carrying on business in Canada

SUBSIDIARY CORPORATION NAME BUSINESS NUMBER (BN) ADDRESS TAX SERVICES OFFICE

WHOLLY OWNED SUBSIDIARY OF SUBSIDIARY CORP. NAME BUSINESS NUMBER (BN) ADDRESS TAX SERVICES OFFICE To be completed where the principal business of the SUBSIDIARY CORPORATION is not the making of loans, and that corporation re-loaned the borrowed money to its wholly-owned subsidiary which is resident in Canada and whose principal business is the making of loans.

INFORMATION REQUIRED 1. (a) Amount borrowed by the PARENT CORPORATION from the CREDITOR \$ (b) Date on which this amount was borrowed (c) Interest payable in Canadian currency at the rate of % per annum. 2. (a) Amount of borrowed money specified in 1(a) that was loaned by the PARENT CORPORATION to its SUBSIDIARY CORPORATION. \$ (b) Date on which this loan was made (c) Interest payable at the rate of % per annum. 3. Date on which loan was assigned to or acquired by the present creditor, if applicable

ELECTION AND CERTIFICATION The above-named PARENT CORPORATION and CREDITOR hereby jointly elect under subsection 218(3) of the Income Tax Act and certify that the information provided in this election is true, correct and complete in every respect. PARENT CORPORATION Authorized Officer Position or Office Date CREDITOR Individual or Authorized Officer Position or Office Date