*	Canada Customs and Revenue Agency	Agence des douanes et du revenu du Canada
	and Revenue Agency	et du revenu du Canada

ELECTION IN RESPECT OF LOANS FROM NON-RESIDENTS

- For use jointly by a non-resident corporation (the **PARENT CORPORATION**) and a person resident in Canada or a 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, to elect jointly 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.
- 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 non-resident withholding tax under Part XIII of the *Income Tax Act*.
- 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 Taxation Centre of the **SUBSIDIARY CORPORATION**.

NT ATION	NAME OF NON-RESIDENT CORPORATION														
PARENT CORPORATION	ADDRESS														
	NAME OF CREDITOR	SI	N (OR B	USIN	VES		JM	BFR	(BN)				
CREDITOR						S.I.N. OR BUSINESS NUMBER (BN)									
	ADDRESS	TA	xs	FRVI	CES		FICE								
		170		21111	020	0.	1102	-							
5	Creditor is:														
z	NAME					BUSINESS NUMBER (BN)									
SUBSIDIARY CORPORATION															
RPOR	ADDRESS	TA	хs	ERVI	CES	OF	FICE	5	L						
S O S															
	NAME	BU	SIN	IESS	NUN	/BE	R (B	N)							
WHOLLY OWNED SUBSIDIARY F SUBSIDIARY CORP.			1	1		T	Ì	Í		I	I	RC			
	ADDRESS	TA	xs	ERVI	CES	OF	FICE	 E							
LLY C IBSID SIDIA															
WHC SU OF SUE	To be completed where the principal business of the SUBSIDIARY CORPORATION is not the making of lo borrowed money to its wholly-owned subsidiary which is resident in Canada and whose principal business	bans is th	, ai e n	nd th nakir	at congregation	orp f loa	orati ans.	ion	re-lo	bane	ed th	ıe			
r	INFORMATION REQUIRED														
1	(a) Amount borrowed by the PARENT CORPORATION from the CREDITOR		- 9	\$								_			
	(b) Date on which this amount was borrowed		-	_								_			
	(c) Interest payable in Canadian currency at the rate of							_ %	6 pei	an	num	1.			
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		-					_ %	6 pei	an	num	۱.			
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 that the information provided in this election is true, correct and complete in every respect.	of the	e Ir	ncorr	ne Ta	эх л	Act a	and	cert	ify					
	DRPORATION Authorized Officer Position or Office					Г	Date				_				
						0	ulu								

DO NOT USE THIS AREA								

CREDITOR

Individual or Authorized Officer

Position or Office



Date