



AGREEMENT RESPECTING LIABILITY FOR PART VI.1 TAX (2005 and later tax years)

- Use this schedule to transfer all or a part of the Part VI.1 tax liability of a corporation (transferor corporation) to a related taxable Canadian corporation (transferee corporation) (section 191.3). Such transfers are beneficial where the transferor corporation does not have enough Part I tax to use the deduction for Part VI.1 tax under paragraph 110(1)(k).
The transferee corporation has to be related to the transferor corporation throughout a tax year of the transferor corporation and throughout the last tax year of the transferee corporation ending by the end of that tax year of the transferor corporation. Corporations that are related only because of a right referred to in paragraph 251(5)(b) cannot make this agreement. The Part VI.1 tax liability cannot be transferred if the two corporations are related only by virtue of being controlled by the federal or a provincial or territorial government.
An agreement or amended agreement has to be filed by the transferor corporation and the transferee corporation:
- no later than six months after the end of the transferor's tax year for which the Part VI.1 tax would otherwise be payable; or
- no later than 90 days after the mailing of a notice of assessment of Part I or Part VI.1 tax payable (or notification that no tax is payable) to either corporation for the tax year for which the agreement is filed.
The transferor and the transferee corporations have to attach certified copies of the resolutions of the directors (or the documents of persons legally entitled to administer the affairs of the corporation) authorizing such an agreement.
The transferee corporation has to include the amount of tax specified in this agreement in its Part VI.1 tax payable. The transferor corporation will deduct this amount from its Part VI.1 tax otherwise payable. Both corporations remain jointly and severally liable to pay the tax specified in this agreement, including any interest and penalties on this amount of tax.
Parts, sections, subsections, and paragraphs referred to on this schedule are from the federal Income Tax Act.
For more information, see the T2 Corporation Income Tax Guide.

Agreement

Date filed (do not use this area)

101

Year Month Day grid

It is hereby agreed that Part VI.1 tax in the amount of 105 is transferred from the transferor corporation to the related transferee corporation(s).

110 Name of transferor corporation, 115 Business Number, 120 Tax year-end (Year Month Day)

Table with 4 columns: Name of transferee corporation(s) (225), Business Number (230), Part VI.1 tax transferred \$ (233), Tax year-end to which this agreement applies (YYYY/MM/DD) (235). Rows 1-5.

Total (cannot be more than the Part VI.1 tax on line 105)

Total value input box