

# **TAX INSTRUCTION LETTER**

**FOR FORMER SHAREHOLDERS OF NORTHERN SUPERIOR  
RESOURCES INC. WHO ARE ELIGIBLE HOLDERS AND**

**WANT TO FILE A SECTION 85  
ELECTION**

**In connection with  
the plan of arrangement involving**

**Northern Superior  
Resources Inc.**

**and**

**IAMGOLD Corporation**

TO: Former Shareholders of Northern Superior Resources Inc. (the “**Company**” or “**Northern Superior**”) who are Eligible Holders (as defined herein) and wish to file a Section 85 Election

FROM: IAMGOLD Corporation (“**IAMGOLD**”)

RE: Obtaining a Section 85 Election (as defined herein) in connection with the acquisition by IAMGOLD of all of the issued and outstanding common shares of Northern Superior (“**Company Shares**”) pursuant to the Plan of Arrangement (the “**Arrangement**”)

---

This tax instruction letter is provided to beneficial owners of Company Shares who are Eligible Holders who wish to make a Section 85 Election for Canadian federal income tax purposes, and in certain cases, for Québec income tax purposes, in respect of Company Shares disposed of under the Arrangement for consideration that included Purchaser Shares (as defined below).

This tax instruction letter outlines how an Eligible Holder may make a Section 85 Election jointly with IAMGOLD. If you are not an Eligible Holder or you are an Eligible Holder who has decided not to file a Section 85 Election, this tax instruction letter is not relevant to you.

**The comments made in this tax instruction letter with respect to the income tax consequences of making a Section 85 Election are of a general nature only and are not intended to be, nor should they be construed to be, legal or tax advice to any particular Eligible Holder. Furthermore, apart from providing this tax instruction letter and enclosures to Eligible Holders for their convenience, neither IAMGOLD nor Northern Superior will provide Eligible Holders with any advice on making a Section 85 Election. Accordingly, Eligible Holders should consult with their own legal and/or tax advisors for specific advice in respect of whether or not to make a Section 85 Election, and how to comply with the requirements for making such an election having regard to their own particular circumstances.**

**Please review this tax instruction letter very carefully and consult your tax advisors as to the proper completion and delivery of the relevant tax election information to IAMGOLD (or its representatives), and the applicable filing deadlines.** You are referred to CRA Information Circular 76-19R3 and CRA Interpretation Bulletin IT-291R3 for further information respecting the joint income tax election with IAMGOLD pursuant to Section 85 of the *Income Tax Act* (Canada) (the “**Tax Act**”) (and any comparable provision of any other income tax law) (a “**Section 85 Election**”). In addition, and if applicable to you, you are referred to Revenu Québec Interpretation Bulletins IMP.520.1-1/R1, IMP.521.2-1/R1 and IMP.522-1/R1 for information respecting the equivalent election under the *Taxation Act* (Québec) (the “**Québec Act**”). **The comments in this tax instruction letter with respect to such tax elections are provided for general assistance only and are not intended to be, nor should they be construed to be, legal or tax advice. The law in this area is complex and contains numerous technical requirements not addressed in this summary.**

Eligible Holders are referred to the Company’s management information circular dated November 10, 2025 (the “**Circular**”) for further information. Capitalized terms used but not defined in this tax instruction letter have the meanings set out in the Circular. Eligible Holders are encouraged to read the Circular in its entirety.

## **The Arrangement**

Pursuant to the Arrangement, holders of Company Shares ("**Company Shareholders**") received for each Company Share held (i) CAD\$0.19 in cash, and (ii) 0.0991 of a common share of IAMGOLD (collectively, "**Purchaser Shares**") (collectively, the "**Consideration**").

On the Effective Date, the fair market value per Purchaser Share was CAD\$22.19. As such, the fair market value of the Consideration was CAD\$2.39, being the sum of CAD\$0.19 in cash and CAD\$2.20, the fair market value per 0.0991 Purchaser Share.

## **Eligible Holders and the Section 85 Election**

An "**Eligible Holder**" means a Company Shareholder (other than a Company Shareholder who validly exercises Dissent Rights) who is (a) a Person (other than a partnership or a Tax-Exempt Person) that is a resident of Canada for the purposes of the Tax Act, or (b) a partnership any member of which is a resident of Canada for the purposes of the Tax Act (other than a Tax-Exempt Person). A "**Tax-Exempt Person**" is a Person who is exempt from Tax under Part I of the Tax Act.

An Eligible Holder whose Company Shares were exchanged for the Consideration pursuant to the Arrangement is entitled to make a Section 85 Election jointly with IAMGOLD and may thereby defer all or a portion of any gain that might otherwise arise on the disposition of Company Shares as a consequence of the Arrangement. The effect and procedure for making a Section 85 Election is set out herein and is generally described in the Management Information Circular under "*Certain Canadian Federal Income Tax Considerations*".

Under the terms of the Arrangement, IAMGOLD has agreed to execute the necessary joint tax election form(s) for making a Section 85 Election for an Eligible Holder from whom a completed tax election form (the "**Section 85 Election Form**") is received by IAMGOLD (or an appointed representative) within 120 days after the Effective Date on December 19, 2025 (the "**Tax Election Deadline**") and to return a copy of the signed Section 85 Election Form by email to the Eligible Holder to the email address provided within 30 days after receiving the completed Section 85 Election Form.

Eligible Holders should review their own particular situation and consult with their tax advisors before making a Section 85 Election under the Tax Act (and a joint tax election under the Québec Act, if applicable).

Federal tax election form T2057 and, if applicable, Québec tax election form TP-518-V should be completed by Eligible Holders who are individuals, corporations or trusts; copies of form T2057 and form TP-518-V are enclosed with this tax instruction letter and the form T2057 can also be obtained at <https://www.canada.ca/en/revenue-agency/services/forms-publications/forms/t2057.html> and the form TP-518-V can also be obtained at <https://www.revenuquebec.ca/en/online-services/forms-and-publications/current-details/tp-518-v/>. Federal tax election form T2058 and, if applicable, Québec tax election form TP-529-V should be completed by Eligible Holders who are partnerships; copies of form T2058 and form TP-529-V are enclosed with this tax instruction letter, and the form T2058 can also be obtained at <https://www.canada.ca/en/revenue-agency/services/forms-publications/forms/t2058.html> and the form TP-529-V can also be obtained at <https://www.revenuquebec.ca/en/online-services/forms-and-publications/current-details/tp-529-v/>.

### **Summary of what an Eligible Holder needs to do to file a Section 85 Election**

1. Submit your completed Section 85 Election Form(s) to IAMGOLD in accordance with the procedures set out in this tax instruction letter so that it is received on or before the Tax Election Deadline. Your completed Section 85 Election should be submitted by e-mail at the e-mail address noted below. For help in identifying the required Section 85 Election information, please refer to the following pages of this tax instruction letter. It is your responsibility to ensure the information provided in the Section 85 Election is in compliance with the requirements imposed under the Tax Act (or the Québec Act, if applicable) to make a valid joint election.
2. Subject to your Section 85 Election Form(s) being complete and in compliance with requirements imposed under the Tax Act (or the Québec Act, if applicable), IAMGOLD will send one signed electronic copy of the Section 85 Election Form(s) to you by email within 30 days after receiving the completed Section 85 Election Form. If you do not receive a signed copy of your Section 85 Election Form, it is your responsibility to contact the email noted below.
3. If you and your tax advisors are satisfied that each Section 85 Election Form is accurate and complete, sign and date both copies of the Section 85 Election Form in the area marked “Signature of transferor, authorized officer, or authorized person” at the bottom of page 3 of the federal tax election form T2057 or “Signature of authorized officer of the partnership” at the top of page 4 of the federal tax election form T2058 and, if applicable, in the area marked “Signature of transferor or authorized signee” at the bottom of page 4 of the Québec tax election form TP-518-V or “Signature of authorized signee for the transferor” at the bottom of page 4 of the Québec tax election form TP-529-V.
4. File one copy of the signed Section 85 Election Form(s) with the tax authorities immediately. Page 5 of this tax instruction letter provides details on where to file your Section 85 Election Form(s). Retain one copy of the Section 85 Election Form(s) for your records.
5. Report the disposition of your Company Shares on your income tax return for your taxation year in which the disposition took place. The proceeds of disposition should be equal to the “agreed amount” indicated in the Section 85 Election Form and, if applicable, the Québec tax election form. For future reference, the ACB (i.e., tax cost) of the Purchaser Shares acquired on the exchange should generally be equal to this “agreed amount”, minus the cash portion of the Consideration, subject to certain provisions in the Tax Act.

If you require further assistance, please email [nsup.iamgold.taxelection@nortonrosefulbright.com](mailto:nsup.iamgold.taxelection@nortonrosefulbright.com) for questions regarding the tax election process.

We recommend you consult with your tax advisors for specific tax advice in respect of the Section 85 Election and related tax matters.

### **How to Submit the Section 85 Election to IAMGOLD**

Each Eligible Holder that wishes to make a Section 85 Election must submit their Section 85 Election Form by emailing a copy of the completed Section 85 Election to [nsup.iamgold.taxelection@nortonrosefulbright.com](mailto:nsup.iamgold.taxelection@nortonrosefulbright.com).

IAMGOLD must receive a copy of the Section 85 Election Form on or before the Tax Election Deadline. IAMGOLD will not verify the accuracy of any information provided by or on behalf of any Eligible Holder. Unless a Section 85 Election Form is sent by an Eligible Holder in accordance with the procedures set out in this tax instruction letter, IAMGOLD will have no obligation to make a Section 85 Election with such Eligible Holder.

### **Deadline for Submitting Section 85 Election Information to IAMGOLD**

The Section 85 Election process is time-sensitive. IAMGOLD has agreed to make a Section 85 Election with an Eligible Holder from whom a correct and complete Section 85 Election Form is received by IAMGOLD by the Tax Election Deadline. The Tax Election Deadline is 120 days after the Effective Date.

**If the Section 85 Election for an Eligible Holder is not received by IAMGOLD by the Tax Election Deadline and in accordance with the procedures set out in this tax instruction letter, IAMGOLD will have no obligation to make a Section 85 Election with such Eligible Holder and therefore such Eligible Holder may not benefit from a full or partial tax deferral pursuant to the provisions of section 85 of the Tax Act and, if applicable, the equivalent provisions of the Québec Act.**

**In its sole discretion, IAMGOLD or any successor corporation may choose to make a Section 85 Election with an Eligible Holder from whom it receives a Section 85 Election Form after the Tax Election Deadline, but will have no obligation to do so.**

### **Execution and Delivery of a Section 85 Election Form by IAMGOLD**

In order to make a valid Section 85 Election, the applicable Section 85 Election Form(s) must be signed and properly completed with the necessary information, including the number of Company Shares exchanged and the number of Purchaser Shares received by the Eligible Holder, and the applicable “agreed amount” for the purposes of such tax election. IAMGOLD will only sign a Section 85 Election Form that is completed, reflects information as set out in the Arrangement, and has been submitted by an Eligible Holder within the time and manner specified herein. IAMGOLD has no responsibility to verify the information provided. IAMGOLD will not execute a Section 85 Election Form that does not comply with the provisions of the Tax Act (or any applicable provincial income tax law).

IAMGOLD will forward one copy of the executed Section 85 Election Form(s) by email to the Eligible Holder to the email address provided within 30 days after receiving the completed Section 85 Election Form.

**None of Northern Superior, IAMGOLD, the Depositary, nor any successor corporation will be responsible for the proper completion of any Section 85 Election Form nor, except for IAMGOLD’s obligation to sign and deliver a Section 85 Election Form completed by the Eligible Holder on or before the Tax Election Deadline, for any taxes, interest or penalties arising as a result of the failure of an Eligible Holder to complete and file such Section 85**

**Election form properly or timely in the form and manner prescribed by the Tax Act (and the Québec Act, if applicable).**

### **Filing a Section 85 Election with the Tax Authorities**

Generally, in order for a Section 85 Election to be accepted by the Canada Revenue Agency (the “CRA”) (and Revenu Québec, if applicable) without an Eligible Holder being liable for a late-filing penalty, the completed Section 85 Election Form must be filed with the CRA (and Revenu Québec, if applicable) on or before the date that is the earliest of the day by which either IAMGOLD or the Eligible Holder is required to file an income tax return for the taxation year in which the Arrangement occurred (the “**Filing Deadline**”). IAMGOLD’s 2025 taxation year is scheduled to end on December 31, 2025, but it may end earlier in certain circumstances. IAMGOLD is required to file an income tax return for a particular taxation year six months after such taxation year-end. Eligible Holders that wish to make the Section 85 Election are urged to file such election with the CRA (and Revenu Québec, if applicable) as soon as possible. Furthermore, each Eligible Holder is urged to consult the Eligible Holder’s own tax advisors as soon as possible respecting the Section 85 Election and the Eligible Holder’s applicable Filing Deadline.

However, regardless of the Eligible Holder’s Filing Deadline, the complete and accurate Section 85 Election Form must be received by IAMGOLD by the Tax Election Deadline and in accordance with the procedures set out in this tax instruction letter.

The federal tax election form should be filed with the applicable CRA Tax Centre. Information on Tax Centres can be found on the CRA website: <https://www.canada.ca/en/revenue-agency/corporate/contact-information/tax-centres.html>

The Québec tax election form, together with a copy of the federal tax election form, should be filed with Revenu Québec at either of the following addresses:

Revenu Québec  
C.P. 3000, succursale Place-Desjardins  
Montréal (Québec) H5B 1A4

Revenu Québec  
3800, rue de Marly  
C.P. 25555, succursale Terminus  
Québec (Québec) G1A 1B9

Eligible Holders filing in Québec should note that corporations established in Québec are required to file the French version of the Québec Section 85 Election Form with Revenu Québec; however, the federal Section 85 Election Form accompanying the Québec Section 85 Election Form can be the English version.

**None of Northern Superior, IAMGOLD, the Depositary, nor any successor corporation will be responsible for the filing of any Section 85 Election Form by the Eligible Holder’s Filing Deadline.**

**None of Northern Superior, IAMGOLD, the Depositary, nor any successor corporation will be responsible or liable for taxes, interest, penalties, damages or expenses resulting from the failure by an Eligible Holder to properly file a complete and accurate Section 85 Election**

**Form (and Québec tax election form, if applicable) within the time prescribed under the Tax Act (and the Québec Act, if applicable). Eligible Holders will be solely responsible for the payment of any interest, taxes, and/or late-filing penalties.**

**Eligible Holders should consult with their own legal and/or tax advisors for specific advice in respect of their applicable Filing Deadline.**

## **Frequently Asked Questions**

### ***Q1. How do I confirm the number of Purchaser Shares I received pursuant to the Arrangement?***

A1. If you held your Company Shares through a securities broker immediately prior to the Arrangement, your securities broker may be able to provide you with this information. Alternatively, this information should be on your brokerage statement for the period that includes the Effective Date of the Arrangement.

### ***Q2. What happens if I was entitled to a fraction of a Purchaser Share?***

A2. No fractional Purchaser Shares were issued to any Eligible Holder. Pursuant to Section 3.4 of the Arrangement, where the aggregate number of Purchaser Shares to be issued to an Eligible Holder as part of the Consideration would result in a fraction of a Purchaser Share being issuable, the number of Purchaser Shares to be issued to such Eligible Holder shall be rounded down to the closest whole number without any additional compensation or cost.

### ***Q3. How do I determine how many Company Shares were disposed of pursuant to the Arrangement?***

A3. If you held your Company Shares through a securities broker, your securities broker may be able to confirm the number of Company Shares you disposed of. Alternatively, this information should be on your brokerage statement for the period that includes the Effective Date of the Arrangement.

### ***Q4. Will IAMGOLD help me complete the Section 85 Election Form?***

A4. No. The Eligible Holder must prepare each applicable Section 85 Election Form and share a completed copy of such Section 85 Election Form with IAMGOLD. IAMGOLD or its representative will provide a signed copy of the Section 85 Election Form to the Eligible Holder. Neither IAMGOLD nor its representative will provide legal or tax advice to any Eligible Holder in connection with their Section 85 Election.

It is each Eligible Holder's responsibility to prepare the Section 85 Election Form accurately, sign it and file it with the CRA (and Revenu Québec, if applicable). IAMGOLD will not verify the accuracy of the information contained in the Section 85 Election Form.

### ***Q5. Is there a fee for making the Section 85 Election?***

A5. No, you are not required to pay any fees to IAMGOLD to make the Section 85 Election. The CRA (and Revenu Québec, if applicable) may levy a penalty for a late-filed Section 85 Election.

### ***Q6. How do I calculate the adjusted cost base ("ACB") of my Company Shares?***

A6. The ACB of an Eligible Holder's Company Shares that are capital property will generally be the amount that the Eligible Holder paid for the Company Shares when they were originally acquired plus reasonable costs to acquire the shares such as a broker commission. The cost of particular Company Shares may be different due to certain events (e.g., where a shareholder received their Company Shares in a tax-deferred transaction or by way of a gift). If the Eligible Holder received the Company Shares as a distribution from Northern Superior, the cost of those



shares would generally be their fair market value at the time of the distribution. The ACB of an Eligible Holder's Company Shares acquired at any time will generally be determined by averaging the cost of such shares with the ACB of other Company Shares held by the Eligible Holder as capital property immediately before that time, subject to certain exceptions in the Tax Act (and the Québec Act, if applicable).

The rules for determining ACB are complex. You should consult your own tax advisors to obtain assistance.

***Q7. I received my Company Shares from my spouse or common law partner through an inheritance or gift. What is my ACB?***

A7. The rules in this area are complex, and you should consult your tax advisors for information pertaining to your situation.

***Q8. What happens if IAMGOLD does not receive my Section 85 Election form by the Tax Election Deadline?***

A8. IAMGOLD has agreed to make a Section 85 Election with Eligible Holders only if a completed Section 85 Election Form is provided on or before the Tax Election Deadline, so it is important to provide a complete Section 85 Election Form by that deadline. IAMGOLD may, but is not obligated to, make a Section 85 Election if the Section 85 Election Form is received after the Tax Election Deadline. Consequently, you should ensure that your completed Section 85 Election Form is received by IAMGOLD in accordance with the procedures set out above by the Tax Election Deadline. Accordingly, if you wish to make a Section 85 Election with IAMGOLD you should give your immediate attention to this matter.

***Q9. I filed the Section 85 Election Form to obtain a full tax-deferred rollover on the disposition of my Company Shares. Do I have to report the disposition on my tax return for the period that includes the disposition of the Company Shares?***

A9. Yes. You must report the disposition of your Company Shares even though you elected to obtain a full deferral of any capital gain that might have otherwise arose on the disposition of your Company Shares pursuant to the Arrangement. You should consult your own tax advisors to obtain assistance in properly preparing your tax return.

***Q10. I have completed and submitted the Section 85 Election Form to IAMGOLD. What do I do next?***

A10. After receiving a completed Section 85 Election Form, IAMGOLD will execute such Section 85 Election Form and send a copy to you using the email address provided.

Once IAMGOLD returns the executed Section 85 Election Form, you must file such Section 85 Election Form with the CRA (or Revenu Québec, if applicable).

***Q11. If I make a Section 85 Election in Québec, am I required to make a federal Section 85 Election?***

A11. Yes, an Eligible Holder making a Section 85 Election in Québec must also make a federal Section 85 Election. Note that a copy of the federal Section 85 Election Form must be submitted to Revenu Québec when filing the Québec Section 85 Election Form. An Eligible Holder that is a

corporation established in Québec is required to file the French version of the Québec Section 85 Election Form, however the federal Section 85 Election Form accompanying the Québec Section 85 Election Form can be the English version.

**Schedule A**  
**Federal Tax Election Form T2057**

*See attached.*

**Election on Disposition of Property by a Taxpayer to a Taxable Canadian Corporation**

- This form is used by a taxpayer and a taxable Canadian corporation to jointly elect under subsection 85(1) where the taxpayer has disposed of eligible property under subsection 85(1.1) to the corporation and the taxpayer receives as consideration shares of capital stock of the corporation.
- In order to file this election, you **must** have a valid Canada Revenue Agency (CRA) account number. For information on how to obtain one, visit **canada.ca**.
- Unless otherwise indicated, all legislative references are to the Income Tax Act.
- To file this form electronically, please go to **canada.ca/cra-special-elections-and-returns**.  
**Or** mail one copy of the election and related documents (if any), completed by the transferor as follows:
  - to the tax centre of the transferor
  - on or before the earliest date on which any party to the election has to file an income tax return for the tax year in which the transaction occurred (due date). This due date must consider any election under subsection 25(1) or 99(2), and
  - separately from any other return
- When many transferors elect to transfer the same property (co-ownership) or many members of the same partnership elect to transfer their partnership interests, the elections will be processed together and should be filed:
  - to the tax centre of the transferee
  - on or before the due date, and
  - by a designated transferor to file all of the completed forms for each transferor, together with a list of all of the electing transferors. This list must contain the name, address and social insurance, business, or trust account number of each transferor
- Find the address of the transferor and transferee's tax centre at **canada.ca/tax-centres**.

Do not use this area.

Amended election **010** ☐ Yes**Part 1 – Identification**

If the transferor is an <b>individual</b> , is the transferor or their spouse self-employed for the year of the election? . . . . . <b>025</b> <input type="checkbox"/> Yes					
Is the transferor a non-resident of Canada? . . . . . <b>004</b> <input type="checkbox"/> Yes <input type="checkbox"/> No					
If <b>yes</b> , enter their taxpayer identification number (TIN) . . . . . <b>020</b>					
<b>002</b> Taxpayer's name (transferor)				<b>001</b> Social insurance, business, or trust account number	
Address				City	
Province, territory, or state		Postal or ZIP code		Country	
Tax year of the taxpayer		<b>011</b> Start: Year Month Day		<b>012</b> End: Year Month Day	
<b>019</b> Name of contact person		<b>024</b> Name of firm		<b>022</b> Telephone number <b>023</b> Extension	
Co-owner legal name <b>013</b>				Social insurance, business, or trust account number <b>014</b>	
1.					
2.					
3.					
4.					
<b>015</b> Corporation's name (transferee)				<b>016</b> Business number	
Address		City		Province or territory Postal code	
Tax year of the corporation		<b>017</b> Start: Year Month Day		<b>018</b> End: Year Month Day	

**Part 2 – Penalty for late-filed and amended elections**

An election that is filed after its due date will be subject to a late-filing penalty. Form T2057 can be filed within three years after its due date if an estimate of the penalty is paid at the time of filing. Form T2057 can also be amended or filed after the three-year period at the minister's discretion, but a written explanation of the reason the election is amended or late-filed must be attached for consideration by the minister and an estimate of the applicable penalty must be paid at the time of filing.

**Calculation of late-filing penalty:**

Total fair market values of the disposed properties from Schedule A ..... \_\_\_\_\_

Total agreed amounts of the disposed properties from Schedule A ..... \_\_\_\_\_

Subtotal (total fair market values **minus** total agreed amounts) ..... **2A**

Amount 2A .....  $\times \frac{1}{4} \times 1\% \times$  Number of months \* ..... **2B**

\$100  $\times$  Number of months \* ..... **2C**

**Amount 2C cannot exceed \$8,000**

Late-filing penalty (amount 2B or amount 2C, whichever is less) ..... **320**

Amount enclosed **400**

If paying by cheque or money order, make payable to the Receiver General. Write "T2057", the name of the taxpayer (transferor), their social insurance, business, or trust account number and tax year-end on the back of your cheque or money order. \*\*

\* Number of months is the sum of each month or each part of a month in the period from the filing due date to the actual date filed.

\*\* Daily compound interest at the prescribed rate applies to unpaid amounts, including late-filing penalties.

**Part 3 – Information required**

On the attached Schedule A, list, describe, and state the fair market value (FMV) of the transferred properties. The description and FMV of the consideration received must be shown opposite of the related property transferred. In the case of depreciable property, the Minister can determine the order in which such properties are disposed of unless you have designated the order of disposition of each depreciable property before the filing due date for this election. It may be necessary for you to prepare the following material to complete the form: the calculation of the adjusted cost base of all transferred properties, a summary of the method of evaluating the FMV of each property transferred; schedules supporting this election; a designation concerning the order of disposition of depreciable property; and documentation relating to the responses to the questions below. If there is not enough space on the form, complete extra schedules giving similar details. This material does not need to be filed with the election, but, must be kept in case we ask to see it at a later date.

1. Is there a written agreement relating to this transfer? ..... **200** ☐ Yes ☐ No ☐ N/A
2. Is there a valuation report for the transferred assets? ..... **201** ☐ Yes ☐ No ☐ N/A  
(A valuation report is an independent assessment of the FMV of the transferred property)
3. Does a price adjustment clause apply to any of the properties? (See Income Tax Folio S4-F3-C1 for details) ... **202** ☐ Yes ☐ No ☐ N/A
4. Do any persons other than the taxpayer own or control directly or indirectly any shares of any class of the transferee? ..... **203** ☐ Yes ☐ No ☐ N/A
5. Does a non-arm's length transfer exist between two or more corporations? ..... **204** ☐ Yes ☐ No ☐ N/A  
If **yes** to question 5, have all or substantially all (90% or more) of the properties of the corporation(s) been transferred to the transferee corporation? ..... **205** ☐ Yes ☐ No ☐ N/A
6. Where shares of a corporation are being transferred, does the transferee own more than 10% of the capital stock of the corporation after the transfer? ..... **206** ☐ Yes ☐ No ☐ N/A
7. If the transferor is a non-resident of Canada, are any of the properties transferred taxable Canadian properties? ..... **207** ☐ Yes ☐ No ☐ N/A

Where shares of the capital stock of a private corporation are included in the property disposed of, provide the following:

	Corporation's name <b>216</b>	Business number <b>217</b>	Total paid-up capital (under the Income Tax Act) <b>218</b>
1.		R   C	
2.		R   C	
3.		R   C	
4.		R   C	
5.		R   C	

**Notes**

- The rules for section 85 elections are complex. Essential information is contained in Information Circular IC76-19, Interpretation Bulletins IT-291 and IT-378, and Income Tax Folio S4-F3-C1.
- Complete all the information areas and answer all questions. If this form is incomplete, we may consider the election invalid and a late-filing penalty may be applied to future submissions.
- Taxable Canadian property is defined under subsection 248(1).

**Part 4 – Description of shares received**

	Number of shares transferor received <b>250</b>	Class of shares: Common <b>251</b>	Class of shares other than Common <b>252</b>	Redemption value per share <b>253</b>	Total paid-up capital (under the Income Tax Act) <b>254</b>	Voting <b>255</b>	Non-Voting <b>256</b>	Are the shares redeemable at the holder's option? <b>257</b>
1.		<input type="checkbox"/> Yes				<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.		<input type="checkbox"/> Yes				<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.		<input type="checkbox"/> Yes				<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.		<input type="checkbox"/> Yes				<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.		<input type="checkbox"/> Yes				<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No

**Part 5 – Election and certification**

The taxpayer **and** the corporation jointly elect under subsection 85(1) in respect of the property specified and certify that the information given in this election and in any attached document is correct and complete.

**Transferor**

**960** \_\_\_\_\_ **961** \_\_\_\_\_  
 Print name of transferor, authorized officer, or authorized person Position or title

**962** \_\_\_\_\_ **963** Date \_\_\_\_\_  
 Signature of transferor, authorized officer, or authorized person Year Month Day

**Transferee**

**970** \_\_\_\_\_ **971** \_\_\_\_\_  
 Print name of authorized officer or authorized person of transferee Position or title

**972** \_\_\_\_\_ **973** Date \_\_\_\_\_  
 Signature of authorized officer or authorized person of transferee Year Month Day

**Privacy notice**

Personal information (including the SIN) is collected and used to administer or enforce the Income Tax Act and related programs and activities including administering tax, benefits, audit, compliance, and collection. The information collected may be disclosed to other federal, provincial, territorial, aboriginal, or foreign government institutions to the extent authorized by law. Failure to provide this information may result in paying interest or penalties, or in other actions. Under the Privacy Act, individuals have a right of protection, access to and correction of their personal information, and to file a complaint with the Privacy Commissioner of Canada regarding the handling of their personal information. Refer to Personal Information Bank CRA PPU 005, PPU 015, and PPU 047 on Info Source at [canada.ca/cra-info-source](http://canada.ca/cra-info-source).

## Schedule A

## Information on the property disposed of and consideration received

Date of sale or transfer of all properties listed on Schedule A

500

Year Month Day

For properties sold or transferred on different dates, use a separate Form T2057.

## Capital property (other than shares and depreciable property)

	Brief legal description of the disposed property	Elected amount limits <sup>1</sup> FMV of the disposed property	Elected amount limits <sup>1</sup> Cost amount <sup>2</sup>	Agreed amount (cannot be "0")	Amount to be reported (line 513 minus line 512) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 516 plus line 518)
	510	511	512	513	514	515	516	517	518	519
1.										
2.										
3.										

## Capital property (shares only)

	Number and class of shares	Elected amount limits <sup>1</sup> FMV of the disposed property	Elected amount limits <sup>1</sup> Cost amount <sup>2</sup>	Agreed amount (cannot be "0")	Amount to be reported (line 523 minus line 522) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 526 plus line 528)
	520	521	522	523	524	525	526	527	528	529
1.										
2.										
3.										

## Depreciable property

	Description and prescribed class of the disposed property	Elected amount limits <sup>1</sup> FMV of the disposed property	Elected amount limits <sup>1</sup> Amount <sup>3</sup>	Agreed amount (cannot be "0")	Amount to be reported (line 533 minus line 532) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 536 plus line 538)
	530	531	532	533	534	535	536	537	538	539
1.										
2.										
3.										

## Information on the property disposed of and consideration received (continued)

Inventory excluding real property										
	Description (kind of disposed property)	Elected amount limits <sup>1</sup>  FMV of the disposed property	Elected amount limits <sup>1</sup>  Cost amount	Agreed amount (cannot be "0")	Amount to be reported (line 543 <b>minus</b> line 542) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 546 <b>plus</b> line 548)
	540	541	542	543	544	545	546	547	548	549
1.										
2.										
3.										
Resource property										
	Brief legal description of disposed property	Elected amount limits <sup>1</sup>  FMV of the disposed property	Elected amount limits	Agreed amount (cannot be "0")	Amount to be reported (line 553 <b>minus</b> line 552) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 556 <b>plus</b> line 558)
	550	551	552	553	554	555	556	557	558	559
1.			nil							
2.			nil							
3.			nil							
Security or debt obligation property										
	Description of disposed property	Elected amount limits <sup>1</sup>  FMV of the disposed property	Elected amount limits <sup>1</sup>  Cost amount	Agreed amount (cannot be "0")	Amount to be reported (line 563 <b>minus</b> line 562) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 566 <b>plus</b> line 568)
	560	561	562	563	564	565	566	567	568	569
1.										
2.										
3.										



## Information on the property disposed of and consideration received (continued)

## Specified debt obligation (for financial institutions only)

	Description	Elected amount limits <sup>1</sup>  FMV of the disposed property	Elected amount limits <sup>1</sup>  Cost amount	Agreed amount (cannot be "0")	Amount to be reported (line 573 <b>minus</b> line 572) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 576 <b>plus</b> line 578)
	570	571	572	573	574	575	576	577	578	579
1.										
2.										
3.										

## Capital property (real property owned by a non-resident person)

	Description	Elected amount limits <sup>1</sup>  FMV of the disposed property	Elected amount limits <sup>1</sup>  Cost amount	Agreed amount (cannot be "0")	Amount to be reported (line 583 <b>minus</b> line 582) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 586 <b>plus</b> line 588)
	580	581	582	583	584	585	586	587	588	589
1.										
2.										
3.										

AgrilInvest fund no. 2 <sup>5</sup>

	Description	Elected amount limits <sup>1</sup>  FMV of the disposed property	Elected amount limits <sup>1</sup>  Cost amount	Agreed amount (cannot be "0")	Amount to be reported (line 593 <b>minus</b> line 592) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 596 <b>plus</b> line 598)
	590	591	592	593	594	595	596	597	598	599
1.										
2.										
3.										

## Totals

--	--	--	--	--	--	--	--	--	--	--

## Endnotes

<sup>1</sup> For more information on limits, read Interpretation Bulletin IT-291, Transfer of Property to a Corporation Under Subsection 85(1).

<sup>2</sup> Adjusted cost base (subject to adjustment under section 53).

<sup>3</sup> The lesser of the undepreciated capital cost of all property of the class and the cost of the property.

<sup>4</sup> If the amount is greater than 0, it must be reported either as a capital gain or as income, whichever applies. Also, in the case of depreciable property, a portion of the amount may have to be reported as a capital gain while another portion of the amount may have to be reported as income.

<sup>5</sup> Contributions made in a tax year ending after 2007, and amounts earned on those contributions, are only eligible if that property is owned by an individual.

**Schedule B**  
**Québec Tax Election Form TP-518-V**

*See attached.*

## Transfer of Property by a Taxpayer to a Taxable Canadian Corporation

This form is to be used by any taxpayer (the transferor) and any taxable Canadian corporation (the transferee) to which the taxpayer has transferred property for consideration that includes a share of the transferee's capital stock. An election for the transfer pursuant to subsection 85(1) of the *Income Tax Act* (ITA) must have been made with the Canada Revenue Agency (CRA) by means of form T2057, *Election on Disposition of Property by a Taxpayer to a Taxable Canadian Corporation*. Note that, if the conditions listed in Table 2 (see page 5) are met, a transferor and transferee (the parties) can **agree on an amount that is different** from the one in form T2057.

This form must also be completed in order to make:

- a **rollover application for Québec income tax purposes** if, by reason of subsection 13(21.2) of the ITA, the election under subsection 85(1) of the ITA cannot be made; or
- an **application to the Minister** to amend a previous TP-518-V form, where:
  - the parties had agreed on an amount that was the same as the one in form T2057 but wish to agree on a different amount;

- the parties had agreed on an amount that was different from the one in form T2057 and wish to cancel or change the amount; or
- the parties wish to change the amount they agreed on as part of a rollover application for Québec income tax purposes only.

The conditions in Table 2 (see page 5) must be met in order for either application mentioned above to be made.

### Important

File this form and the required documents (see page 5) **separately from any income tax return**. If multiple transferors elect to transfer a single property held in co-ownership, or if multiple members of the same partnership elect to transfer their interest in the partnership, each transferor must complete a separate copy of this form. A person appointed by the transferors must then send us all the forms for each transferor **together**.

## 1 Identification

### 1.1 Transferor

Social insurance number		Identification number		File	Québec enterprise number (NEQ)	
01a		01b		0001	01c	
Name or business name of transferor						
02						
Apartment number		Street number		Street name or PO box		
03		03a		03b		
City, town or municipality					Province	Postal code
03c					03d	03e
Taxation year of the transfer						
Start date of taxation year		End date of taxation year		Trust account number <sup>1</sup>		
04		05		06		
Y Y Y Y M M D D		Y Y Y Y M M D D				

### 1.2 Transferee

Identification number		File	Québec enterprise number (NEQ)	
10a		IC 0001	10b	
Name of corporation				
11				
Street number		Street name		Suite
12		12a		12b
City, town or municipality				Province
12c				Postal code
12d				12e
Taxation year of the transfer				
Start date of taxation year		End date of taxation year		
13		14		
Y Y Y Y M M D D		Y Y Y Y M M D D		

### 1.3 Contact person

Name of contact person		Area code	Phone
20		20a	



14VL ZZ 49528676

Prescribed form

## 2 Details concerning certain applications

Complete this part if the conditions in Table 2 (page 5) are met and the parties are making one of the following applications:

- an application to agree on an amount that is different from the amount in form T2057 (complete section 2.1);
- a rollover application for Québec income tax purposes only if, by reason of subsection 13(21.2) of the ITA, the election under subsection 85(1) of the ITA cannot be made (complete section 2.2); or
- an application to the Minister to amend a previous TP-518-V form, if:
  - the parties had agreed on an amount that was the **same** as the one in form T2057 but wish to agree on a different amount (complete section 2.1); or
  - the parties had agreed on an amount that was **different** from the one in form T2057 and wish to change the amount (complete section 2.1).

You do not have to complete Part 2 for other types of applications to the Minister, but the conditions in Table 2 (see page 5) must be met.

### 2.1 Application to agree on a different amount

If, for a transferred property, the agreed amount in column E of the table in section 3.1 is different from the amount in form T2057, is the difference **entirely (or almost entirely)** attributable to the difference between the cost of the property (for purposes of Québec legislation) in column C of the table and the cost of the property (for purposes of federal legislation) in form T2057?

30 ☐ Yes ☐ No

If you answered **No**, explain the difference:

30a

We must deem the reason to be acceptable in the circumstances.

### 2.2 Rollover application

If, by application of subsection 13(21.2) of the ITA, the election under subsection 85(1) of the ITA cannot be made, and the parties wish to make a rollover application for Québec income tax purposes only, provide the following information:

- Are the parties dealing at non-arm's-length? ..... 40 ☐ Yes ☐ No
- Has all or substantially all (90% or more) of the transferor's property been transferred to the transferee? ..... 41 ☐ Yes ☐ No
- Is there a written agreement related to the transfer? ..... 42 ☐ Yes ☐ No
- Does a price adjustment claim apply to any of the transferred property? ..... 43 ☐ Yes ☐ No
- Complete the table below with the number and undepreciated capital cost (UCC) of each class of property the transferred property belongs to.

	A Class number	B UCC before transfer
44		
45		
46		
47		
48		

## 3 Particulars of the transferred property and the consideration received

If shares of the capital stock of a private corporation are included in the transfer, provide the following information:

Name of the private corporation

50

Identification number

File

Québec enterprise number (NEQ)

Paid-up capital of transferred shares

51a 0001

51b

52



14LO ZZ 49527679

3 Particulars of the transferred property and the consideration received (continued)

If multiple transfers of depreciable property were carried out at the same time, they must be entered in the order chosen by the transferor.

Unless otherwise indicated, it is not necessary to provide documents to support the elected order of transfer, the information provided in this section or the method used to evaluate each transferred property. However, you must keep any relevant documents for audit purposes.

Enter the fair market value (FMV) of the property and the FMV of the consideration received as calculated on the date of transfer. If you need more space, attach a separate sheet showing the same information.

3.1 Transferred property and agreed amount

Date of transfer of the property below:

54

Y Y Y Y M M D D

► Use a separate copy of this part for any property that was transferred on a different date.

	A Description of property	Limits respecting the agreed amount			E Agreed amount <sup>3</sup>	F Col. E – Col. C <sup>4</sup> (if the result is negative, enter 0)
		B FMV of property	C Cost of property <sup>2</sup>	D FMV of the consideration received (other than shares)		
55						
Capital property other than depreciable property (short description)						
1		.	.	.	.	.
2		.	.	.	.	.
3		.	.	.	.	.
4		.	.	.	.	.
Depreciable property (short description and prescribed class)						
5		.	.	.	.	.
6		.	.	.	.	.
7		.	.	.	.	.
8		.	.	.	.	.
9		.	.	.	.	.
10		.	.	.	.	.
11		.	.	.	.	.
Inventory (type)						
12		.	.	.	.	.
13		.	.	.	.	.
14		.	.	.	.	.
Mining property (short description)						
15		.	N/A	.	.	.
16		.	N/A	.	.	.
Securities and debt obligations (short description)						
17		.	.	.	.	.
18		.	.	.	.	.
Other <sup>5</sup> (short description)						
19		.	.	.	.	.
20		.	.	.	.	.



### 3.2 Consideration received

	A Line of the table in section 3.1 associated with the property	Consideration other than shares		Shares		E Total FMV of the consideration received (Col. D of the table in section 3.1 + FMV of shares)
		B Short description	C Number	D Class		
56a						
56b						
56c						
56d						
56e						

  

	F Cash surrender value per share (\$)	G Tax value of paid-up capital per share (\$)	H Are the shares voting shares?		I Are the shares retractable?	
			Yes	No	Yes	No
56a			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
56b			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
56c			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
56d			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
56e			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 4 Penalty (for late filing of the form or an application to the Minister)

If this transfer results in more than one penalty, only the highest penalty must be paid.

FMV of the transferred property		60	
Agreed amount for the property	—	61	
Subtract line 61 from line 60.	=	62	
	×	63	0.25%
Multiply line 62 by 0.25%.	=	64	
Number of months <sup>6</sup>	×	65	
Multiply line 64 by the number entered on line 65.	=	66	
Number of months entered on line 65 multiplied by \$100		67	
Enter the amount on line 66, the amount on line 67 or \$5,000, whichever is the <b>least</b> .	<b>Penalty</b>	68	

### 5 Certification

We, the parties shown in Part 1, are filing this form for one of the following reasons:

- ☐ 70 We have made an election under subsection 85(1) of the ITA for the property described in Part 3.
- ☐ 71 We are filing an application to the Minister under the third paragraph of section 522 of the *Taxation Act* for the property described in Part 3.
- ☐ 72 We are submitting a rollover application for Québec income tax purposes because no election can be made under subsection 85(1) of the ITA by reason of subsection 13(21.2) of the ITA.

We certify that the information given in this form and in any enclosed documents is accurate and complete.

Name of transferor or authorized signee<sup>7</sup> (please print)

Name of authorized signee for the transferee<sup>7</sup> (please print)

Signature of transferor or authorized signee

Signature of authorized signee for the transferee

Date

**Do not use this space.**

Date de réception	Autorisation	Montant faisant l'objet d'une pénalité	Pénalité	Versement	Total



14LQ ZZ 49527681

## Information

Table 1 lists the documents to enclose with this form, as well as the filing deadline, by application type. It also indicates whether the conditions in Table 2 below must be met and if the parties must complete Part 2 above.

**Table 1 – General information**

Application type	Conditions in Table 2	Complete Part 2	Documents to enclose	Filing deadline
<b>Original application</b> <ul style="list-style-type: none"> <li>Application to agree on an amount that is the same as the one in form T2057</li> </ul>	No	No	A copy of form T2057 and any other document sent to the CRA	The <b>later</b> of the following dates: <ul style="list-style-type: none"> <li>The earliest of the filing deadlines for the income tax returns in question<sup>8</sup></li> <li>The last day of the second month following the later of the dates on lines 05 and 14 in Part 1</li> </ul> The parties must pay a late-filing penalty if they file this form and the required documents after the deadline.
<ul style="list-style-type: none"> <li>Application to agree on an amount that is different from the one in form T2057</li> </ul>	Yes	Yes (section 2.1)		
<ul style="list-style-type: none"> <li>Rollover application for Québec income tax purposes</li> </ul>	Yes	Yes (section 2.2)		
<b>Application to the Minister to amend a previous TP-518-V form</b> <ul style="list-style-type: none"> <li>The parties had agreed on an amount that was <b>the same as</b> the one in form T2057 but wish to agree on a <b>different</b> amount</li> </ul>	Yes	Yes (section 2.1)	A copy of form T2057 and any other document sent to the CRA, if the previous T2057 form was amended	The application must be filed within three years of the filing deadline for the TP-518-V form the parties want to amend.  However, it can be filed later if we authorize the parties to do so.  The parties must pay a late-filing penalty if they file an application to the Minister after the filing deadline for the TP-518-V form the parties want to amend.
<ul style="list-style-type: none"> <li>The parties had agreed on an amount that was <b>different</b> from the one in form T2057 and wish to <b>change</b> it</li> </ul>	Yes	Yes (section 2.1)		
<ul style="list-style-type: none"> <li>The parties had agreed on an amount that was <b>different</b> from the one in form T2057 and wish to <b>cancel</b> it</li> </ul>	Yes	No		
<ul style="list-style-type: none"> <li>The parties wish to change the amount they agreed on as part of a rollover application for Québec income tax purposes</li> </ul>	Yes	No	The documents enclosed with the <b>original</b> rollover application for Québec income tax purposes	

**Table 2 – Conditions for certain applications**

Application type	Conditions	Note
Application to agree on an amount that is different from the one in form T2057	<ul style="list-style-type: none"> <li>If the transferor is an individual, they must have been resident in Québec on the date on line 05 in section 1.1.</li> <li>The transferor must have <b>carried on at least 90% of their business in Québec</b> in the taxation year on lines 04 and 05 in section 1.1 (the taxation year of the transfer).</li> <li>The transferee must have <b>carried on at least 90% of their business in Québec</b> in the taxation year on lines 13 and 14 in section 1.2 (the taxation year of the transfer).</li> </ul>	To determine the proportion of business carried on in Québec if the transferor is an individual, divide their income earned in Québec by their income earned in Québec and elsewhere as determined under the regulations.  If the transferor is a corporation, the proportion of its business carried on in Québec must be calculated in accordance with the regulations made under section 771 of the <i>Taxation Act</i> . The same is true for the proportion of business carried on in Québec by the transferee.
Rollover application for Québec income tax purposes		
Application to the Minister to amend a previous TP-518-V form (all situations)		





## Notes

1. This account number is shown on the federal *Trust Income Tax and Information Return* (form T3RET).
2. Enter the following in column C:
  - for **capital property other than depreciable property**, the adjusted cost base (it is subject to adjustments under sections 255 and 257 of the *Taxation Act*);
  - for **depreciable property**, the lesser of the following:
    - the capital cost of the property, or
    - the UCC of all the property in that class immediately before the transfer;
  - for **inventory, securities and debt obligations**, the cost amount.

If the transferred property is class 14.1 property acquired before January 1, 2017, contact us.
3. The agreed amount must generally be the same as the amount in form T2057. However, if the parties file a rollover application for Québec income tax purposes, an application to the Minister or another application for which you are completing Part 2, you can enter a different amount, calculated while taking into account the limits in columns B, C and D. The agreed amount must therefore be:
  - **equal to or greater than:**
    - the lesser of the amounts in columns B and C, except for mining property, and
    - the amount in column D; **and**
  - **less than or equal to** the amount in column B.

If the transferred property is depreciable property and, on the 30th day following the transfer, the transferor or a related person is its owner or has the right to acquire it (except for a right that exists only as a guarantee and arises from a hypothec, a sale contract or similar title), the agreed amount under the rules above must be equal to or less than the **lesser** of the following:

  - the capital cost of the property; or
  - the UCC of the applicable class **multiplied** by the ratio between the FMV of the property and the FMV of all the property in that class.
4. The transfer of the property by the transferor to the transferee constitutes a disposition of property, and the agreed amount (column E) represents both the proceeds of disposition for the transferor and the capital cost of the property for the transferee. Depending on the type of property, the transferor must report all amounts entered in column F as a capital gain or as income. For depreciable property, part of the amount can be reported as a capital gain and part as business or property income.
 

If you entered 0 in column F because the amount is negative, the amount may constitute a capital loss or, for depreciable property, a terminal loss.

For more on the tax treatment of the disposition of property, see guide IN-120-V, *Capital Gains and Losses*.
5. The property can be capital property that is an immovable held by a non-resident or a NISA fund No. 2.
6. Enter the number of months or fraction of a month from the filing deadline (see page 5) to the day the required documents were sent or, for an application to the Minister, the number of months or fraction of a month from the filing deadline for the TP-518-V form that the parties are amending to the date of the application to the Minister.
7. Attach a copy of the document authorizing the person to sign.
8. The income tax returns in question are:
  - if there is one transferor, the transferor's income tax return for the taxation year covered by lines 04 and 05 in section 1.1;
  - if there are multiple transferors, their income tax returns for the taxation year covered by lines 04 and 05 in section 1.1;
  - the transferee's income tax return for the taxation year covered by lines 13 and 14 in section 1.2.
9. If one of the electing members is a partnership, you must also enclose the information requested in section 1.1 for every member of the partnership.



**Schedule C**  
**Federal Tax Election Form T2058**

*See attached.*



## Election on Disposition of Property by a Partnership to a Taxable Canadian Corporation

- This form is used by a taxable Canadian corporation and all the members of a partnership, to jointly elect under subsection 85(2) where the partnership has disposed of property to the corporation and has received as consideration shares of any class of the capital stock of the corporation.
- In order to file this election you **must** have a valid Canada Revenue Agency (CRA) account number. If you do **not** have a RZ partnership account number, go to [canada.ca/business-registration-online](https://canada.ca/business-registration-online) or fill out Form RC1, Request for a business number and certain program accounts.
- Unless otherwise stated, all legislative references are to the Income Tax Act.
- To file electronically, go to [canada.ca/cra-special-elections-and-returns](https://canada.ca/cra-special-elections-and-returns).  
Or mail one copy of the election and related documents (if any), completed by the partner designated by the partnership, as follows:
  - to the tax centre serving the area of the transferee
  - on or before the earliest date on which any party to the election has to file an income tax return for the tax year in which the transaction occurred (due date)
  - separately from any other return
- To find the transferee's tax centre's address, go to [canada.ca/tax-centres](https://canada.ca/tax-centres).

Do not use this area

Amended election **010** ☐ Yes

### Part 1 – Identification

<b>002</b> Name of partnership (transferor)		<b>001</b> Partnership account number R Z	
Address	City	Postal or ZIP code	
Province, territory, or state	Country		
Tax year of partnership	<b>011</b> Start: Year Month Day	<b>012</b> End: Year Month Day	
If members of the partnership are individuals, are all of those individuals or their spouse self-employed for the year of the election? <b>025</b> <input type="checkbox"/> Yes			
<b>019</b> Name of contact person	<b>024</b> Name of firm	<b>022</b> Telephone number	<b>023</b> Extension
<b>015</b> Name of corporation (transferee)		<b>016</b> Business number R C	
Address	City	Postal or zip code	
Province, territory, or state	Country		
Tax year of corporation	<b>017</b> Start: Year Month Day	<b>018</b> End: Year Month Day	

**Part 2 – Penalty for late-filed and amended elections**

An election that is filed after its due date will be subject to a late-filing penalty. Form T2058 can be filed within three years after its due date if an estimate of the penalty is paid at the time of filing. Form T2058 can also be amended or filed after the three-year period at the minister's discretion, but a written explanation of the reason the election is amended or late-filed must be attached for consideration by the minister and an estimate of the applicable penalty must be paid at the time of filing.

**Calculation of late-filing penalty:**

Total fair market values of the disposed properties from Schedule A .....	_____	
Total agreed amounts of the disposed properties from Schedule A .....	_____	
Subtotal (total fair market values <b>minus</b> total agreed amounts)	_____	2A
Amount 2A _____ × ¼ × 1% × Number of months * . . . .	_____ = _____	2B
\$100 × Number of months * . . . .	_____ = _____	2C
<b>Amount 2C cannot exceed \$8,000</b>		

**Late-filing penalty** (amount 2B or amount 2C, whichever is less) ..... **320** \_\_\_\_\_

Amount enclosed **400** \_\_\_\_\_

If paying by cheque or money order, make payable to the Receiver General. Write "T2058", the name of the partnership (transferor), the partnership account number and the partnership's tax year-end on the back of your cheque or money order. \*\*

\* Number of months is the sum of each month or each part of a month in the period from the filing due date to the actual date filed.

\*\* Daily compound interest at the prescribed rate applies to unpaid amounts, including late-filing penalties.

**Part 3 – Information required**

On the attached Schedule A, list, describe, and state the fair market value (FMV) of the transferred properties. The description and FMV of the consideration received must be shown opposite of the related property transferred. In the case of depreciable property, the Minister can determine the order in which such properties are disposed of unless you have designated the order of disposition of each depreciable property before the filing due date for this election. It may be necessary for you to prepare the following material to complete the form: the calculation of the adjusted cost base of all transferred properties, a summary of the method of evaluating the FMV of each property transferred; schedules supporting this election; a designation concerning the order of disposition of depreciable property; and documentation relating to the responses to the questions below. If there is not enough space on the form, complete extra schedules giving similar details. This material does **not** need to be filed with the election, but, must be kept in case we ask to see it at a later date.

1. Is there a written agreement relating to this transfer? ..... **200** ☐ Yes ☐ No ☐ N/A
2. Is there a valuation report for the transferred properties? ..... **201** ☐ Yes ☐ No ☐ N/A  
(A valuation report is an independent assessment of the FMV of the transferred property)
3. Does a price adjustment clause apply to any of the properties? (See Income Tax Folio S4-F3-C1 for details) ... **202** ☐ Yes ☐ No ☐ N/A
4. Do any persons other than the members of the partnership own or control directly or indirectly any shares of any class of the transferee? ..... **203** ☐ Yes ☐ No ☐ N/A
5. Does a non-arm's length rollover exist between the partnership(s) and the transferee corporation? ..... **204** ☐ Yes ☐ No ☐ N/A  
If **yes** to question 5, have all or substantially all (90% or more) of the properties of the partnership been transferred to the corporation? ..... **205** ☐ Yes ☐ No ☐ N/A
6. Where shares of a corporation are being transferred, does the transferee own more than 10% of the capital stock of the corporation after the transfer? ..... **206** ☐ Yes ☐ No ☐ N/A
7. Are any partners non-residents of Canada? ..... **207** ☐ Yes ☐ No ☐ N/A  
If **yes**, are any of the properties transferred taxable Canadian properties? ..... **208** ☐ Yes ☐ No ☐ N/A

Where shares of the capital stock of a private corporation are included in the property disposed of, provide the following:

	Corporation's name <b>216</b>	Business number <b>217</b>	Total paid-up capital (under the Income Tax Act) <b>218</b>
1.		R   C	
2.		R   C	
3.		R   C	
4.		R   C	
5.		R   C	

**Notes**

- The rules for section 85 elections are complex. Essential information is contained in Information Circular IC76-19, Interpretation Bulletins IT-291 and IT-378 and Income Tax Folio S4-F3-C1.
- Complete all the information areas and answer all questions. If this form is incomplete, we may consider the election invalid and a late-filing penalty may be applied to future submissions.
- Taxable Canadian property is defined under subsection 248(1).

**Part 4 – Description of shares received**

	Number of shares transferor received <b>250</b>	Class of shares: Common <b>251</b>	Class of shares other than Common <b>252</b>	Redemption value per share <b>253</b>	Total paid-up capital (under the Income Tax Act) <b>254</b>	Voting <b>255</b>	Non-voting <b>256</b>	Are the shares redeemable at the holder's option? <b>257</b>
1.		<input type="checkbox"/> Yes				<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No
2.		<input type="checkbox"/> Yes				<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No
3.		<input type="checkbox"/> Yes				<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No
4.		<input type="checkbox"/> Yes				<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No
5.		<input type="checkbox"/> Yes				<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes <input type="checkbox"/> No

**Part 5 – Election and certification**

All members of the partnership (transferor) and the corporation (transferee) hereby jointly elect under subsection 85(2) in respect of the property specified and certify that the information given in this election and in any attached document is correct and complete.

**Section A – Transferor (partnership information)**

Provide information for **all** members of the partnership.

Is there an authorizing agreement ..... **300** ☐ Yes ☐ No

(An authorizing agreement enables one member to sign this election on behalf of all the other members of the partnership)

If **yes**, then you may submit the agreement with the election or make it available upon request.

**302** \_\_\_\_\_ **303** \_\_\_\_\_  
Print name of authorized officer of the partnership Position or title

**304** \_\_\_\_\_ **305** Date \_\_\_\_\_  
Signature of authorized officer of the partnership Year Month Day

List below all the members of the partnership. If there is no authorizing agreement, each member must sign and date on the applicable line with their details. If space is insufficient, attach another "Part 5 – Election and certification, Section A" as required to complete the list.

If a member of the partnership is itself a partnership, **attach a separate** list showing the name, social insurance, business, or trust account number of each member of that partnership.

	Social insurance, business, or trust account number <b>330</b>	Name (print) <b>335</b>	Taxation year-end (YYYYMMDD) <b>340</b>	Signature <b>345</b>	Date (YYYYMMDD) <b>350</b>
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					
9.					
10.					

**Section B – Transferee (corporation information)**

**960** \_\_\_\_\_ **961** \_\_\_\_\_  
Print name of authorized officer or authorized person of transferee Position or title

**962** \_\_\_\_\_ **963** Date \_\_\_\_\_  
Signature of authorized officer or authorized person of transferee Year Month Day

**Privacy notice**

Personal information (including the SIN) is collected and used to administer or enforce the Income Tax Act and related programs and activities including administering tax, benefits, audit, compliance, and collection. The information collected may be disclosed to other federal, provincial, territorial, aboriginal, or foreign government institutions to the extent authorized by law. Failure to provide this information may result in paying interest or penalties, or in other actions. Under the Privacy Act, individuals have a right of protection, access to and correction of their personal information, and to file a complaint with the Privacy Commissioner of Canada regarding the handling of their personal information. Refer to Personal Information Bank CRA PPU 005, PPU 015, and PPU 047 on Info Source at [canada.ca/cra-info-source](http://canada.ca/cra-info-source).

## Schedule A

## Information on the property disposed of and consideration received

Date of sale or transfer of all properties listed on Schedule A .....

500

Year Month Day

For properties sold or transferred on different dates, use a separate Form T2058.

## Capital property (other than shares and depreciable property)

	Brief legal description of the disposed property	Elected amount limits <sup>1</sup> FMV of the disposed property	Elected amount limits <sup>1</sup> Cost amount <sup>2</sup>	Agreed amount (cannot be "0")	Amount to be reported (line 513 minus line 512) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 516 plus line 518)
	510	511	512	513	514	515	516	517	518	519
1.										
2.										
3.										

## Capital property (shares only)

	Number and class of shares	Elected amount limits <sup>1</sup> FMV of the disposed property	Elected amount limits <sup>1</sup> Cost amount <sup>2</sup>	Agreed amount (cannot be "0")	Amount to be reported (line 523 minus line 522) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 526 plus line 528)
	520	521	522	523	524	525	526	527	528	529
1.										
2.										
3.										

## Depreciable property

	Description and prescribed class of the disposed property	Elected amount limits <sup>1</sup> FMV of the disposed property	Elected amount limits <sup>1</sup> Amount <sup>3</sup>	Agreed amount (cannot be "0")	Amount to be reported (line 533 minus line 532) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 536 plus line 538)
	530	531	532	533	534	535	536	537	538	539
1.										
2.										
3.										

## Information on the property disposed of and consideration received (continued)

## Inventory excluding real property

	Description (kind of disposed property)	Elected amount limits <sup>1</sup>  FMV of the disposed property	Elected amount limits <sup>1</sup>  Cost amount	Agreed amount (cannot be "0")	Amount to be reported (line 543 <b>minus</b> line 542) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 546 <b>plus</b> line 548)
	<b>540</b>	<b>541</b>	<b>542</b>	<b>543</b>	<b>544</b>	<b>545</b>	<b>546</b>	<b>547</b>	<b>548</b>	<b>549</b>
1.										
2.										
3.										

## Resource property

	Brief legal description of disposed property	Elected amount limits <sup>1</sup>  FMV of the disposed property	Elected amount limits	Agreed amount (cannot be "0")	Amount to be reported (line 553 <b>minus</b> line 552) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 556 <b>plus</b> line 558)
	<b>550</b>	<b>551</b>	<b>552</b>	<b>553</b>	<b>554</b>	<b>555</b>	<b>556</b>	<b>557</b>	<b>558</b>	<b>559</b>
1.			nil							
2.			nil							
3.			nil							

## Security or debt obligation property

	Description of disposed property	Elected amount limits <sup>1</sup>  FMV of the disposed property	Elected amount limits <sup>1</sup>  Cost amount	Agreed amount (cannot be "0")	Amount to be reported (line 563 <b>minus</b> line 562) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 566 <b>plus</b> line 568)
	<b>560</b>	<b>561</b>	<b>562</b>	<b>563</b>	<b>564</b>	<b>565</b>	<b>566</b>	<b>567</b>	<b>568</b>	<b>569</b>
1.										
2.										
3.										



Information on the property disposed of and consideration received (continued)										
Specified debt obligation (for financial institutions only)										
	Description	Elected amount limits <sup>1</sup>  FMV of the disposed property	Elected amount limits <sup>1</sup>  Cost amount	Agreed amount (cannot be "0")	Amount to be reported (line 573 minus line 572) <sup>4</sup>	Description of consideration received (non-share)	FMV of consideration received (non-share)	Number and class of share consideration received	FMV of share consideration received	Total FMV of the consideration received (line 576 plus line 578)
	570	571	572	573	574	575	576	577	578	579
1.										
2.										
3.										

Totals										

**Endnotes**

<sup>1</sup> For more information on limits, see Interpretation Bulletin IT-291, Transfer of Property to a Corporation Under Subsection 85(1).

<sup>2</sup> Adjusted cost base (subject to adjustment under section 53).

<sup>3</sup> The lesser of the undepreciated capital cost of all property of the class and the cost of the property.

<sup>4</sup> If the amount is greater than 0, it must be reported either as a capital gain or as income, whichever applies. Also, in the case of depreciable property, a portion of the amount may have to be reported as a capital gain while another portion of the amount may have to be reported as income.

**Schedule D**  
**Québec Tax Election Form TP-529-V**

*See attached.*

# Transfer of Property by a Partnership to a Taxable Canadian Corporation

This form is to be used by any partnership (the transferor) and any taxable Canadian corporation (the transferee) to which the partnership has transferred property for consideration that includes a share of the transferee's capital stock. An election for the transfer pursuant to subsection 85(2) of the *Income Tax Act* (ITA) must have been made with the Canada Revenue Agency (CRA) by means of form T2058, *Election on Disposition of Property by a Partnership to a Taxable Canadian Corporation*. Note that, if the conditions listed in Table 2 (see page 6) are met, a transferor and transferee (the parties) can **agree on an amount that is different** from the one in form T2058.

This form must also be completed in order to make:

- a **rollover application for Québec income tax purposes** if, by reason of subsection 13(21.2) of the ITA, the election under subsection 85(2) of the ITA cannot be made; or
- an **application to the Minister** to amend a previous TP-529-V form, where:
  - the parties had agreed on an amount that was the same as the one in form T2058 but wish to agree on a different amount;

- the parties had agreed on an amount that was different from the one in form T2058 and wish to cancel or change the amount; or
- the parties wish to change the amount they agreed on as part of a rollover application for Québec income tax purposes only.

The conditions in Table 2 (see page 6) must be met in order for either application mentioned above to be made.

## Important

File this form and the required documents (see page 5) **separately from any income tax return**. Only the person authorized to sign for the transferor can file this form for its members and, if applicable, the members of any partnership that is a member.

## 1 Identification

### 1.1 Transferor

Identification number	File	Québec enterprise number (NEQ)
01a S P 0001	01b	
Name or business name of transferor		
02		
Street number	Street name or PO box	Suite
03	03a	03b
City, town or municipality		Province
03c	03d	03e
Fiscal period of the transfer		
Start date of fiscal period	End date of fiscal period	
04 Y Y Y Y M M D D	05 Y Y Y Y M M D D	

### 1.2 Transferee

Identification number	File	Québec enterprise number (NEQ)
10a IC 0001	10b	
Name of corporation		
11		
Street number	Street name or PO box	Suite
12	12a	12b
City, town or municipality		Province
12c	12d	12e
Taxation year of the transfer		
Start date of taxation year	End date of taxation year	
13 Y Y Y Y M M D D	14 Y Y Y Y M M D D	

### 1.3 Contact person

Name of contact person	Area code	Phone
20	20a	



14M4 ZZ 49527752

## 2 Details concerning certain applications

Complete this part if the conditions in Table 2 (page 6) are met and the parties are making one of the following applications:

- an application to agree on an amount that is different from the amount in form T2058 (complete section 2.1);
- a rollover application for Québec income tax purposes only if, by reason of subsection 13(21.2) of the ITA, the election under subsection 85(2) of the ITA cannot be made (complete section 2.2);
- an application to the Minister to amend a previous TP-529-V form, if:
  - the parties had agreed on an amount that was the **same** as the one in form T2058 but wish to agree on a different amount (complete section 2.1); or
  - the parties had agreed on an amount that was **different** from the one in form T2058 and wish to change the amount (complete section 2.1).

You do not have to complete Part 2 for other types of applications to the Minister, but the conditions in Table 2 (see page 6) must be met.

### 2.1 Application to agree on a different amount

If, for a transferred property, the agreed amount in column E of the table in section 3.1 is different from the amount in form T2058, is the difference **entirely (or almost entirely)** attributable to the difference between the cost of the property (for purposes of Québec legislation) in column C of the table and the cost of the property (for purposes of federal legislation) in form T2058?

30 ☐ Yes ☐ No

If you answered **No**, explain the difference:

30a .....

We must deem the reason to be acceptable in the circumstances.

### 2.2 Rollover application

If, by application of subsection 13(21.2) of the ITA, the election under subsection 85(2) of the ITA cannot be made, and the parties wish to make a rollover application for Québec income tax purposes only, provide the following information:

- Are the parties dealing at non-arm's-length? ..... 40 ☐ Yes ☐ No
- Has all or substantially all (90% or more) of the transferor's property been transferred to the transferee? ..... 41 ☐ Yes ☐ No
- Is there a written agreement related to the transfer? ..... 42 ☐ Yes ☐ No
- Does a price adjustment claim apply to any of the transferred property? ..... 43 ☐ Yes ☐ No
- Complete the table below with the number and undepreciated capital cost (UCC) of each class of property the transferred property belongs to.

	A	B
	Class number	UCC before transfer
44		
45		
46		
47		
48		

## 3 Particulars of the transferred property and the consideration received

If shares of the capital stock of a private corporation are included in the transfer, provide the following information:

Name of the private corporation			
50			
Identification number	File	Québec enterprise number (NEQ)	Paid-up capital of shares transferred
51a	0001	51b	52



14M5 ZZ 49527753

3 Particulars of the transferred property and the consideration received (continued)

If multiple transfers of depreciable property were carried out at the same time, they must be entered in the order chosen by the transferor.

Unless otherwise indicated, it is not necessary to provide documents to support the elected order of transfer, the information provided in this section or the method used to evaluate each transferred property. However, you must keep any relevant documents for audit purposes.

Enter the fair market value (FMV) of the property and the FMV of the consideration received as calculated on the date of transfer. If you need more space, attach a separate sheet showing the same information.

3.1 Transferred property and agreed amount

Date of transfer of the property below:

54

Y Y Y Y M M D D

► Use a separate copy of this part for any property that was transferred on a different date.

	A Description of property	Limits respecting the agreed amount			E Agreed amount <sup>2</sup>	F Col. E – Col. C <sup>3</sup> (if the result is negative, enter 0)
		B FMV of property	C Cost of property <sup>1</sup>	D FMV of the consideration received (other than shares)		
55						
Capital property other than depreciable property (short description)						
1		.	.	.	.	.
2		.	.	.	.	.
3		.	.	.	.	.
4		.	.	.	.	.
Depreciable property (short description and prescribed class)						
5		.	.	.	.	.
6		.	.	.	.	.
7		.	.	.	.	.
8		.	.	.	.	.
9		.	.	.	.	.
10		.	.	.	.	.
11		.	.	.	.	.
Inventory (type)						
12		.	.	.	.	.
13		.	.	.	.	.
14		.	.	.	.	.
Mining property (short description)						
15		.	N/A	.	.	.
16		.	N/A	.	.	.
Securities and debt obligations (short description)						
17		.	.	.	.	.
18		.	.	.	.	.
Other <sup>4</sup> (short description)						
19		.	.	.	.	.
20		.	.	.	.	.



**3.2 Consideration received**

	A Line of the table in section 3.1 associated with the property	B Short description	C Number		D Class	E Total FMV of the consideration received (Col. D of the table in section 3.1 + FMV of shares)
56a						
56b						
56c						
56d						
56e						

  

	F Cash surrender value per share (\$)	G Tax value of paid-up capital per share (\$)	H Are the shares voting shares?		I Are the shares retractable?	
			Yes	No	Yes	No
56a			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
56b			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
56c			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
56d			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
56e			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**4 Penalty** (for late filing of the form or an application to the Minister)

If this transfer results in more than one penalty, only the highest penalty must be paid.

FMV of the transferred property	60	
Agreed amount for the property	- 61	
Subtract line 61 from line 60.	= 62	
	× 63	0.25%
Multiply line 62 by 0.25%.	= 64	
Number of months <sup>5</sup>	× 65	
Multiply line 64 by the number entered on line 65.	= 66	
Number of months entered on line 65 multiplied by \$100	67	
Enter the amount on line 66, the amount on line 67 or \$5,000, whichever is <b>least</b> .	Penalty 68	

**5 Certification**

We, the parties shown in Part 1, are filing this form for one of the following reasons:

- ☐ 70 We have made an election under subsection 85(2) of the ITA for the property described in Part 3.
- ☐ 71 We are filing an application to the Minister under the third paragraph of section 522 of the *Taxation Act* for the property described in Part 3.
- ☐ 72 We are submitting a rollover application for Québec income tax purposes because no election may be made under subsection 85(2) of the ITA by reason of subsection 13(21.2) of the ITA.

We certify that the information given in this form and in any enclosed documents is accurate and complete.

\_\_\_\_\_  
Name of the authorized signee for the transferor<sup>6</sup> (please print)

\_\_\_\_\_  
Name of authorized signee for the transferee<sup>6</sup> (please print)

\_\_\_\_\_  
Signature of authorized signee for the transferor

\_\_\_\_\_  
Signature of authorized signee for the transferee

\_\_\_\_\_  
Date

**Do not use this space**

Date de réception	Autorisation	Montant faisant l'objet d'une pénalité	Pénalité	Versement	Total



14M7 ZZ 49527755

## Information

Table 1 lists the documents to enclose with this form, as well as the filing deadline, by application type. It also indicates whether the conditions in Table 2 on the next page must be met and if the parties must complete Part 2 above.

**Table 1 – General information**

Application type	Conditions in Table 2	Complete Part 2	Documents to enclose	Filing deadline
Original application				
<ul style="list-style-type: none"> <li>Application to agree on an amount that is the same as the one in form T2058</li> </ul>	No	No	<ul style="list-style-type: none"> <li>A copy of form T2058 and any other document sent to the CRA</li> <li>Contact information<sup>7</sup> for the members of: <ul style="list-style-type: none"> <li>the transferor</li> <li>any partnership that is a member of the transferor</li> </ul> </li> </ul>	<p>The <b>later</b> of the following dates:</p> <ul style="list-style-type: none"> <li>The earliest of the filing deadlines for the income tax returns in question<sup>8</sup></li> <li>The last day of the second month following the later of the dates on lines 05 and 14 in Part 1</li> </ul> <p>The parties must pay a late-filing penalty if they file this form and the required documents after the deadline.</p>
<ul style="list-style-type: none"> <li>Application to agree on an amount that is different from the one in form T2058</li> </ul>	Yes	Yes (section 2.1)		
<ul style="list-style-type: none"> <li>Rollover application for Québec income tax purposes</li> </ul>	Yes	Yes (section 2.2)	<ul style="list-style-type: none"> <li>Contact information<sup>7</sup> for the members of: <ul style="list-style-type: none"> <li>the transferor</li> <li>any partnership that is a member of the transferor</li> </ul> </li> <li>The adjusted cost base (ACB) calculation, if a transferred property includes an interest in a partnership</li> <li>If there is a written agreement for the transfer ("Yes" on line 42), a copy of the written agreement</li> </ul>	
Application to the Minister to amend a previous TP-529-V form				
<ul style="list-style-type: none"> <li>The parties had agreed on an amount that was <b>the same as</b> the one in form T2058 but wish to agree on a <b>different</b> amount</li> </ul>	Yes	Yes (section 2.1)	<p>A copy of form T2058 and any other document sent to the CRA, if the previous T2058 form was amended</p>	<p>The application must be filed within three years of the filing deadline for the TP-529-V form the parties want to amend.</p> <p>However, it can be filed later if we authorize the parties to do so.</p> <p>The parties must pay a late-filing penalty if they file an application to the Minister after the filing deadline for the TP-529-V form the parties want to amend.</p>
<ul style="list-style-type: none"> <li>The parties had agreed on an amount that was <b>different</b> from the one in form T2058 and wish to <b>change</b> it</li> </ul>	Yes	Yes (section 2.1)		
<ul style="list-style-type: none"> <li>The parties had agreed on an amount that was <b>different</b> from the one in form T2058 and wish to <b>cancel</b> it</li> </ul>	Yes	No		
<ul style="list-style-type: none"> <li>The parties wish to change the amount they agreed on as part of a rollover application for Québec income tax purposes</li> </ul>	Yes	No	The documents enclosed with the <b>original</b> rollover application for Québec income tax purposes	



**Table 2 – Conditions for certain applications**

Application type	Conditions	Note
Application to agree on an amount that is different from the one in form T2058	<ul style="list-style-type: none"> <li>At least one member of the transferor must have been resident in Québec on the date on line 05 in section 1.1.</li> <li>The transferor must have carried on at least 90% of its business in Québec in the fiscal period on lines 04 and 05 in section 1.1 (the fiscal period of the transfer).</li> <li>The transferee must have carried on at least 90% of its business in Québec in the taxation year on lines 13 and 14 in section 1.2 (the taxation year of the transfer).</li> </ul>	The proportion of business carried on in Québec must be calculated in accordance with the regulations made under section 771 of the <i>Taxation Act</i> for both the transferee and the transferor. For the transferor, the proportion must be calculated as though the transferor were a corporation with a fiscal year that corresponds to a taxation year.
Rollover application for Québec income tax purposes		
Application to the Minister to amend a previous TP-529-V form (all situations)		

**Notes**

- Enter the following in column C:
  - for **capital property other than depreciable property**, the adjusted cost base (it is subject to adjustments under sections 255 and 257 of the *Taxation Act*);
  - for **depreciable property**, the lesser of the following:
    - the capital cost of the property, or
    - the UCC of all the property in that class immediately before the transfer;
  - for **inventory, securities and debt obligations**, the cost amount.

If the transferred property is class 14.1 property acquired before January 1, 2017, contact us.
- The agreed amount must generally be the same as the amount in form T2058. However, if the parties file a rollover application for Québec income tax purposes, an application to the Minister or another application for which you are completing Part 2, you can enter a different amount, calculated while taking into account the limits in columns B, C and D. The agreed amount must therefore be:
  - equal to or greater than:**
    - the lesser of the amounts in columns B and C, except for mining property, **and**
    - the amount in column D; and
  - less than or equal to** the amount in column B.

If the transferred property is depreciable property and, on the 30th day following the transfer, the transferor or a related person is its owner or has the right to acquire it (except for a right that exists only as a guarantee and arises from a hypothec, a sale contract or similar title), the agreed amount under the rules above must be equal to or less than the **lesser** of the following:

  - the capital cost of the property; or
  - the UCC of the applicable class **multiplied** by the ratio between the FMV of the property and the FMV of all the property in that class.
- The transfer of the property by the transferor to the transferee constitutes a disposition of property, and the agreed amount (column E) represents both the proceeds of disposition for the transferor and the capital cost of the property for the transferee. Depending on the type of property, the transferor must report all amounts entered in column F as a capital gain or as income. For depreciable property, part of the amount can be reported as a capital gain and part as business or property income.
 

If you entered 0 in column F because the amount is negative, the amount may constitute a capital loss or, for depreciable property, a terminal loss.

For more on the tax treatment of the disposition of property, see guide IN-120-V, *Capital Gains and Losses*.
- The property can be capital property that is an immovable held by a non-resident or a NISA fund No. 2.
- Enter the number of months or fraction of a month from the filing deadline (see page 5) to the day the required documents were sent or, for an application to the Minister, the number of months or fraction of a month from the filing deadline for the TP-529-V form that the parties are amending to the date of the application to the Minister.
- Attach a copy of the document authorizing the person to sign.
- Provide each member's name, address, Québec enterprise number (NEQ) and, depending on whether the members are individuals, corporations, trusts or partnerships, their social insurance number or identification number.
- The income tax returns in question are:
  - the income tax returns of the members of the transferor for the taxation year in which the fiscal period covered by lines 04 and 05 in section 1.1 ends;
  - the income tax returns of the members of any partnership that is a member of the transferor, for the taxation year in which the member partnership's fiscal period that includes the period covered by lines 04 and 05 in section 1.1 ends;
  - the transferee's income tax return for the taxation year covered by lines 13 and 14 in section 1.2.

