

THOMSON REUTERS

Taxation of Corporate Reorganizations

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Note: The date in brackets (09/2023) in the top left and right corners of each page indicates the release date (month/year), not the release number. For 2023 the release date will continue to follow the same format.

The following are highlights of the second release of 2023.

VOLUME 2

CAPITAL TRANSACTIONS

V — Non-Arm's Length Sale of Shares (Section 84.1)

Non-arm's length deeming provisions under Conditions of Application has been updated with new commentary under sections 40, 84.1, 87, 152, 160. Topics discussed include consequences, intergenerational business transfer, immediate intergenerational business transfer, gradual intergenerational business transfer, and definition of child.

Table of Documents and Bibliography have been updated. Three CRA Views documents have been added.