

# TAX MEASURES FOR INTERNATIONAL FINANCIAL CENTRES (IFC)

Application for IFC qualification certificate

**ORIGINAL TEXT IN FRENCH**

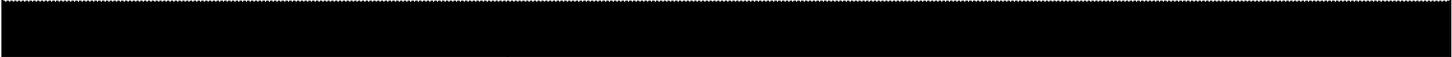
This form has been translated for information purposes only.

1. General information on the applicant				
Name of the corporation that intends to operate the IFC (corporate name)				
Address of the corporation that intends to operate the IFC (Head Office)				
City	Province	Country	Postal code	Website
Address of the IFC's facility				
Same address as the corporation. If the address is different, fill in the boxes below. If more than one facility, please write the addresses in an				
City	Province	Postal code	Website	
	Québec			
Identification number assigned by Revenu Québec to the corporation that intends to operate the IFC			Québec enterprise number (NEQ) of the corporation that intends to operate the IFC	

2. Head of the IFC		
① Attach to this form a resolution of the board of directors of the corporation authorizing this person to act on its behalf.		
Ms. Mr.	First name	Last name
Title		
Telephone	E-mail	
	Ext.:	

**3. Person responsible for the application (if different from the head of the IFC)**

① Person who completes the form and who the Ministère could contact for additional information.

Ms. Mr.	First name	Last name
		
Title		
		
Telephone	E-mail	
	Ext.:	

**4. Fiscal period end date of the corporation that intends to operate the IFC**

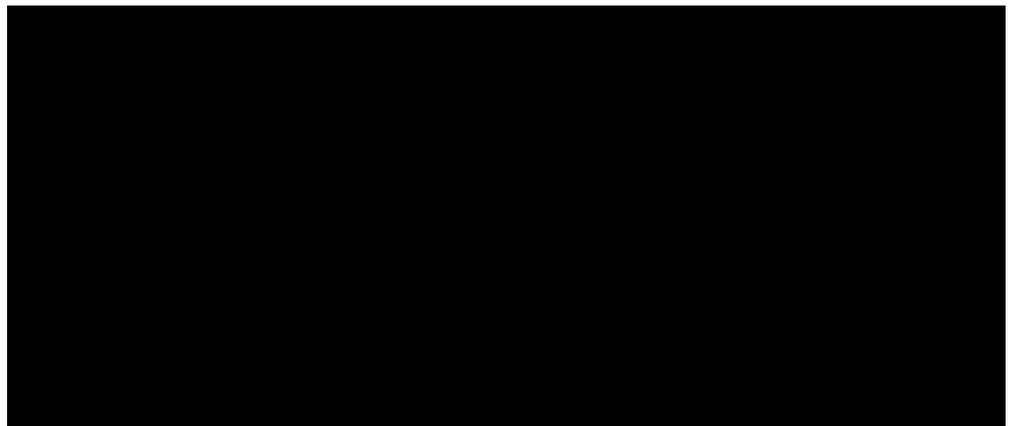

mm/dd

**5. Registration with regulatory bodies**

① Please enclose with your application proof of registration with the relevant regulatory bodies.

Is the corporation registered with regulatory bodies (AMF, OSC, SEC, etc.)? Yes      No

If so, specify which ones and in what capacity in the box or in an annex.



If not, is the corporation exempted from registering with these bodies? Yes      No

① An investment dealer, investment advisor or portfolio manager that is exempt from registration must obtain written confirmation from the AMF and attach a copy of that document to his or her application.

6. Stock ownership	
Names of the specified shareholders of the corporation that intends to operate the IFC ⓘ The term "specified shareholder" means, in particular, a shareholder holding at least 10% of a class of shares issued by the corporation.	Percentage of issued voting shares held
	%
	%
	%
	%
	%
	%
	%
Names of the shareholders having direct control of the corporation that intends to operate the IFC	Country of origin

7. Change in employment	On last December 31	On December 31 of the 1 <sup>st</sup> year	On December 31 of the 2 <sup>nd</sup> year	On December 31 of the 3 <sup>rd</sup> year
A) Estimate of the number of employees in Québec in the corporation that intends to operate the IFC				
B) Estimate of the number of employees in the IFC ⓘ All employees whose functions will be devoted at least in part to the carrying out of qualifying international financial activities.				
C) Estimate of the number of employees eligible for tax benefits ⓘ Only employees with 75% or more of their duties dedicated to the carrying out of qualifying international financial activities.				

8. Information on eligible employees					
Type of position	Estimate of the number of employees			Average annual salary or salary range*	Minimum training required**
	Year 1	Year 2	Year 3		
* Salary range:			** Required training		
< \$25 000	\$70 000 to \$84 999		· DES or DEP: Secondary school diploma or vocational training diploma		
\$25 000 to \$39 999	\$85 000 to \$99 999		· DCS: Diploma of Collegial Studies		
\$40 000 to \$49 999	\$100 000 to \$124 999		· Undergraduate degree: Bachelor's degree or certificate		
\$50 000 to \$59 999	\$125 000 to \$149 999		· Graduate degree: Master's degree or other graduate diploma		
\$60 000 to \$69 999	> \$150 000		· Postgraduate degree: Doctorate		

9. Qualifying international financial activities that will be carried out

Qualifying international financial activities are grouped into three broad categories. Corporations applying for IFC status may carry out one or more activities.

**Step 1.** For each category, check the activities that will be carried out by the IFC.

**A) Activities arising from an outsourcing contract**

- ① Activities carried out as part of a service agreement and related to financial operations performed outside Canada by a foreign financial entity.

Outsourcing contract

**B) Back office activities**

- ① Back office activities resulting from international financial transactions carried out by another entity.

Back office activities on behalf of a third party

**C) International financial transactions**

- ① Financial transactions carried out on behalf of a foreign client or including a foreign component —product with a foreign exposure, foreign counterparty, etc.

There are 24 types of qualifying international financial transactions, divided into 8 sectors of activity.

<p><b>Insurance</b></p> <ul style="list-style-type: none"> <li>Damage insurance brokerage</li> <li>Reinsurance</li> </ul>	<p><b>International trade financing</b></p> <ul style="list-style-type: none"> <li>Documentary collections</li> <li>Bill of exchange</li> <li>Letter of credit</li> <li>Discount operations</li> </ul>
<p><b>Commercial banks and lending institutions</b></p> <ul style="list-style-type: none"> <li>Deposits of money</li> <li>Foreign exchange transactions</li> <li>Loans of money</li> <li>Loans or deposits of money between IFCs</li> <li>Factoring services</li> <li>Leasing services</li> </ul>	<p><b>Asset management</b></p> <ul style="list-style-type: none"> <li>Administration of shares of a qualified investment fund</li> <li>Securities advising or portfolio management</li> <li>Distribution of shares of a qualified investment fund</li> <li>Management of a qualified investment fund</li> <li>Organization of a qualified investment fund</li> </ul>
<p><b>Investment banking</b></p> <ul style="list-style-type: none"> <li>Financial engineering services</li> <li>Financial packaging services</li> </ul>	<p><b>Immigrant Investor Program</b></p> <ul style="list-style-type: none"> <li>Activities performed under the Québec Immigrant Investor Program</li> </ul>
<p><b>Brokerage and cash management</b></p> <ul style="list-style-type: none"> <li>Cash management</li> <li>Securities trade or securities distribution</li> </ul>	<p><b>Fiduciary and clearing house services</b></p> <ul style="list-style-type: none"> <li>Clearing house services</li> <li>Fiduciary services</li> </ul>

## 9. Qualifying international financial activities that will be carried out (cont.)

**Step 2.** Provide detailed information for each of the activities checked in Step 1, clearly specifying the foreign component.

① To be admissible, financial activities must involve a foreign financial product, a foreign client, or both.

- Clients:
  - individuals, pension funds, banks, corporations, etc.
  - Canadian resident, foreign national or both
- Activities:
  - detailed description of the business process specific to each of the international financial activities that the IFC intends to carry out
    - identify each of the steps involved in the completion of the international financial transaction, back office activity or activity arising from an outsourcing contract, in particular:
      - transaction introduction and negotiation
      - method of remuneration
      - transaction recording
      - transaction settlement, delivery and clearing
      - record keeping, accounting and production of statements or reports
      - compliance, customer services
      - monitoring, control and accountability for the risks involved
    - for each step, indicate **by whom** and **where** the activity will be carried out: by the IFC team, by a team of the corporation outside the IFC or by a local or foreign third party.
    - for activities that will be carried out in respect of a venture capital fund, mutual fund, segregated fund, exchange-traded fund, securities portfolio, etc., provide the following additional details:
      - name and code of the fund or portfolio
      - percentage of foreign exposure
      - names of the investors holding more than 10% of the shares of the fund or portfolio, if applicable
- Employees:
  - Detailed and recent organization chart of the IFC's teams including the title of each of the planned positions and a detailed description of each of the functions
- Outsourcing contract: provide an up-to-date copy for each contract. If the contract is written in a language other than French, provide a translation for the names of all services, job titles and tasks listed in the contract.

10. Non-arm's length relation

Does the operator of the IFC intend to carry out qualifying international financial activities on behalf of a **related person**?

① For example, an activity carried out by an IFC on behalf of its parent company, subsidiary or sister company constitutes a transaction between related persons. The same applies where a corporation provides services to an individual with whom it is not dealing at arm's length.

Yes      No

If **YES**, name this person and indicate the nature of the activities carried out on their behalf in the space below or in an annex:

11. Declaration of compliance

Will the business constituting the IFC meet the following eligibility conditions?

It will be operated by a corporation.	Yes	No
It presents a new project with new activities that: <ul style="list-style-type: none"> <li>– have not started more than 12 months before the date of the application for qualification certificate or will start no later than 24 months after the date of the application for qualification certificate;</li> <li>– do not constitute the continuity of a service or activity already carried out by a corporation in Québec.</li> </ul>	Yes	No
It will maintain, at all times, a minimum of six eligible full-time employees at each of its eligible facilities. <p>① The term "eligible employees" includes local employees and foreign specialists who hold a qualification certificate or an annual certificate. The term "full-time" means a minimum of 26 hours per week, with a minimum expected duration of 40 consecutive weeks.</p>	Yes	No
All of its activities will focus on qualifying international financial activities.	Yes	No
The management of all qualifying international financial activities will be carried out in one or more of the eligible facilities within the territory of the urban agglomeration of Montréal.	Yes	No

If one or more conditions cannot be met in whole or in part, indicate the reason in the space below or in an annex:

12. Signature of the person responsible for the application for qualification certification

I, the undersigned, hereby certify that all of the information provided in support of this application for IFC qualification certificate is true and complete.

Upon request, I will provide the Ministère des Finances, Revenu Québec or their representatives with any information concerning this application for certification or any question pertaining to the constitution and operation of the IFC.

I also understand that, under the provisions of the *Act respecting international financial centers*, the Minister may retroactively revoke any qualification certificate or annual certificate issued in respect of an IFC where information or documents brought to the Minister's attention so warrant.

Lastly, I undertake to advise the Ministère des Finances, in writing as soon as possible, of any significant change regarding the IFC: change in the IFC's address or ownership, restructuring, addition or loss of activities or staff, change in the manner in which qualifying international financial activities are carried out, etc.

[Redacted signature area]

Signature of the head of the IFC or the person responsible for the application

Date (yyyy/mm/dd)

[Redacted name area]

Name (print)

[Redacted title area]

Title

### 13. Control sheet

Documents to be sent by e-mail to [dpif@finances.gouv.qc.ca](mailto:dpif@finances.gouv.qc.ca) or via our secure Biblio MFO site.

To find out how to access our secure site, contact us by e-mail at [dpif@finances.gouv.qc.ca](mailto:dpif@finances.gouv.qc.ca).

Check the boxes corresponding to the documents being sent:

Application form duly completed and signed

The incorporation papers of the corporation, including its articles of incorporation and certificate of incorporation

Organization chart illustrating the structure and ownership of the corporation. Include all corporations with which it is associated and indicate the percentage of voting shares held by each corporation

The most recent financial statements of the corporation \*

Letter confirming your registration (or proof of exemption from registration) with the regulatory bodies to which the corporation is subject, if available (see section 5) \*

Resolution of the board of directors designating the head of the IFC

Copy of the teleworking policy of the corporation or part of the business that will form the IFC

Business plan and all other documents deemed useful to understand the international financial activities that the corporation intends to carry out within the IFC, in particular:

A recent copy of each outsourcing contract

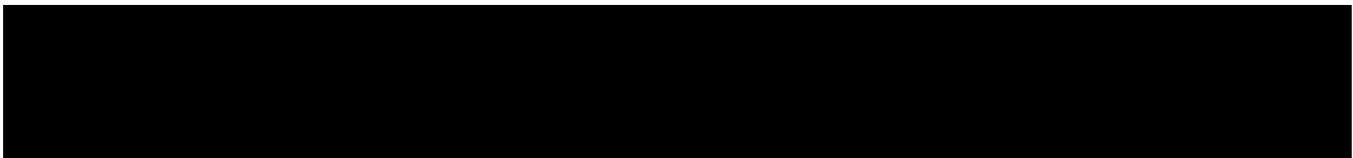
Detailed description of the business process for each activity

Detailed organization chart of the IFC's teams and detailed description of each function

The budgeted financial statements of the business that will constitute the IFC (for the first three years) \*

The form duly completed, signed and sent to the Ministère des Finances du Québec is considered the official application. By submitting an application, the corporation undertakes to pay the related fees according to the established payment terms (see the [Fees and Terms of Payment](#) section on the Ministère's website).

\* You may file your application without financial statements or proof of registration with regulatory bodies. Please indicate below the date on which you plan to send them to us.



① The head of the IFC or the person responsible for this application must ensure that all required documents are sent to the Ministère. To avoid any delay in processing your application, please make sure that this control sheet is duly completed and signed.

I declare that I have enclosed all the requisite documents with the application or have explained their absence, as the case may be.

Date (yyyy/mm/dd)

Signature of the head of the IFC or the person responsible for the application