

# North American Tax Handbook 2009

## GENERAL OUTLINE

### Canada

- Federal Taxation
  - Corporate Taxation
  - Individual Taxation
- Provincial Taxation
  - Corporate Taxation
  - Individual Taxation

### Mexico

- Federal Taxation
  - Corporate Taxation
  - Individual Taxation
- State Taxation
  - Corporate Taxation
  - Individual Taxation

### United States

- Federal Taxation
  - Corporate Taxation
  - Individual Taxation
- State Taxation
  - Corporate Taxation
  - Individual Taxation

## DETAILED OUTLINE

## FEDERAL TAXATION

### CORPORATE TAXATION

#### Introduction

1. CORPORATE INCOME TAX
  - 1.1. Type of tax system
  - 1.2. Taxable persons
    - 1.2.1. Residence
  - 1.3. Taxable income
    - 1.3.1. General
    - 1.3.2. Exempt income
    - 1.3.3. Deductions
    - 1.3.4. Valuation of inventory
    - 1.3.5. Depreciation and amortization
    - 1.3.6. Reserves and provisions
  - 1.4. Capital gains

- 1.5. Losses
  - 1.5.1. Ordinary losses
  - 1.5.2. Capital losses
- 1.6. Rates
  - 1.6.1. Income and capital gains
  - 1.6.2. Withholding taxes
- 1.7. Incentives
- 1.8. Administration
  - 1.8.1. Taxable period
  - 1.8.2. Tax returns and assessment
  - 1.8.3. Payment of tax
  - 1.8.4. Rulings
2. GROUPS OF COMPANIES
  - 2.1. Group treatment
  - 2.2. Intercorporate dividends
3. OTHER TAXES ON INCOME
4. TAXES ON PAYROLL
  - 4.1. Payroll tax
  - 4.2. Social security contributions
  - 4.3. [Other: state name of tax]
5. TAXES ON CAPITAL
  - 5.1. Net worth tax
  - 5.2. Real estate tax
  - 5.3. [Other: state name of tax]
6. INTERNATIONAL ASPECTS
  - 6.1. Resident companies
    - 6.1.1. Foreign income and capital gains
    - 6.1.2. Foreign capital
    - 6.1.3. Double taxation relief
  - 6.2. Non-resident companies
    - 6.2.1. Taxes on income and capital gains
    - 6.2.2. Taxes on capital
    - 6.2.3. Administration
  - 6.3. Withholding taxes
    - 6.3.1. Dividends
    - 6.3.2. Interest
    - 6.3.3. Royalties
    - 6.3.4. Other
    - 6.3.5. Withholding tax rates charts
7. ANTI-AVOIDANCE
  - 7.1. General
  - 7.2. Transfer pricing
  - 7.3. Thin capitalization
  - 7.4. Controlled foreign company
8. VALUE ADDED TAX

- 8.1. General
- 8.2. Taxable persons
- 8.3. Taxable transactions
- 8.4. Taxable amount
- 8.5. Exemptions
- 8.6. Rates
- 8.7. Non-residents

## 9. MISCELLANEOUS INDIRECT TAXES

# INDIVIDUAL TAXATION

## INTRODUCTION

- 1. INCOME TAX
  - 1.1. Taxable persons
  - 1.2. Taxable income
    - 1.2.1. General
    - 1.2.2. Exempt income
  - 1.3. Employment income
    - 1.3.1. Salary
    - 1.3.2. Benefits in kind
    - 1.3.3. Pension income
    - 1.3.4. Directors' remuneration
  - 1.4. Business and professional income
  - 1.5. Investment income
  - 1.6. Capital gains
  - 1.7. Personal deductions, allowances and credits
    - 1.7.1. Deductions
    - 1.7.2. Allowances
    - 1.7.3. Credits
  - 1.8. Losses
  - 1.9. Rates
    - 1.9.1. Income and capital gains
    - 1.9.2. Withholding taxes
  - 1.10. Administration
    - 1.10.1. Taxable period
    - 1.10.2. Tax returns and assessment
    - 1.10.3. Payment of tax
    - 1.10.4. Rulings
- 2. OTHER TAXES ON INCOME
- 3. SOCIAL SECURITY CONTRIBUTIONS
- 4. TAXES ON CAPITAL
  - 4.1. Net wealth tax
  - 4.2. Real estate tax
  - 4.3. [Other: state name of tax]

- 5. INHERITANCE AND GIFT TAXES
- 6. INTERNATIONAL ASPECTS
  - 6.1. Resident individuals
    - 6.1.1. Foreign income and capital gains
    - 6.1.2. Foreign capital
    - 6.1.3. Double taxation relief
  - 6.2. Expatriate individuals
  - 6.3. Non-resident individuals

## **PROVINCIAL / STATE TAXATION**

### **Corporate Taxation**

- 1. Tax system
  - 1.1. Imposition of tax
  - 1.2. Taxable persons
  - 1.3. Computation of taxable income
  - 1.4. Apportionment formula
  - 1.5. Tax rates
  - 1.6. Administration
- 2. Group taxation
  - 2.1. Group definition
  - 2.2. Consolidated returns and combined reporting
- 3. Other taxes
  - 3.1. Initial fees and registration taxes
  - 3.2. Annual capital and franchise taxes
  - 3.3. Employment and payroll taxes
- 4. Real estate tax
- 5. International aspects
  - 5.1. Domestic/Resident corporations
  - 5.2. Foreign/Non-resident corporations
  - 5.3. Withholding taxes on dividends
  - 5.4. Foreign tax credits
- 6. Sales and use taxes
  - 6.1. Sales and use tax rates
  - 6.2. Streamlined sales tax system
- 7. Municipal taxes

### **Individual Taxation**

- 1. Tax system
  - 1.1. Taxable persons
  - 1.2. Computation of taxable income
  - 1.3. Part-year residents and non-residents
  - 1.4. Tax rates
  - 1.5. Administration
- 2. Estate, inheritance, and gift taxes

- 2.1. Estate tax
- 2.2. Gift tax

3. Other taxes

- 3.1. Real property tax
- 3.2. Realty transfer tax

4. International aspects

- 4.1. Taxation of residents
- 4.2. Taxation of non-residents
- 4.3. Taxation of expatriates
- 4.4. Estate taxation on non-residents

5. Sales and use taxes

6. Municipal taxes