

Refer to the information and instruction sheet before you complete this form.
Tick the applicable boxes and complete the areas that apply.

Slip _____ of _____

Part I – Reporting person/partnership information

Corporation <input type="checkbox"/>	Business Number (BN) <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-between;"> R C </div>	Trust <input type="checkbox"/>	Trust account number <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-between;"> T </div>
Partnership <input type="checkbox"/>	Partnership identification number <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-between;"> R Z </div>	Individual <input type="checkbox"/>	Social Insurance Number <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-between;"> </div>
For what tax year/fiscal period are you filing this T106 Slip? From <div style="display: flex; justify-content: space-around; width: 100px;"> YearMonthDay </div>		To <div style="display: flex; justify-content: space-around; width: 100px;"> YearMonthDay </div>	

Part II – Non-resident information

1. Name of the non-resident			
2. Address of the non-resident and country of residence (see Instructions for information on country codes)			Country code <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-between;"></div>
3. Type of relationship:		If "1", is the non-resident in a country with which Canada does not have a tax treaty? <div style="display: flex; justify-content: space-around;"> Yes <input type="checkbox"/> No <input type="checkbox"/> </div> If yes, attach financial statements of the non-resident.	
1 <input type="checkbox"/> Non-resident is controlled by reporting person/partnership	2 <input type="checkbox"/> Non-resident controls reporting person/partnership	3 <input type="checkbox"/> Other	
4. State the main business activities for the transactions reported in Part III by entering the appropriate NAICS code(s). See instructions for NAICS codes.		5. State the main countries for the transactions reported in Part III by entering the appropriate country code(s) – see Instructions.	
NAICS code(s): 1 <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-between;"></div>	2 <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-between;"></div>	3 <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-between;"></div>	4 <div style="border: 1px solid black; padding: 2px; display: flex; justify-content: space-between;"></div>
6. Have you prepared or obtained contemporaneous documentation as described in subsection 247(4) of the <i>Income Tax Act</i> for the tax year/fiscal period with respect to the non-resident?		7. Have any of the transfer pricing methodologies (TPM) changed since the previous reporting period with respect to the non-resident?	
Yes <input type="checkbox"/> No <input type="checkbox"/>		Yes <input type="checkbox"/> No <input type="checkbox"/>	

Part III – Transactions between reporting person/partnership and non-resident

Enter in the appropriate box the monetary consideration (to the nearest Canadian dollar/ functional currency unit if applicable) derived or incurred for the following transactions with the non-resident. Enter the appropriate transfer pricing methodology (TPM) codes from the list in the Instructions.

Tangible Property

	Sold to non-resident	TPM		Purchased from non-resident	TPM
Stock in trade/raw materials	\$		\$		
Other (specify):	\$		\$		

Rents, Royalties and Intangible Property

	Revenue from non-resident	TPM		Expenditure to non-resident	TPM
Rents	\$		\$		
Royalties (e.g., for the use of patents, trademarks, secret formulas, know-how)	\$		\$		
License or franchise fees	\$		\$		
Intangible property or rights (acquired or disposed of)	\$		\$		

Services

Management, financial, administrative, marketing, training, etc	\$		\$		
Engineering, technical, construction, etc.	\$		\$		
Research and development.	\$		\$		
Commissions.	\$		\$		

Financial

Interest	\$		\$		
Dividends (e.g., common stock, preferred stock, deemed dividends)	\$		\$		
Sale of financial property (including factoring, securitizations and securities)	\$		\$		
Lease payments	\$		\$		
Securities Lending (fees and compensation payments)	\$		\$		
Insurance	\$		\$		
Other (excluding derivatives – see Part V):	\$		\$		

Other

Reimbursement of expenses	\$		\$		
Other	\$		\$		

Please enter the total of all entries made in each column of Part III. **A=** **B=**

Part IV – Loans, advances, investments and similar amounts

	Beginning balance		Increase		Decrease		Ending balance
Amounts owed by reporting person/partnership	\$	+	\$	–	\$	=	\$
Amounts owed to reporting person/partnership	\$	+	\$	–	\$	=	\$
Investment in non-resident (ACB)	\$	+	\$	–	\$	=	\$
Please enter the total of all entries made in each column of Part IV. C=			\$	D=			\$

Part V – Derivatives

	Number of contracts	Notional amount	Revenue from non-resident	Expenditure to non-resident
101 Interest Rate Contracts		\$	\$	\$
102 Foreign Exchange Contracts		\$	\$	\$
103 Credit Contracts		\$	\$	\$
104 Equity Contracts		\$	\$	\$
105 Commodity Contracts		\$	\$	\$
106 Index Contracts		\$	\$	\$
107 Fees (including commissions)		\$	\$	\$
108 Other payments / receipts (specify)		\$	\$	\$

Please enter the total of all entries made in each column of Part V

E= F=\$ G=\$ H=\$

Please enter in box I the total of all entries made in boxes A, B, C, D, G and H I=\$

Part VI – Current accounts

	Beginning balance	Increase	Decrease	Ending balance
Amount of accounts payable	\$ <input type="text"/>	+ \$ <input type="text"/>	– \$ <input type="text"/>	= \$ <input type="text"/>
Amount of accounts receivable	\$ <input type="text"/>	+ \$ <input type="text"/>	– \$ <input type="text"/>	= \$ <input type="text"/>

Instructions

If an election has been made under paragraph 261(3)(b) of the *Income Tax Act* to report in a functional currency, state all monetary amounts in that functional currency, otherwise state all monetary amounts in Canadian dollars (no cents).

Part II – Non-resident information

Q.1 and Q.2. Enter the name and address of the non-resident. For the list of country codes, see the CRA publication, T4061 – NR4 – *Non-Resident Tax Withholding, Remitting and Reporting guide*, Appendix A – Country Codes, at: cra.gc.ca/E/pub/tg/t4061/t4061-e.html.

Q.3. State the type of relationship that exists between the reporting person/partnership and the non-resident. The Canada Revenue Agency needs the relevant financial statements (in English or French) of the non-resident if the non-resident is controlled by the reporting person or partnership and is resident in a non-treaty country. Canada has income tax conventions (treaties) with more than 60 countries. These include the United States, the United Kingdom, France, Japan, and Australia. For information about the countries with which Canada has concluded an income tax treaty, contact your tax services office or consult the Internet at: fin.gc.ca.

Q.4. State the main business activities for the transactions reported in Part III by entering the appropriate North American Industrial Classification System (NAICS) codes. The current NAICS codes can be found at the Statistics Canada internet site, www23.statcan.gc.ca/imdb/p3VD.pl?Function=getVDPPage1&db=imdb&dis=2&adm=8&TVD=118464. You can enter more than one code.

Q.5. State the main countries for the transactions reported in Part III by entering the appropriate country code. You can enter more than one code. For the list of country codes, see the information provided under Q1. and Q2. above.

Q.6. Enter **yes** or **no** to the question. In general, subsection 247(4) of the *Income Tax Act* relates to the requirement to maintain and make available contemporaneous transfer pricing documentation. You can find more information on contemporaneous documentation requirements in Information Circular 87-2, *International Transfer Pricing*. The circular is available at our tax services offices and on the Internet at: canada.ca/taxes.

Part III – Transactions between reporting person/partnership and non-resident

Enter (to the nearest Canadian dollar/functional currency unit if applicable) the monetary consideration derived or incurred for the transactions in Part III. Only record in Part III those amounts that apply to the non-resident described in Part II. Report gross amounts in the two columns.

The "Sold to non-resident" and "Revenue from non-resident" refers to gross sales and revenue received from non-arm's length transactions with non-residents. For example, this includes transactions related to exports from Canada and services provided to the non-resident.

The "Purchased from non-resident" and "Expenditure to non-resident" refers to gross purchases and expenditures made relating to non-arm's length transactions with non-residents. For example, this includes transactions related to imports into Canada and services provided by the non-resident.

For the banking industries, the line for "Stock in trade/raw materials" must be used to report bonds, debentures, loans, mortgage transactions. The normal interest income and expense on loans and advances with the non-arm's length non-resident(s) must be reported in the Financial section.

Part V – Derivatives

The column for Notional Amounts applies to swap transactions. The terms used in this section are described below:

Descriptions

101 Interest Rate Contracts This section includes — forward rate arrangements — swaps — options purchased — options written	104 Equity Contracts — includes contracts used to transfer the economic benefits of securities and debt instruments
102 Foreign Exchange Contracts — forward contracts — cross currency swaps — cross currency interest rate swaps — options purchased — options written	105 Commodity Contracts — includes swaps, forward contracts and options
103 Credit Contracts — risk transfer arrangements	106 Index Contracts — includes all contracts that derive their value from publicly traded indices
	107 Fees — any fee or commission charged on derivative transactions
	108 Other Payments / Receipts — other payments and receipts not identified above

Do you need more information?

For general enquiries, contact the Business Enquiries section of your tax services office. For detailed information about completing the form, contact the International Audit Division of your tax services office. The address and telephone number of the tax services office are listed under "the Canada Revenue Agency" in the Government of Canada section of your telephone book and on the Internet at: canada.ca/taxes.