企业税 / 企业税 题册

84 道主题题＋84 道变式题，全部本站原创，不是官方考题。每个选项都有解析。

用法

1. 按章做主题题，限时按真考节奏（45 题 70 分钟＝每题约 93 秒）。
2. 对答案时四个选项的解析都读：错项为什么错，比对项为什么对更常被考。
3. 做错的题，当天做它的变式题；三天后再做一次。

第 1 章 · T2125 自雇收入 / Self-Employment & Form T2125

自雇与小生意 / Self-employment and small business

带 ′ 的是同一考点的变式题：主题题做错时再做它。

1. Marcus signs an agreement titled 'Independent Contractor Agreement' with a logistics firm. The firm sets his daily shift from 8:00 a.m. to 4:00 p.m., provides the delivery van and pays for all fuel and repairs, prohibits him from hiring helpers or working for other clients, and pays him a fixed hourly wage regardless of delivery volume. If the CRA reviews this arrangement, what is the most likely outcome?

Marcus 与一家物流公司签了一份题为「独立承包商协议」的合同。公司规定他每天早上 8 点到下午 4 点排班，提供送货厢式车并承担全部油费与维修费，禁止他雇助手或为其他客户工作，且不论送货量多少都按固定时薪付酬。如果 CRA 审查这段关系，最可能的结果是什么？

a. The CRA will recharacterize the relationship as employment based on the four-factor test, and the logistics firm will be liable for unremitted source deductions, penalties, and interest.

b. The CRA will respect the self-employed status because both parties voluntarily signed a written independent contractor agreement.

c. The CRA will classify Marcus as self-employed for income tax purposes so he can deduct expenses, while charging only the firm for employer EI.

d. The CRA will recharacterize the relationship as employment, but only Marcus is liable for the unpaid employer portion of CPP and EI because he signed the contract.

1′. Elena provides home daycare services in her own residence. She sets her own operating hours and fee schedule, purchases all toys and food at her own expense, bears the financial loss if enrollment drops, and serves six different families independently. How will the CRA most likely classify Elena under RC4110?

Elena 在自己家里提供家庭日托服务。她自行决定作息时间与收费标准，自费购买所有玩具和餐饮食材，若招不满孩子则自己承担亏损风险，并独立为六个不同家庭提供服务。根据 RC4110 指南，CRA 最可能如何认定 Elena 的身份？

a. As an employee of the six families, because residential childcare is automatically deemed employment by occupation name.

b. As operating a personal service business, which prohibits her from deducting any food or toy supplies.

c. As self-employed, because she controls the work, supplies her own space and materials, and bears the chance of profit and risk of loss.

d. As self-employed only if each parent signs a notarized waiver of employer CPP and EI obligations before the tax year ends.

2. Clara operates a sole proprietorship providing residential landscaping services (she is not a farmer, fisher, or self-employed commission sales agent). In December 2026, she completes a $4,000 landscaping job and invoices the client, who pays her on January 18, 2027. She also receives a $600 repair bill in December 2026 for her lawn equipment and pays it in January 2027. How must Clara report these items for the 2026 tax year?

Clara 经营一家独资园林绿化服务部（她不是农民、渔民或按佣金计酬的销售代理人）。2026 年 12 月，她完成了一单 $4,000 的绿化工程并向客户开具账单，客户于 2027 年 1 月 18 日付款。她还在 2026 年 12 月收到一张 $600 的草坪设备维修账单，并于 2027 年 1 月付款。Clara 在 2026 税年必须如何申报这两项收支?

a. She may elect to use the cash method on Form T2125 and report both the $4,000 revenue and the $600 expense in the 2027 tax year.
b. She must use the accrual method, including the $4,000 earned revenue and deducting the $600 incurred repair expense in the 2026 tax year.
c. She must include the $4,000 revenue in 2026 under the accrual method, but she cannot deduct the $600 repair expense until cash is paid in 2027.
d. She can file Form T1139 to shift her fiscal period end to January 31, 2027, so that the cash receipts match the invoice dates without CRA approval.

2′. Gavin is a self-employed grain farmer who properly reported his farm income using the cash method in 2025. In 2026, he wants to switch to the accrual method, and another farmer friend who still uses the cash method prepays a three-year supply contract covering 2026, 2027, and 2028. Under section 28 of the Income Tax Act, which statement is correct?

Gavin 是一名自雇谷物种植农，2025 年合规使用现金制申报农业收入。2026 年他想改用权责发生制；而他另一位仍使用现金制的农民朋友一次性预付了涵盖 2026、2027 和 2028 三年的农资合同款。根据《所得税法》第 28 条，下列哪项陈述正确?

a. Gavin needs CRA concurrence to leave the cash method, and a cash-method farmer cannot fully deduct in the year paid a prepayment covering two or more later years.
b. Gavin needs CRA approval to first enter the cash method, but he can switch back to the accrual method at any time simply by checking a box on his return.
c. Both farmers must use the accrual method starting in 2026 because the cash method now applies only to commissioned sales agents.
d. A cash-method farmer can deduct 100% of a five-year prepaid expense in the year of payment because cash accounting has no anti-distortion rules.

3. Nadia is considering starting a boutique consulting business. In February 2026, while still deciding whether to launch, she spends $1,200 on exploratory market research seminars. On May 1, 2026, she signs her first client contract, leases an office desk for $3,000 for the rest of the year, and spends $800 (all considered reasonable) taking clients out for business meals. How much can Nadia deduct as current operating expenses on Form T2125 for 2026?

Nadia 正在考虑开办一家精品咨询业务。2026 年 2 月，当她还在犹豫要不要创业时，花了 $1,200 参加探索性市场调研讲座。2026 年 5 月 1 日，她签下第一份客户合同，以 $3,000 租下当年剩余月份的办公工位，并花了 $800（全额属于合理范围）请客户吃商务餐饮。Nadia 在 2026 年 Form T2125 上可以扣除多少当期营业费用?

a. $5,000, because all expenditures were incurred in the same calendar year that the business began generating revenue.
b. $4,600, consisting of the $1,200 exploratory seminars, the $3,000 desk lease, and 50% of the $800 client meals.
c. $3,400, consisting of the $3,000 desk lease incurred after the business commenced plus 50% ($400) of the reasonable client meals.
d. $3,800, consisting of the $3,000 desk lease and 100% of the $800 client meals because the meal amount already passed the section 67 reasonableness test.

3′. Victor is a self-employed long-haul truck driver who incurs $2,000 in eligible meal expenses during eligible travel periods in 2026. Of that $2,000, the CRA determines that $200 was excessive and unreasonable under section 67, leaving $1,800 as the reasonable amount. He also pays $1,500 in legal fees to defend against a personal criminal charge unrelated to his trucking business. What total deduction can Victor claim for these two items?

Victor 是一名自雇长途货车司机，2026 年在合资格出车期间发生了 $2,000 的餐饮支出。CRA 根据第 67 条认定其中 $200 超出合理范围，合理金额为 $1,800。此外他还支付了 $1,500 律师费，用于抗辩一项与货运业务无关的个人刑事指控。Victor 就这两项支出共可扣除多少?

a. $900, calculated as 50% of the $1,800 reasonable meal expenses, with $0 for the personal legal fees.
b. $1,440, calculated as 80% of the $1,800 reasonable meal amount for a long-haul truck driver, and $0 for the personal criminal defence legal fees.
c. $1,600, calculated as 80% of the full $2,000 actual meal receipts regardless of reasonableness.
d. $2,940, consisting of $1,440 for meals plus $1,500 for the legal fees because losing his personal liberty would stop him from driving.

4. In 2026, a sole proprietor earns $52,000 in net business income (below the 2026 YMPE of $74,600) and calculates $5,771.50 in total self-employed CPP contributions on Schedule 8. How is this CPP amount reported on the proprietor's T1 return, and why?

2026 年，一名独资经营者取得 $52,000 营业净利润（低于 2026 年 YMPE $74,600），在 Schedule 8 上算出自雇 CPP 供款总额为 $5,771.50。这笔 CPP 金额在他的 T1 报税表上如何申报？为什么？

a. The entire $5,771.50 is claimed as a business expense on Form T2125 Part 4, because a self-employed person acts as their own employer and pays it to earn income.
b. The entire $5,771.50 goes on Line 31000 as a non-refundable credit at the lowest bracket rate, since every CPP amount an individual pays counts as an employee contribution.
c. Schedule 8 splits it: the employee-equivalent base half goes to Line 31000 as a credit; the employer-equivalent base half plus enhanced parts go to Line 22200 as a deduction.
d. It is split via Schedule 13: half is added to tax payable on Line 42120 and the other half is claimed as a credit on Line 31217, as with voluntary EI premiums.

4′. Hannah is a 67-year-old self-employed consultant who is already receiving a CPP retirement pension and has no employment income. She wants to stop making CPP contributions on her self-employed earnings starting in July 2026. How does she make this election?

Hannah 是一名 67 岁的自雇顾问，已经在领取 CPP 退休金且没有任何雇佣收入。她想从 2026 年 7 月起停止就其自雇收入缴纳 CPP 供款。她该如何做出这项选择？

a. She must give Form CPT30 to each of her clients before July 2026, otherwise she cannot stop contributing on her self-employed earnings for 2026.
b. She cannot stop contributing until she turns 70 because self-employed CPP contributions are mandatory at all ages once net income exceeds $3,500.
c. She must pay the full year's CPP upfront and file Form T1139 the following year to request a refund of the employer half.
d. She enters the month her contributions stop directly on Schedule 8 when filing her 2026 return, as long as the return is filed by the filing deadline.

5. Liam is a full-time salaried employee whose spouse operates a sole proprietorship in British Columbia. Liam has a net tax owing of $4,200 for the 2026 tax year (and also owed $3,800 in 2025). He files his 2026 T1 return and pays his $4,200 balance on June 10, 2027. Which of the following statements accurately describes Liam's filing, interest, and instalment status?

Liam 是一名全职领薪雇员，其配偶在 BC 省经营一家独资企业。Liam 在 2026 税年有 $4,200 的净欠税额（且 2025 年也曾净欠税 $3,800）。他在 2027 年 6 月 10 日提交了 2026 年 T1 报税表并付清了 $4,200 欠税。下列哪项陈述准确描述了 Liam 的申报、利息及分期预缴状态?

a. Filed on time with no late-filing penalty since his spouse is self-employed, but interest runs on the $4,200 from May 1, 2027, and his owing in both years is above the $3,000 instalment threshold.

b. Neither interest nor a late-filing penalty applies because both the filing deadline and the payment deadline are extended to June 15 for spouses of self-employed individuals.

c. He faces both a late-filing penalty and interest from May 1, 2027, because the June 15 filing extension applies only to the spouse who personally runs the business, not to a salaried spouse.

d. His return is on time and interest starts May 1, 2027, but he only needs to make a single annual instalment payment on December 31 because his spouse operates in British Columbia.

5′. Owen is a self-employed IT consultant in Vancouver (not a farmer or fisher) whose net tax owing was $4,500 in 2025 and is projected to be $5,000 in 2026. What are the required instalment payment due dates for Owen during the 2026 tax year?

Owen 是温哥华一名自雇 IT 顾问（非农民或渔民），其 2025 年净欠税额为 $4,500，预计 2026 年净欠税额为 $5,000。Owen 在 2026 税年期间的分期预缴固定到期日是什么时候?

a. April 30, 2026, and June 15, 2026, matching the individual payment and filing deadlines.

b. March 15, June 15, September 15, and December 15.

c. December 31, 2026, as a single lump-sum instalment payment.

d. No instalments are required in 2026 because the federal threshold for self-employed professionals is $6,000 of net tax owing.

6. In 2026, Priya incurs a net business loss of $45,000 from her sole proprietorship. In the same year, she has $18,000 of employment income and no other income sources. After offsetting her 2026 employment income, how is the remaining $27,000 loss classified and what are its carryback and carryforward rules?

2026 年，Priya 的独资企业发生了 $45,000 的营业净亏损。同年她有 $18,000 的雇佣收入，无其他收入来源。在抵消掉她 2026 年的雇佣收入后，剩余的 $27,000 亏损如何归类？其回抵与结转规则是什么？

a. It becomes a net capital loss that can be carried back 3 years and carried forward indefinitely, but only against taxable capital gains.

b. It cannot offset the $18,000 employment income in 2026; the full $45,000 must be carried forward up to 20 years strictly against future business income from the same sole proprietorship.

c. It becomes a non-capital loss that can be carried back 3 tax years or carried forward up to 7 tax years against business income only.

d. It becomes a non-capital loss that can be carried back 3 tax years or carried forward up to 20 tax years to offset income from any source.

6′. Kevin has an unused net capital loss from selling shares in 2024 and a current-year business profit of $60,000 reported on Form T2125 in 2026. He has no capital gains in 2026. Can Kevin use his 2024 net capital loss to reduce his 2026 self-employed business income?

Kevin 有一笔 2024 年出售股票留下的未用净资本亏损，而 2026 年他在 Form T2125 上申报了 $60,000 的当年营业利润，当年没有任何资本利得。Kevin 能否用 2024 年的净资本亏损来抵减 2026 年的自雇营业收入？

a. No, because net capital losses can only offset capital gains and cannot be mixed with or used to offset business income.

b. Yes, up to 50% of the net capital loss can be converted into a non-capital loss after two years.

c. Yes, provided he files Form T2125 Part 5 to claim the loss as a partner adjustment.

d. No, because capital losses expire after 3 tax years if they are not used against employment or business income in that period.

7. Dr. Lin is a self-employed dentist in Vancouver. At her December 31, 2026 fiscal year-end, she has completed stage-one dental procedures for several patients that have not yet been billed; the cost of her time and materials for this work-in-progress (WIP) is $9,000, and its fair market value is $14,000. Her bookkeeper finds a 2016 tax return showing a section 34 election to exclude WIP. How must Dr. Lin report her income and WIP on her 2026 Form T2125?

Lin 医生是温哥华一名自雇牙医。在 2026 年 12 月 31 日财年末，她已为数名患者完成第一阶段牙科治疗但尚未开票；这批在制品（WIP）的时间与材料成本为 $9,000，公允市价为 $14,000。她的记账员翻出一份 2016 年的旧报税单，上面显示曾用第 34 条选举排除 WIP。Lin 医生在 2026 年 Form T2125 上必须如何申报其收入与 WIP?

a. She reports professional income in Part 3B and may exclude 100% of the WIP in 2026 under the section 34 billed-basis election because dentists are designated professionals.
b. She reports Part 3B professional income and includes the year-end WIP at $9,000 (lower of cost and fair market value), since the section 34 election and its transition have ended.
c. She reports business income in Part 3A and must include the year-end WIP at its full fair market value of $14,000, since dental work is not a profession.
d. She reports professional income in Part 3B and must include only 20% of the WIP ($1,800) in 2026 under the five-year transitional bring-back rule for former electors.

7′. Tariq earns income from two separate unincorporated activities in 2026: he works as an independent IT architecture consultant (a profession involving specialized knowledge) and he also runs an online retail store selling computer accessories with year-end merchandise inventory. How must Tariq complete Form T2125 for 2026?

Tariq 在 2026 年从两项独立的未注册公司活动中取得收入：他担任独立 IT 架构顾问（一项蕴含专门知识的职业），同时还经营一家销售电脑配件且期末有商品存货的网店。Tariq 在 2026 年必须如何填报 Form T2125?

a. He combines both activities onto a single Form T2125 under Part 3A because IT consulting is not one of the six traditional designated professions.
b. He files one Form T2125 using Part 3B for both activities and values the retail computer accessories as unbilled work-in-progress.
c. He completes two T2125 forms: Part 3A for the store, with closing inventory, and Part 3B for the consulting, with WIP at the lower of cost and fair market value.
d. He reports the retail store on Form T2125 Part 3A and reports the IT consulting directly on Line 10400 as employment income because IT consultants cannot use Part 3B.

第 2 章 · 家庭办公、车辆与 CCA / Business-Use-of-Home, Vehicle Expenses & CCA 自雇与小生意 / Self-employment and small business

带 ′ 的是同一考点的变式题：主题题做错时再做它。

8. Maya is a self-employed Speech therapist who rents a treatment room at a commercial clinic where she conducts all in-person patient sessions. Each evening, she spends six to eight hours in a spare room at home updating patient charts, billing, and holding video consultations with parents. Can Maya deduct business-use-of-home expenses on Form T2125?

Maya 是一名自雇语言治疗师，在一家商业诊所租用治疗室进行所有面对面患者诊疗。每天晚上，她在家中的备用房间花六到八小时更新病历、处理账单并与家长进行视频咨询。Maya 能否在 T2125 表上申报家庭办公室支出?

a. No, because the rented clinic room is her principal place of business and video consultations do not count as meeting clients in person at home.

b. Yes, because spending six to eight hours every evening on charts and billing in that room proves substantial and regular business use of her home.

c. Yes, because holding regular video consultations with parents in a spare room satisfies the gateway test for meeting clients at home.

d. No, unless she elects the temporary flat-rate method based on the number of days she worked from home.

8′. Liam is a self-employed business coach who has no outside office and performs all his research, preparation, and client coaching from a dedicated home study using video calls. He never meets clients face to face at home. Is Liam eligible to claim business-use-of-home expenses?

Liam 是一名自雇商业教练，没有外部办公室，所有研究、备课与客户辅导均在家中一间专用书房通过视频通话完成，从不在家面对面见客户。Liam 是否有资格申报家庭办公室支出?

a. No, because conducting coaching sessions by video call automatically disqualifies any home office claim.

b. No, because a taxpayer must satisfy both the principal place of business test and the in-person client meeting test simultaneously.

c. Yes, because his home study is his principal place of business, which satisfies the first gateway test without needing in-person client meetings.

d. Yes, but only for utilities and internet, because self-employed individuals cannot deduct mortgage interest or property tax.

9. Noah operates a sole proprietorship solely from a dedicated room in his home. Before claiming business-use-of-home expenses, his 2026 business net income on Form T2125 is $2,400. His prorated home office share of utilities, home insurance, property tax, and mortgage interest totals $3,100, and he also made regular mortgage principal repayments during the year. How should Noah report his 2026 business-use-of-home deduction?

Noah 完全在家中一间专用房间经营独资企业。在申报家庭办公室支出前，他 2026 年 T2125 表上的经营净收入为 $2,400。按比例分摊后的水电暖、房屋保险、物业税和按揭利息合计 $3,100，且他在年内还定期偿还了按揭本金。Noah 应如何申报 2026 年的家庭办公室扣除?

a. Deduct both the $3,100 pool and the prorated share of mortgage principal repayments in 2026, even though this creates a business loss for the year.
b. Leave out the principal, deduct $2,400 of the $3,100 to bring net income to $0, and carry the other $700 forward to later years of the same business.
c. Deduct the full $3,100 in 2026 to create a $700 business loss that offsets other income, while leaving out the mortgage principal repayments.
d. Exclude both mortgage interest and mortgage principal, because neither is deductible on a self-employed return; deduct only the other costs.

9′. Chloe is a self-employed bookkeeper whose sole office is a shared dining table used partly for business and partly for family meals. Which rule governs how she calculates and claims her home expenses on Form T2125?

Chloe 是一名自雇簿记员，唯一办公地点是家中一张兼作家庭用餐的餐桌。在 T2125 表上计算并申报房屋支出时适用哪条规则?

a. She prorates eligible expenses (including mortgage interest and property tax) first by the area ratio and then by the business-use time ratio, and cannot use them to create a business loss.
b. Because the dining table is not used exclusively for business, she is completely barred from claiming any home office expenses even though her home is her principal place of business.
c. She may deduct the full cost of renovating the kitchen and replacing all house windows as current home office expenses.
d. She can prorate only by floor area without adjusting for personal dining hours, and any excess over net income can be applied against employment income from another employer.

10. Victor is a self-employed surveyor who kept a full calendar-year logbook in his first year of business. In 2026, he wants to use the simplified logbook method and also claim vehicle expenses, equipment CCA, and home office expenses on Form T2125. Which procedure complies with CRA requirements?

Victor 是一名自雇测量师，在开业第一年记满了一整个自然年的行车日志。2026 年，他想使用简化日志法，并在 T2125 表上同时申报车辆费用、设备 CCA 和家庭办公室支出。哪项做法符合 CRA 要求?

a. Keep a one-month sample logbook that stays within 20% of the base-year percentage, and deduct home office expenses before any vehicle expenses.

b. Skip the logbook entirely in 2026, deduct vehicle loan interest without any monthly cap, and keep the receipts for three years after filing.

c. Keep a continuous three-month sample within 10% of the base year, keep records six years, and claim vehicle costs and CCA before home office expenses in Part 7.

d. Treat daily drives from home to his regular rented surveying office as business kilometres, and deduct that share on Line 9945 with home costs.

10′. After establishing a base-year vehicle logbook two years ago, a self-employed contractor relocated her business premises and shifted to a completely different client territory in 2026. How does this affect her vehicle expense documentation and interest deduction?

一名自雇承包商两年前确立了基准年行车日志，但在 2026 年搬迁了营业场所并转向完全不同的客户区域。这对她的车辆费用凭证与利息扣除有何影响?

a. She can still rely on the old base-year percentage forever, and her vehicle loan interest is prorated before applying the federal monthly limit.

b. Her driving pattern changed materially, so she needs a new full-year logbook, and her loan interest is first capped at the monthly limit and then prorated.

c. She may use a flat unverified estimate for 2026 mileage because the CRA is required to accept post-filing estimates when an office moves.

d. She only needs to keep her vehicle logbook and purchase invoices for one year after filing the 2026 return.

11. Elena, a self-employed architect, sells her luxury passenger vehicle in 2026. The vehicle had been placed in its own separate Class 10.1 pool when purchased in a prior year and remained in Class 10.1 at the end of 2025. When she disposes of this Class 10.1 vehicle in 2026, what is the tax treatment?

自雇建筑师 Elena 在 2026 年卖掉了她的豪华乘用车。该车在往年购入时已单独归入一个 Class 10.1 类别，且在 2025 年年末仍在 Class 10.1 中。当她在 2026 年处置这辆 Class 10.1 车辆时，税务处理是什么？

a. She must calculate recapture if the sale proceeds exceed UCC, or claim a terminal loss if proceeds are less than UCC, and can claim no CCA in 2026.
b. No recapture and no terminal loss arise, and since the car was in Class 10.1 at the end of 2025, she may claim half the normal CCA in 2026.
c. She pools the sale proceeds with her other business trucks in Class 10 to reduce the combined undepreciated capital cost.
d. She may deduct any shortfall between the original purchase price and the sale price as a capital loss against business income.

11′. In 2026, a self-employed GST-registered consultant purchases a non-zero-emission passenger vehicle for $132,000 before taxes for business use. How is the capital cost base for CCA determined in 2026?

2026 年，一名已注册 GST 的自雇顾问以税前 $132,000 购入一辆非零排放乘用车用于经营。2026 年该如何确定其用于计算 CCA 的资本成本基础?

a. It goes into its own Class 10.1 at $39,000 plus the GST and PST computed on that $39,000, less any GST recovered as an input tax credit.
b. The full $132,000 purchase price goes into Class 10 and is depreciated at 30%, because the car is used to earn business income.
c. The vehicle enters Class 54 because all passenger vehicles costing over $100,000 qualify for the higher Class 54 ceiling.
d. It goes into Class 10.1 at a flat $39,000, and no sales tax of any kind may ever be added on top of that capped amount.

12. In 2026, a self-employed carpenter purchases a hand power tool costing under $500, a heavy workshop cabinet costing over $500, and pays for leasehold improvements to his rented workshop. How should these three capital additions be classified for CCA purposes?

2026 年，一名自雇木匠购买了一件成本低于 $500 的手持电动工具、一个成本高于 $500 的重型车间工具柜，并为租用的车间支付了租用场地资本性改良费用。这三项新增资本财产应如何进行 CCA 分类?

a. Both the tool under $500 and the cabinet over $500 go into Class 8, while leasehold improvements go into Class 12.
b. The tool under $500 goes into Class 12 but is reduced by the half-year rule, the cabinet goes into Class 50, and leasehold improvements go into Class 8.
c. All three items must be pooled into a single CCA class so that the carpenter can claim a higher depreciation rate on the cabinet than on the tool.
d. Class 12 for the tool (100%, no half-year rule), Class 8 for the cabinet, and Class 13 for the leasehold improvements, written off straight-line over the lease.

12′. A small business disposes of the last remaining piece of equipment in its Class 8 pool during 2026. At year-end, no assets remain in Class 8, but there is still a positive undepreciated capital cost (UCC) balance left in the pool. How is this remaining balance treated?

一家小企业在 2026 年处置了其 Class 8 类别中仅存的最后一件设备。到年末时，Class 8 中已无任何财产，但类别里仍有一笔正数的未折旧资本成本余额（UCC）。这笔剩余余额如何处理?

a. It must be added back to business income as recapture.
b. It is deducted in full as a terminal loss, which can be used to offset income from any source.
c. It is treated as a capital loss that can only offset taxable capital gains.
d. It is forfeited under s.20(16.1) because terminal losses are disallowed for all CCA classes.

13. In March 2026, a self-employed electrical contractor in British Columbia buys a passenger pickup truck priced at $132,000 (before taxes) from a GST-registered dealer for business use. What are the federal Select Luxury Items Tax and the BC Provincial Sales Tax (PST) payable on this purchase?

2026 年 3 月，BC 省一名自雇电力承包商从一家 GST 注册经销商处购入一辆税前价格为 $132,000 的乘用皮卡车用于经营。这笔购车交易应缴纳的联邦精选豪华品税（Select Luxury Items Tax）和 BC 省销售税（PST）分别是多少?

a. Federal luxury tax of $6,400 and BC PST of $19,800 (at the 15% tier for $125,000 to under $150,000).
b. Federal luxury tax of $0 (repealed in 2025) and BC PST of $19,800.
c. Federal luxury tax of $13,200 (10% of total price) and BC PST calculated at the basic 7% tier.
d. Only the higher of the federal luxury tax or BC PST applies, because the two taxes offset each other on commercial vehicles.

13′. A BC business owner is comparing the provincial PST tiers on passenger vehicles purchased from a GST-registered dealer in 2026. Which statement correctly describes the BC PST rate thresholds and the federal luxury tax scope in 2026?

一名 BC 省企业主正在对比 2026 年从 GST 注册经销商处购买乘用车的省级 PST 分档税率。哪项陈述正确描述了 2026 年的 BC PST 税率分界及联邦豪华税适用范围?

a. Ordinary passenger vehicles under $55,000 are taxed at 12%, while vehicles of $150,000 and over are taxed at 10%.

b. ZEVs use the same $55,000, $56,000 and $57,000 starting points as gas cars, and the luxury tax still covers aircraft and vessels in 2026.

c. Dealer sales of ordinary cars start at 7% under $55,000 and reach 20% at $150,000, and the vehicle luxury tax still applies above $100,000.

d. The federal Select Luxury Items Tax on vehicles is 20% of the entire purchase price once the price exceeds $100,000.

14. In 2026, a proprietor acquires three new capital assets that become available for use before 2027: general computer hardware (Class 50), manufacturing machinery, and a new manufacturing building. Given the 2026 legislative status (Bill C-15 enacted, Bill C-31 not yet enacted), how do the first-year CCA rules apply?

2026 年，一名业主购置了三项在 2027 年前可供使用的新资本资产：一般计算机硬件（Class 50）、制造加工机器设备，以及一栋新建制造加工建筑。按 2026 年的立法状态（Bill C-15 已御准、Bill C-31 尚未立法），首年 CCA 规则如何适用?

a. All three assets—including the manufacturing building—receive enacted 100% immediate expensing in 2026, and the machinery enters Class 53.

b. None of the assets qualify for enhanced first-year depreciation because the Accelerated Investment Incentive was permanently phased out before 2026.

c. Class 50 hardware gets the enacted first-year write-off, the machinery goes to Class 43 with the RIIP enhancement, and the building's expensing is not yet law.

d. The manufacturing building receives enacted 100% expensing under Bill C-15, whereas Class 50 computer hardware is still awaiting royal assent in Bill C-31.

14′. A small manufacturer buys new processing equipment in 2026 and wants to know why she cannot put it into Class 53 or simply multiply by a flat 30% half-year rule without checking acquisition dates. Which explanation is accurate for the 2026 tax year?

一名小型制造商在 2026 年购入新的加工设备，想了解为什么不能将其归入 Class 53，也不能在不核对取得日期的情况下简单按 30% 半年规则计算。就 2026 税年而言，哪项解释是准确的?

a. Class 53 took only 2016—2025 acquisitions; 2026 machinery goes to Class 43 at 30%, and the restored RIIP first-year rule must be checked by acquisition and use dates.

b. Class 53 is still open in 2026, and the taxpayer is required by law to claim the maximum possible CCA every year.

c. New manufacturing machinery acquired in 2026 must be placed in Class 13 and depreciated straight-line over the building lease.

d. She can place two machines in Class 43 and claim the full enhanced rate on one machine while claiming 0% on the other machine within the same class pool.

第 3 章 · GST/HST 注册与快速法 / GST/HST: Registration, ITCs and the Quick Method 自雇与小生意 / Self-employment and small business

带 ′ 的是同一考点的变式题：主题题做错时再做它。

15. Elena operates two activities in Vancouver: she exports custom software solely to foreign clients ($85,000 in 2026) and rents out a residential condo on a long-term lease ($28,000 in 2026). How do the GST/HST registration and input tax credit (ITC) rules apply to her two activities?

Elena在温哥华经营两项业务：专门向境外客户出口定制软件（2026年收入$85,000），以及长租一套住宅公寓（2026年租金$28,000）。GST/HST注册与进项税额抵免（ITC）规则如何适用于她的这两项业务?

a. Neither activity collects GST from customers, so both are exempt supplies and Elena cannot register or claim any ITCs.

b. Both activities are included in the $30,000 threshold, and once registered, Elena can claim ITCs on expenses for both the software export and the residential rental.

c. The export is a zero-rated supply that counts toward the $30,000 threshold and earns full ITCs, while the long-term residential rental is exempt with no ITCs.

d. The software export is an exempt supply and the residential rental is a zero-rated supply, so only the condo expenses qualify for ITCs.

15′. Marcus runs a neighbourhood pharmacy in Victoria that sells prescription drugs and basic groceries, along with a licensed daycare centre in the adjacent unit. Which statement correctly describes his eligibility to claim input tax credits (ITCs)?

Marcus在维多利亚经营一家销售处方药和基本食品杂货的社区药房，并在隔壁单元经营一家持牌托儿中心。下列哪项准确描述了他申报进项税额抵免（ITC）的资格?

a. Prescription drugs and basic groceries are zero-rated, so their inputs earn ITCs, while daycare is an exempt supply that earns no ITCs.

b. Because neither prescription drugs nor daycare services charge GST at the counter, neither activity qualifies for any ITCs.

c. Daycare services are zero-rated supplies that generate full ITC refunds, whereas prescription drugs are exempt supplies.

d. Once Marcus registers for GST/HST through his pharmacy, he can also claim 100% of the GST paid on toys and supplies used exclusively in the daycare.

16. Kevin is an unregistered sole proprietor in Burnaby who does freelance copywriting and weekend event photography. In Q1 and Q2 of 2026, his combined revenues were $6,000 per quarter. In Q3 (July to September 2026), copywriting brings in $19,000 and photography brings in $15,000, with the invoice that pushed his Q3 combined total past $30,000 issued on September 12, 2026. When does Kevin cease to be a small supplier, and what must he do?

Kevin是本拿比一名未注册的个体经营者，兼做自由文案撰稿与周末活动摄影。2026年第1和第2季度，他两项业务合计收入均为每季$6,000。在第3季度（2026年7月至9月），文案收入$19,000、摄影收入$15,000，其中使第3季度合计突破$30,000的那张发票开具于2026年9月12日。Kevin何时失去小供应商身份？他必须怎么做？

a. He remains a small supplier because neither copywriting ($19,000) nor photography ($15,000) exceeded $30,000 on its own in Q3.

b. He ceases to be a small supplier on September 12, 2026, must charge GST on the invoice that crossed $30,000, and must register within 29 days.

c. He ceases to be a small supplier on October 31, 2026, and begins charging GST on his first supply in November 2026.

d. He ceases to be a small supplier on October 1, 2026, and does not need to charge GST on the September 12 invoice.

16′. Nadia is an unregistered consultant in Kelowna. Her quarterly taxable revenues are $8,000 in Q1, $9,000 in Q2, $8,500 in Q3, and $7,000 in Q4 (ending December 31, 2026), bringing her four-quarter cumulative total to $32,500 without any single quarter exceeding $30,000. When must Nadia start charging GST?

Nadia是基洛纳一名未注册的顾问。她四个季度的应税收入分别为：第1季$8,000、第2季$9,000、第3季$8,500、第4季（截至2026年12月31日）$7,000，连续四季累计达$32,500，但没有任何单季超过$30,000。Nadia必须从何时起开始收取GST？

a. On the exact date in Q4 when her cumulative four-quarter revenue crossed $30,000, with no buffer period.

b. On January 1, 2027, which is the very first day after the calendar quarter in which she exceeded the threshold.

c. She remains exempt from registration as long as fewer than 30 sales were made through a digital platform during the year.

d. On her first taxable supply made after January 31, 2027, with registration completed within 29 days of that effective date.

17. A GST/HST registrant in Surrey is preparing its Q2 2026 return and evaluating the simplified method for claiming ITCs. It holds two tax-included receipts: an $85 restaurant supply receipt (showing only vendor name, date, and total paid) and a $620 printer invoice (showing vendor name, date, total paid, GST amount, and vendor registration number, but omitting the buyer's name and payment terms). Which receipt supports a valid ITC under 2026 rules, and what are the dual thresholds for the simplified ITC method?

素里一名GST/HST登记人正在准备2026年第2季度报表，并评估是否采用简化进项法。手头有两张含税票据：一张$85的耗材小票（仅印有卖家名称、日期和实付总额）和一张$620的打印机发票（印有卖家名称、日期、总额、GST税额和卖家登记号，但未写买方名称和付款条件）。按2026年规则，哪张票据能合规支持ITC？简化进项法的双重门槛是多少？

a. Only the $85 receipt; the simplified method needs prior-year worldwide taxable sales of $1,000,000 or less and Canadian taxable purchases of $4,000,000 or less.

b. Neither receipt is valid because any receipt over $30 requires a GST registration number and any invoice over $150 requires the buyer's name.

c. Both receipts are valid; the simplified ITC method requires taxable sales of $400,000 or less and waives the need to keep invoices.

d. Only the $620 invoice is valid; the simplified ITC method requires prior-year taxable sales of $1,500,000 or less and purchases of $6,000,000 or less.

17′. While closing her 2026 books, a regular-method registrant (whose annual sales have always been under $300,000) discovers an unclaimed $540 equipment invoice from May 2024 that lists all required high-tier details. How should she claim this missed ITC, and what is the statutory time limit?

在结平2026年账目时，一名采用常规法的登记人（年销售额始终低于$300,000）发现一张2024年5月漏抵的$540设备发票，票面已具备高档凭证所需的全部要素。她应如何补抵这笔漏掉的ITC？法定时效是多久？

a. She must forfeit the ITC, because unclaimed input tax credits expire at the end of the fiscal year in which the expense was incurred.

b. She must file an amended 2024 GST34 return because missed ITCs cannot be added to a later period's Line 106.

c. She can include the unclaimed ITC directly on Line 106 of her current 2026 return, as general registrants have a 4-year time limit to claim ITCs.

d. She cannot claim it in 2026 because the ITC time limit for all registrants is strictly 2 years.

18. Clara is an IT consultant in Vancouver (permanent establishment and all clients in BC) who validly elected the quick method before 2026. In 2026, her pre-tax consulting revenue is $100,000 plus $5,000 GST collected. She paid $600 GST on routine software subscriptions and bought a new work laptop for $2,000 plus $100 GST and $140 BC PST. What amounts should Clara report on Line 101 and Line 109 (net tax) of her 2026 Form GST34?

Clara是温哥华一名IT顾问（常设机构与全部客户均在卑诗省），在2026年前已有效选举采用快速法。2026年她的不含税咨询收入为$100,000，另收$5,000 GST。她全年支付日常软件订阅GST $600，并购置一台新工作笔记本电脑，价款$2,000另加$100 GST和$140卑诗省PST。Clara在2026年GST34表的第101行与第109行（净税）应分别填报多少?

a. Line 101: $100,000; Line 109: $3,200.

b. Line 101: $105,000; Line 109: $2,780.

c. Line 101: $105,000; Line 109: $3,240.

d. Line 101: $105,000; Line 109: $3,380.

18′. Which of the following self-employed professionals in British Columbia (each having $220,000 in tax-included annual revenue and operating continuously for 3 years) is ELIGIBLE to elect the GST/HST quick method?

下列哪一位在卑诗省执业的自雇专业人士（含税年收入均为$220,000且已连续经营满3年）有资格选举采用GST/HST快速法?

a. A self-employed bookkeeper and tax-return preparer serving small businesses.

b. A freelance graphic and web designer serving corporate clients.

c. An independent legal counsel practicing contract law.

d. An actuarial consultant providing pension valuations.

19. In 2026, a Vancouver freelance writer using the quick method collects $6,000 GST on $120,000 of pre-tax revenue. On Form GST34, her quick-method remittance on Line 103 is $4,536 ($126,000 × 3.6%), reduced by the $300 1% credit on Line 107, for net tax remitted of $4,236. She also paid $18,900 (consisting of $18,000 pre-tax plus $900 GST) for deductible operating expenses. How does using the quick method instead of the regular method affect her net taxable business income on Form T2125?

2026年，温哥华一名使用快速法的自由撰稿人在$120,000不含税收入上收取了$6,000 GST。在GST34表上，她第103行的快速法应缴额为$4,536（$126,000 × 3.6%），减去第107行的$300（1%抵免），实缴净税$4,236。她全年支付可扣除的日常经营开销含税共$18,900（$18,000不含税额加$900 GST）。与常规法相比，采用快速法如何影响她在T2125表上的净应税经营收入？

a. Her T2125 net income increases by $864, because she adds $1,464 in unremitted GST and $300 in government assistance, while deducting $900 more in tax-included expenses.
b. Her T2125 net income is unchanged, because GST/HST is a consumption tax that never enters income tax calculations.
c. Her T2125 net income increases by $1,764, because she must add the $1,464 differential plus the $300 credit, while still deducting operating expenses at their $18,000 pre-tax amount.
d. Her T2125 net income decreases by $900, because only the unrecovered GST on expenses is adjusted on Form T2125.

19′. An Ontario management consultant (13% HST; quick-method service remittance rate 8.8%) has $100,000 in pre-tax revenue ($113,000 including HST) and $20,000 in pre-tax taxable operating expenses in 2026. Based on the chapter's break-even rule of thumb (roughly 23.5%–24.4% of revenue), which method produces a lower GST/HST bill before the 1% credit?

安大略省一名管理顾问（13% HST；快速法服务类汇款率8.8%）2026年不含税收入为$100,000（含HST为$113,000），不含税应税日常经营开销为$20,000。根据本章的临界点经验法则（应税采购约占营业额的23.5%–24.4%），在计入1%抵免前，哪种方法算出的应缴GST/HST更低？

a. The regular method is lower, at $9,944, compared with $10,400 payable under the quick method for the same year.
b. Both methods result in the exact same $10,400 remittance because 8.8% of $113,000 equals $10,400.
c. The quick method, at $9,944 versus $10,400, because her purchases are 20% of revenue, below the roughly 23.5% break-even.
d. The regular method is always lower in HST provinces, because the HST rate there is higher than the 5% GST rate.

20. Sam begins driving part-time for a commercial ridesharing platform in Surrey, BC in 2026, earning $21,000 in passenger fares for the year. His expenses include $3,150 in fuel (GST included), $1,050 in platform service fees plus $52.50 GST, $1,800 in auto insurance, and $900 in car-loan interest. How do the GST/HST rules apply to Sam under the regular method?

Sam于2026年在卑诗省素里开始兼职跑商业网约车，全年乘客车费收入为$21,000。他的开销包括：燃油$3,150（含GST）、平台服务费$1,050另加$52.50 GST、汽车保险$1,800以及车贷利息$900。在常规法下，GST/HST规则如何适用于Sam?

a. Sam does not need to register because his $21,000 revenue is below the $30,000 small supplier threshold.
b. Sam must register from day one; his GST collected is $1,050 ($21,000 × 5%), and his ITCs include 5/105 of fuel, insurance, and loan interest.
c. He registers from day one; output tax is $1,000 ($21,000 × 5/105) and ITCs are $202.50 (fuel $150 plus fee GST $52.50), none on insurance or interest.
d. Sam must register only if he completes at least 30 trips and exceeds $2,800 on the platform, and platform fees never carry claimable GST.

20′. A registered graphic designer in Victoria, BC buys a computer workstation for her studio for $3,000, paying $150 in federal GST (5%) and $210 in BC PST (7%). She also works part-time delivering restaurant meals by bicycle ($9,000 annual income, her only other activity, with total combined revenues of $26,000 before voluntary registration). How should the $150 GST and $210 PST be treated, and did the meal delivery alone require day-one registration?

卑诗省维多利亚一名已注册的平面设计师为工作室购置一台$3,000的电脑工作站，支付了$150联邦GST（5%）与$210卑诗省PST（7%）。她还兼职骑车送餐（年收入$9,000，自愿注册前两项业务合计$26,000）。这$150 GST和$210 PST应如何处理？仅做送餐服务是否需要从第一天起强制注册?

a. Both the $150 GST and $210 PST are claimed on Line 106 as ITCs ($360 total), and restaurant meal delivery requires day-one registration just like ridesharing.
b. Only the $150 GST goes on Line 106 (the $210 PST is added to the asset's cost), and meal delivery does not trigger the day-one rideshare rule.
c. Neither tax can be claimed on Line 106 because capital equipment is excluded from ITCs in British Columbia.
d. The $210 PST is claimed on Line 106 while the $150 GST is expensed on Form T2125, and meal delivery is an exempt supply.

21. David is a self-employed architect (sole proprietor) in Vancouver who files his GST/HST return annually and has a December 31, 2026 fiscal year-end. He owes $4,800 in net GST for 2026. What are the statutory deadlines for David to pay the $4,800 net GST and to file his 2026 Form GST34 without incurring interest or late-filing penalties?

David是温哥华一名自雇建筑师（个体经营者），按年申报GST/HST，财年结束日为2026年12月31日。他2026年欠缴净GST $4,800。为避免产生利息或迟报罚款，David缴纳$4,800税款与提交2026年GST34报表的法定期限分别是哪一天?

a. Both the payment and the return are due on March 31, 2027 (three months after fiscal year-end).

b. Both the payment and the return are due on June 15, 2027.

c. The payment is due on April 30, 2027, and the return is due on June 15, 2027.

d. The return is due on April 30, 2027, and the payment is due on June 15, 2027.

21′. A small design corporation in Richmond, BC has a December 31, 2026 fiscal year-end and $420,000 in annual taxable supplies. It files its GST/HST return annually. When are the corporation's 2026 GST34 return and net tax payment due?

卑诗省列治文一家小型设计有限公司，财年结束日为2026年12月31日，年应税供应额为$420,000，按年申报GST/HST。该公司的2026年GST34报表与净税款何时到期?

a. Both the GST34 return and the net tax payment are due on March 31, 2027 (three months after the December 31 fiscal year-end).

b. The payment is due on April 30, 2027, and the return is due on June 15, 2027.

c. Both the return and the payment are due on January 31, 2027 (one month after year-end).

d. The return is due on June 30, 2027 (six months after year-end, matching the T2 corporate income tax filing deadline).

第 4 章 · 零工与平台收入 / Ridesharing, Delivery, and Short-Term Rentals: Gig Economy Taxes and Digital Platform Reporting Rules

自雇与小生意 / Self-employment and small business

带 ′ 的是同一考点的变式题：主题题做错时再做它。

22. In 2026, Leo earned $9,500 from passenger ridesharing and $12,000 from restaurant food delivery through digital apps in British Columbia. He has no other business income and his total gross revenue of $21,500 is well below $30,000. Which statement correctly describes Leo's GST/HST registration and collection obligations?

2026 年，里奥在 BC 省通过数字应用从事网约车载客取得 $9,500 收入，从事餐厅送餐取得 $12,000 收入。他没有其他经营收入，全年总收入 $21,500 远低于 $30,000。关于里奥的 GST/HST 登记与收税义务，下列哪项表述正确?

a. He does not need to register for or collect GST/HST on either activity because his combined four-quarter revenue is under the $30,000 small supplier threshold.

b. He must register for GST/HST from his first dollar of ridesharing revenue, and once registered, he must also collect GST/HST on his $12,000 food delivery revenue.

c. He must register and collect GST/HST only on the $9,500 ridesharing fares, while the $12,000 food delivery revenue remains exempt until delivery fees alone exceed $30,000.

d. He is only required to register and collect GST/HST starting at the end of the month following the quarter in which his combined revenue exceeds $2,800.

22′. In 2026, Clara worked exclusively as an independent food delivery courier in the first half of the year, earning $18,000 without registering for GST/HST. On September 1, 2026, she began accepting passenger ridesharing trips and earned $1,400 from ridesharing and $4,000 from food delivery during the rest of the year. How does starting passenger ridesharing affect her GST/HST obligations?

2026 年上半年，克拉拉仅从事独立送餐工作，取得 $18,000 收入且未登记 GST/HST。2026 年 9 月 1 日，她开始接网约车载客单，并在当年剩余时间里取得网约车收入 $1,400 和送餐收入 $4,000。开始接网约车载客单对她的 GST/HST 义务有何影响?

a. She remains a small supplier for the entire 2026 year because her total revenue of $23,400 is below $30,000.

b. She must register effective September 1, 2026 and retroactively pay GST/HST on the $18,000 earned from delivery in the first half of the year.

c. She registers effective September 1, 2026, and from then on collects GST/HST on both her ridesharing fares and the $4,000 of later delivery revenue.

d. She must collect GST/HST only on the $1,400 ridesharing fares while keeping the $4,000 delivery revenue outside the GST/HST system.

23. Tariq operates solely as a food delivery courier and is not registered for GST/HST. In Q1 and Q2 of 2026, he earned $5,000 per quarter. In Q3 of 2026, after earning $27,000 from regular app deliveries between July 1 and August 19, he signed and completed a $6,500 catering delivery contract on August 20, bringing his Q3 revenue to $33,500. When does Tariq cease to be a small supplier, and on which supplies must he start collecting GST/HST?

塔里克仅从事送餐配送且未登记 GST/HST。2026 年第一季度和第二季度，他每季收入均为 $5,000。2026 年第三季度，他在 7 月 1 日至 8 月 19 日间通过日常送餐取得 $27,000，随后在 8 月 20 日接下并完成了一笔 $6,500 的团体餐饮配送合同，使第三季度收入达到 $33,500。塔里克何时失去小供应商身份？必须从哪一笔供应开始收取 GST/HST?

a. He ceases to be a small supplier on October 31, 2026, and must collect GST/HST starting November 1, 2026.
b. He ceases to be a small supplier retroactive to July 1, 2026, and must remit GST/HST on the entire $33,500 earned in Q3.
c. He stops being a small supplier on August 20, 2026, must charge GST/HST on the whole $6,500 contract, and must register effective no later than that day.
d. He ceases to be a small supplier on August 20, 2026, but only has to collect GST/HST on the $3,500 portion of the contract that exceeded the $30,000 mark.

23′. Sonia is an unregistered food delivery courier. Her quarterly gross delivery revenues were $8,000 in Q4 2025, $7,500 in Q1 2026, $8,500 in Q2 2026, and $7,200 in Q3 2026 (ended September 30, 2026), bringing her four-quarter cumulative total to $31,200 without any single quarter exceeding $30,000. By what date does Sonia lose her small supplier status and need to begin collecting GST/HST?

索尼娅是一名未登记 GST/HST 的纯送餐员。她的季度配送总收入分别为：2025 年第四季度 $8,000、2026 年第一季度 $7,500、2026 年第二季度 $8,500、2026 年第三季度（截至 2026 年 9 月 30 日）$7,200。至此她连续四个季度累计达到 $31,200，且没有任何单个季度超过 $30,000。索尼娅在哪一天失去小供应商身份并须在其后开始收取 GST/HST?

a. At the end of October 31, 2026; she must charge GST/HST on supplies made on or after November 1, 2026.
b. She loses her small supplier status on the exact day in Q3 2026 when her cumulative four-quarter revenue crossed $30,000.
c. She loses her small supplier status on September 30, 2026, and must start collecting GST/HST on October 1, 2026.
d. She remains a small supplier for all of 2026 because her 2026 calendar-year revenue from Q1 to Q3 is only $23,200.

24. In 2026, Owen completed 22 passenger ridesharing trips on a digital platform, earning $640 in total consideration before stopping for the rest of the year. Owen believes the platform will not report his 2026 earnings to the CRA under the Reporting Rules for Digital Platform Operators (DPI) because he had fewer than 30 transactions and earned less than $2,800. Why is Owen's belief incorrect?

2026 年，欧文在一家数字平台上完成了 22 单网约车载客行程，共取得 $640 对价，随后全年未再出车。欧文认为，根据数字平台运营方申报规则（DPI），由于他全年少于 30 单且总金额不超过 $2,800，平台不会将他 2026 年的收入报告给 CRA。欧文的想法错在哪里?

a. The under–30–and–$2,800 exclusion covers only sellers of goods, so his ridesharing activity must be reported to the CRA by January 31, 2027.
b. The $2,800 exclusion threshold was repealed for the 2026 tax year and replaced by a universal $500 threshold for all platform sellers.
c. Ridesharing platforms are exempt from Part XX reporting, and instead report driver earnings only when a driver's annual fares exceed the $30,000 GST/HST threshold.
d. The platform only withholds his record if he pays a $500 opt–out fee before December 31, 2026.

24′. During 2026, two individuals used digital platforms: Priya sold 18 used household items for a total of $1,900 on a marketplace app, while Sam rented out his cottage for two weekends (2 transactions) for a total of $1,900 on a short–term accommodation app. Under the Part XX Reporting Rules for Digital Platform Operators (DPI), whose 2026 activity must the respective platform operator report to the CRA by January 31, 2027?

2026 年间，有两人在数字平台上开展活动：普里娅在二手交易应用上售出 18 件闲置家居物品，总对价 $1,900；山姆在短租应用上将度假屋出租了两个周末（共 2 笔交易），总对价也是 $1,900。根据《所得税法》Part XX 数字平台运营方申报规则（DPI），平台运营方必须在 2027 年 1 月 31 日前向 CRA 报告谁的 2026 年活动信息?

a. Neither Priya nor Sam, because both had fewer than 30 transactions and received no more than $2,800 during the calendar year.
b. Both Priya and Sam, because any transaction over $500 on a digital platform is reportable under Part XX.
c. Priya only, because selling tangible goods is always reportable whereas real property rentals under $30,000 are excluded.
d. Sam only, because the <30 transactions and ⩽$2,800 exclusion applies exclusively to the sale of goods, not to real property rentals.

25. In 2026, Elena is a full-time ridesharing driver with net self-employment income of $50,000 and no employment income. For 2026, the Year's Maximum Pensionable Earnings (YMPE) is $74,600, the basic exemption is $3,500, and the combined self-employed base and first additional CPP rate on this tier is 11.9% (producing a total contribution of $5,533.50). How is Elena's $5,533.50 CPP contribution treated on her 2026 T1 income tax return, and does she owe second additional CPP (CPP2)?

2026 年，埃琳娜是一名全职网约车司机，净自雇收入为 $50,000，无其他受雇工资收入。2026 年供款基本最高年收入（YMPE）为 $74,600，基本免税额为 $3,500，自雇双份合计费率为 11.9%（算出供款总额为 $5,533.50）。埃琳娜的这笔 $5,533.50 CPP 供款在 2026 年 T1 所得税申报表上应如何处理？她是否需要缴纳第二层附加供款（CPP2）？

a. The entire $5,533.50 is claimed as an income deduction on line 22200, and she also owes CPP2 on all of her net earnings above the $3,500 exemption.

b. The entire $5,533.50 is claimed on line 31000 as a non-refundable credit at the lowest rate, since every CPP amount is an employee-type contribution; no CPP2 is due.

c. She deducts the full $5,533.50 as a business expense on Form T2125 before arriving at her net self-employment income, and no CPP2 is payable for 2026.

d. Schedule 8 splits it: the employee half of the base contribution is a line 31000 credit, the rest is a line 22200 deduction, and no CPP2 is due below the $74,600 YMPE.

25′. In 2026, Gavin earned $85,000 in net self-employment income from his delivery business, reaching the Year's Additional Maximum Pensionable Earnings (YAMPE) of $85,000 (above the $74,600 YMPE). When Gavin completes Schedule 8 for his 2026 T1 return, how are the enhanced portion of his first-tier CPP (introduced since 2019) and his entire second-tier CPP2 contribution treated for tax purposes?

2026 年，加文通过送餐业务取得 $85,000 的自雇净收入，达到了 2026 年供款附加最高年收入（YAMPE）$85,000（高于 YMPE $74,600）。当加文为 2026 年 T1 申报表填报 Schedule 8 时，他第一层 CPP 中自 2019 年起新增的增强部分以及整笔第二层 CPP2 供款在税务上应如何处理？

a. Both the enhanced first-tier CPP portion and 100% of the CPP2 contributions are claimed only as non-refundable tax credits on line 31000.

b. Both the enhanced first-tier portion and all CPP2 are deducted on line 22200; only the base portion is split between line 22200 and line 31000.

c. All base CPP, enhanced CPP, and CPP2 contributions are split evenly 50/50 between line 22200 and line 31000.

d. CPP2 contributions are non-deductible and non-creditable because they apply only to earnings between $74,600 and $85,000.

26. Kevin started driving rideshare full-time in 2025. His net tax owing was under $3,000 in 2023 and $500 in 2024 (while still an employee), jumped to $5,200 in 2025, and is projected to be $5,600 in 2026. In February 2026, Kevin receives a Form INNS1 instalment reminder from the CRA showing very low suggested payments for March and June 2026 (based on his 2024 tax year), followed by an August 2026 reminder with larger payments for September and December 2026 (based on his 2025 tax year). Which statement is correct regarding Kevin's 2025 and 2026 instalment obligations?
凯文于 2025 年开始全职开网约车。他的净欠税额在 2023 年低于 $3,000、2024 年（尚为雇员时）为 $500，2025 年跃升至 $5,200，预计 2026 年将达到 $5,600。2026 年 2 月，凯文收到 CRA 寄来的 Form INNS1 分期预缴提醒信，上面基于 2024 税年算出的 2026 年 3 月和 6 月建议缴纳额极低；随后 2026 年 8 月收到的提醒信则基于 2025 税年列出了较高的 9 月和 12 月缴纳额。关于凯文 2025 年和 2026 年的分期预缴义务，下列哪项表述正确?

a. He was required to pay quarterly instalments in both 2025 and 2026, and he will be charged instalment interest for 2026 unless he recalculates and pays $1,400 in each of March, June, September, and December 2026.
b. No instalments were due for 2025; 2026 instalments are due because 2026 and 2025 both exceed $3,000, and paying the INNS1 reminder amounts on time avoids interest.
c. He is exempt from 2026 instalments because his 2024 net tax owing ($500) was below $3,000, and both prior years must exceed $3,000 to trigger instalments.
d. Because the CRA does not send instalment reminders until after an audit, Kevin must calculate his own safe-harbour quarterly payments in 2026 or face an automatic late penalty like in the United States.

26′. A Canadian ridesharing driver who also has U.S. tax filing obligations compares the tax instalment rules in both countries. Which statement accurately contrasts the Canadian personal tax instalment system (outside Quebec) with the U.S. estimated tax system as explained in the lecture?
一名同时负有美国报税义务的加拿大网约车司机对比两国的分期预缴规则。根据讲义说明，下列哪项准确对比了加拿大个人所得税分期预缴制度（魁北克以外）与美国预估税制度?

a. In Canada, the threshold is indexed to inflation each year, whereas in the U.S. the IRS mails Form INNS1 reminders in February and August.
b. In Canada, a single year with net tax owing over $1,800 triggers instalments across all provinces, whereas the U.S. requires two consecutive years over $3,000.
c. In both Canada and the U.S., taxpayers can wait for an official reminder letter before making any quarterly payment without incurring interest or penalties.
d. Canada uses a fixed $3,000 two-year test and CRA mails INNS1 reminders; in the U.S., taxpayers self-calculate under safe-harbour rules or face penalties.

27. In January 2026, Devon purchased a new sedan for $46,000 (plus tax) and used it 75% of the time in 2026 for commercial passenger ridesharing and 25% for personal driving. His friend Maya purchased an identical $46,000 sedan in January 2026 and used it 80% for restaurant food delivery and 20% for personal driving. Under the common filing practice described in the lecture, how are Devon's and Maya's vehicles classified for Capital Cost Allowance (CCA) in the year of acquisition?

2026 年 1 月，德文以 $46,000（另加税）购入一辆新轿车，并在 2026 年将其 75% 用于商业网约车载客、25% 用于个人驾驶。他的朋友玛雅于 2026 年 1 月购入一辆完全相同的 $46,000 轿车，将其 80% 用于餐厅送餐、20% 用于个人驾驶。按照讲义所述的多数报税实务，德文和玛雅的车辆在取得当年应如何进行资本成本扣除（CCA）归类?

a. Devon's car is excluded from the passenger-vehicle rules and goes to Class 10 with no cost cap; Maya's delivery car stays under the Class 10 / 10.1 rules.
b. Both Devon's and Maya's cars are placed in Class 10.1 because any sedan costing more than the passenger vehicle ceiling is subject to the luxury vehicle cap regardless of whether it carries passengers or food.
c. Both Devon's and Maya's cars are excluded from the 'passenger vehicle' definition because both are used more than 50% on digital gig platforms, placing both in Class 10 without a cost cap.
d. Devon's car is placed in Class 10.1 in 2026, but if his ridesharing use rises to 90% in 2027, the classification retroactively changes to Class 16 back to 2026.

27′. In 2026, Arthur bought a vehicle and used it 40% for passenger ridesharing, 35% for food delivery, and 25% for personal trips during the year of acquisition. In 2027, he stopped food delivery and used the vehicle 85% for passenger ridesharing. Does Arthur's vehicle qualify for the 'passenger vehicle' exclusion (exempting it from Class 10.1 cost limits), and why?

2026 年，亚瑟购入一辆汽车，在取得当年将其 40% 用于网约车载客、35% 用于送餐配送、25% 用于个人出行。2027 年，他停止送餐，将该车 85% 用于网约车载客。亚瑟的这辆车是否符合「乘用车辆」排除条件（从而不受 Class 10.1 成本上限约束）？为什么?

a. Yes, because his combined commercial platform use in 2026 was 75% (40% ridesharing plus 35% delivery), which exceeds the 50% threshold.
b. Yes, starting in 2027, because his passenger ridesharing use exceeded 50% in 2027, which reclassifies the vehicle out of the passenger vehicle rules.
c. No, because in the 2026 acquisition year ridesharing was only 40% of use, not over 50%, and later changes in use do not reclassify the car.
d. No, because any vehicle used for any amount of food delivery is automatically locked into Class 10.1 regardless of its purchase price.

28. In January 2027, Carlos, a GST/HST–registered ridesharing driver in Surrey, BC, receives his annual DPI information copy from his platform for the 2026 calendar year. The DPI copy reports total consideration paid or credited of $61,400, broken down by calendar quarter, whereas Carlos's own bookkeeping ledger shows gross fare revenue (excluding GST) of $57,800. Upon checking the column notes on the DPI copy, he sees that $3,600 of the $61,400 consists of customer tips paid through the app. How should Carlos reconcile and report these figures?

2027 年 1 月，BC 省素里市已登记 GST/HST 的网约车司机卡洛斯收到了平台寄来的 2026 日历年 DPI 年度信息副本。DPI 副本按日历季度列示的「支付或计入的对价」总额为 $61,400，而卡洛斯自己的台账记录的营业车资收入（不含 GST）为 $57,800。查看副本栏目说明后，他发现 $61,400 中有 $3,600 是客户通过应用支付的小费。卡洛斯应如何对账并申报这些数字?

a. Overwrite his ledger and report $61,400 as GST–taxable gross fare revenue on both Form T2125 and his GST/HST return so his numbers match the CRA's computer system.
b. Report only $57,800 on Form T2125 and omit the $3,600 in tips entirely, because tips are non–taxable gifts for both GST/HST and income tax.
c. Reconcile quarter by quarter, charge 5% GST only on the $57,800 of fares, and report the $3,600 of tips as income on the T2125 'Other income' line.
d. Deduct the $3,600 difference as a platform commission expense on Form T2125 and file a Voluntary Disclosures Program application for 2026.

28′. In January 2027, Jasmine receives her 2026 annual DPI information copy from her food delivery platform. Why does the DPI copy break down consideration, fees, commissions, and taxes into four separate calendar quarters rather than showing only a single annual total, and what is the primary tax risk if she fails to check how the platform categorizes tips on that statement?

2027 年 1 月，贾斯敏收到了送餐平台寄来的 2026 年度 DPI 信息副本。为什么 DPI 副本会将对价、费用、佣金和税款拆分为四个日历季度列示，而不是只给一个全年总数？如果她没有确认平台在副本上是如何归类小费的，最主要的税务风险是什么?

a. Quarterly figures show where a gap arises, and unless tips are separated from delivery fees she may misreport income or charge GST on tips.
b. Quarterly breakdowns are used to calculate quarterly CPP2 deductions at source, and tips must be separated because tips are subject to double GST/HST.
c. Quarterly breakdowns determine whether she had fewer than 30 transactions per quarter to qualify as an excluded seller, and tips are tax–free up to $2,800.
d. Quarterly breakdowns are required by WorkSafeBC to bill the courier for injury insurance, and tips are deducted on line 22200.

第 5 章 · 要不要注册公司 / Sole Proprietor or Incorporate

自雇与小生意 / Self-employment and small business

带 ′ 的是同一考点的变式题：主题题做错时再做它。

29. Liam and Chloe run a home-renovation business in Surrey, BC that earns $58,000 in net profit in 2026. They spend every dollar of profit each year on their mortgage and family groceries, leaving nothing retained in the business. A friend tells them to incorporate immediately to get the 11% small business tax rate. Based on 2026 rules, what is the true tax and cost outcome if they incorporate?

Liam和Chloe在BC省素里经营一家家居维修生意，2026年净利润为$58,000。他们每年把每一分利润都花在房贷和家庭日常开销上，生意账上分文不留。朋友建议他们立刻注册公司以享受11%的小企业税率。根据2026年规则，如果他们注册公司，真实的税务与成本结果是什么?

a. They will permanently save the difference between their personal marginal tax rate and the 11% corporate rate on the entire $58,000.
b. Almost no deferral, since no profit stays in the company, while added costs such as the $43.39 BC annual report and T2 fees leave them worse off.
c. Their corporation will be classified as a personal services business (PSB) and taxed at 45% because its net profit is under $100,000.
d. They can skip filing a T2 return in any year they withdraw all profits as salary and leave corporate taxable income at zero.

29′. Nora is a self-employed graphic designer in Burnaby, BC earning $55,000 net profit in 2026. She withdraws 100% of her earnings every month to pay rent and living expenses. Why does incorporating her business in 2026 fail to reduce her overall annual cost?

Nora是BC省本拿比的一名自雇平面设计师，2026年净利润为$55,000。她每个月将100%的收入取出来支付房租和生活费。为什么在2026年注册公司无法降低她的年度总成本?

a. Because the small business deduction (SBD) is only available once corporate active business income exceeds $500,000.
b. Because the dividend tax credit (DTC) is disallowed for corporations earning less than $100,000 in BC.
c. Because the CRA imposes a 5% surtax whenever a shareholder withdraws all corporate profits within the same fiscal year.
d. Deferral only exists on profit left in the company; withdrawing it all brings personal tax anyway, plus T2 and annual filing costs.

30. Devon incorporates a BC company in 2026 to sign a full-time software contract with a single non-associated tech firm in Vancouver, earning $140,000. Devon has no other clients, employs no other workers, and performs duties identical to the tech firm's regular employees. How will the CRA tax the retained income inside Devon's corporation in 2026?

Devon在2026年注册了一家BC省公司，与温哥华一家无关联的科技公司签下全职软件合同并赚取$140,000。Devon没有其他客户，没有雇用其他员工，工作性质与该科技公司的正式雇员完全相同。2026年CRA将如何对Devon公司内部留存的所得征税?

a. As a personal services business at 45% (28% federal + 5% PSB tax + 12% BC), with no SBD and no general rate reduction.
b. At the 11% combined small business corporate rate because the $140,000 income is well below the $500,000 federal business limit.
c. At the 27% combined general corporate rate because PSB income still qualifies for the 13% federal general rate reduction (GRR).
d. At 53.5% directly on the T2 corporate return to match the top BC personal marginal tax rate.

30′. Tariq owns 100% of a BC IT firm that derives all of its revenue in 2026 from a single long-term contract with one large bank. However, Tariq's corporation employs six full-time software engineers throughout the entire year to deliver the project. How is the corporation's income treated for tax purposes in 2026?

Tariq拥有一家BC省IT公司100%的股份，该公司2026年的全部收入均来自与一家大型银行签订的单一长期合同。不过，Tariq的公司全年雇用了6名全职软件工程师来交付该项目。2026年该公司的所得在税务上应如何处理?

a. It is automatically taxed at 45% as a personal services business (PSB) because 100% of its revenue comes from a single client.
b. It falls outside the PSB rules because it has more than five full-time employees all year, so the 11% small business rate can apply.
c. It avoids the 5% federal PSB surtax but is still barred from claiming the small business deduction, paying 27% instead.
d. It qualifies for the 11% rate only if the client bank is an associated corporation of Tariq's firm.

31. Elena and her spouse Sam are both listed as directors of their BC corporation, although only Sam manages the finances. In 2026, the corporation fails to remit payroll source deductions and GST/HST before ceasing operations. Under ITA s.227.1, which statement accurately describes Elena's personal liability?

Elena和她的配偶Sam都在他们的BC省公司挂名董事，尽管只有Sam实际管钱。2026年，该公司在停业前拖欠了未缴的工资源头代扣税款（payroll source deductions）和GST/HST。根据《所得税法》s.227.1，哪项准确描述了Elena的个人责任?

a. Elena has zero personal liability because incorporation provides absolute limited liability protection against all corporate debts and taxes.
b. Elena is automatically exempt because she was a passive spouse who did not manage the company's daily bank accounts.
c. She is jointly liable with the corporation for the unremitted amounts, unless she shows due diligence or has been off the board for over two years.
d. Elena is personally liable for the unremitted amounts for up to ten years after she resigns as a corporate director.

31′. Victor formally resigned as a director of a struggling BC corporation on March 1, 2024. When the corporation collapsed later on, it owed commercial trade suppliers $80,000 and owed the CRA $25,000 in unremitted payroll source deductions. If the CRA attempts to assess Victor personally on June 15, 2026, what is the legal result?

Victor于2024年3月1日正式辞去一家陷入困境的BC省公司的董事职务。该公司随后倒闭，欠商业供应商$80,000货款，并欠CRA $25,000未缴的工资代扣税款。如果CRA在2026年6月15日试图对Victor个人进行追责评税，法律结果是什么?

a. He owes neither: limited liability covers the $80,000 trade debt, and more than two years have passed since he resigned as a director.
b. Victor must pay both the $80,000 commercial supplier debt and the $25,000 CRA payroll tax debt personally.
c. Victor is protected from the CRA payroll tax debt immediately upon resigning, without any waiting period.
d. Victor remains personally liable for the $25,000 payroll tax debt because there is no statutory time limit on director's liability.

32. A newly incorporated BC bakery selects September 30, 2026 as its first corporate tax year-end. Assuming it qualifies for the standard CCPC balance-due extension, how do its T2 filing deadline and tax balance-due date compare?

一家新注册的BC省烘焙公司选择2026年9月30日作为其第一个公司税年结日（tax year-end）。假设它符合标准的CCPC欠税延期条件，它的T2申报截止日与欠税到期日分别是什么时候?

a. Both the T2 return and the tax balance are due on April 30, 2027, matching the personal T1 tax deadline.
b. The T2 return is due two months after year-end, while the tax balance is due six months after year-end.
c. Both the T2 return and the tax balance are due six months after year-end (March 31, 2027).
d. The T2 is due six months after year-end, but the balance is due two months after (three for an eligible CCPC).

32′. Hannah incorporated a BC holding company in 2025, opened a bank account, and then left the company completely inactive with $0 revenue throughout its 2026 tax year. Which statement is correct regarding the company's 2026 T2 Corporation Income Tax Return?

Hannah在2025年注册了一家BC省公司，开了银行账户后在整个2026税年里完全没有任何业务活动，收入为$0。关于该公司2026税年的T2公司所得税申报表，哪项表述是正确的?

a. She does not need to file a T2 return because the corporation had zero revenue and no active operations in 2026.
b. She must still file a T2 within six months of year-end, because every resident corporation files yearly unless it falls in a narrow exempt group.
c. She only needs to pay the $43.39 BC Annual Report fee, which automatically replaces the federal T2 tax return for inactive companies.
d. She can report the inactive corporation's status on her personal T1 Form T2125 instead of filing a separate T2 return.

33. Sophia is opening a single neighbourhood bakery that will operate exclusively in Vancouver, BC, with no plans to expand outside the province. She notices online federal incorporation costs $200 while BC provincial incorporation costs $380 ($350 base + $30 name approval). Which option actually results in lower initial registration government fees for her BC-only business, and why?

Sophia准备在BC省温哥华开一家社区面包店，只在BC省内经营，没有跨省扩张计划。她注意到联邦网上注册费是$200，而BC省内注册费是$380（$350基本费＋$30名称核准费）。对于她只限于BC省的生意，哪种选择实际产生的首次政府注册规费更低，为什么？

a. BC incorporation at $380, because a federal company operating in BC must also pay $380 for extra-provincial registration ($580 in total).
b. Federal incorporation at $200 total, because federal registration automatically includes provincial registration in all ten provinces at no extra cost.
c. Federal incorporation, because only federal corporations qualify for the 9% federal small business tax rate.
d. BC provincial incorporation, because federal corporations are barred from claiming the BC 2% small business rate.

33′. An e-commerce brand plans to operate warehouses in three provinces and wants nationwide corporate name protection across Canada. Aside from initial registration fees, how do the ongoing annual corporate maintenance filing fees compare between federal incorporation (online) and BC provincial incorporation?

一家电商品牌计划在三个省份设立仓库，并希望获得覆盖全加拿大的全国公司名称保护。除首次注册费外，联邦注册（网上）与BC省内注册的年度维持申报费用相比如何？

a. Both federal and BC corporations pay an identical $30 annual maintenance fee.
b. A federal corporation pays $380 every year, while a BC corporation pays $200 every year.
c. A federal corporation pays $12 per year online for its Annual Return, while a BC corporation pays $43.39 per year for its Annual Report.
d. Neither jurisdiction charges any annual fee at all, as long as the corporation files its T2 return on time with the CRA.

34. After building a successful manufacturing business in BC for five years, Owen sells the business to an arm's-length buyer in 2026 and realizes a $1,000,000 capital gain. Under 2026 rules, in which scenario can Owen shelter the gain using the $1,275,000 lifetime capital gains exemption (LCGE)?
在BC省成功经营一家制造企业五年后，Owen于2026年将该生意出售给一位非关联买家，实现$1,000,000资本利得。根据2026年规则，在哪种情形下Owen可以用$1,275,000的终身资本利得豁免（LCGE）免除该笔利得的税款?

a. He operates as a sole proprietor and sells the manufacturing equipment, inventory, and goodwill directly to the buyer.
b. He sells shares of his corporation that has held 60% of its assets in passive stock portfolios and only 40% in active business assets.
c. He incorporates the business one month before the sale and immediately sells the newly issued shares without meeting the 24-month holding period requirement.
d. He sells qualified small business corporation shares (QSBCS) of a CCPC meeting the 90%+ active business asset test and 24-month holding period requirement.

34′. For the 2026 tax year (after indexation resumed), what are the maximum lifetime capital gains exemption (LCGE) limit and the corresponding maximum taxable capital gains deduction for disposing of qualified small business corporation shares (QSBCS)?
在恢复指数化后的2026税年，处置合格小企业公司股份（QSBCS）适用的终身资本利得豁免（LCGE）上限及对应的最高应税资本利得扣除上限分别是多少?

a. An exemption limit of $1,016,836 and a deduction limit of $508,418.
b. An exemption limit of $500,000 and a deduction limit of $250,000.
c. An exemption limit of $1,275,000 and a corresponding deduction limit of $637,500.
d. An exemption limit of $1,250,000 with no indexation adjustment in 2026.

35. A profitable BC CCPC has accumulated a large investment portfolio inside the corporation and also wants to pay dividends to the founder's adult family members who do not work in the business. Under the anti-avoidance rules governing corporations, what happens when the corporation's passive investment income exceeds $50,000 and reaches $150,000?
一家盈利丰厚的BC省CCPC在公司内部积累了庞大的投资组合，同时还想向不参与公司经营的创始人成年家庭成员发放股息。在管辖公司的防滥用规则下，当公司的被动投资收入超过$50,000并达到$150,000时会发生什么?

a. The business limit shrinks from $50,000 of passive income and hits zero at $150,000, and dividends to non-working relatives face TOSI.
b. The corporation's $500,000 business limit is untouched until passive investment income exceeds $10 million.
c. The corporation is reclassified as a personal services business (PSB) and taxed at 45% on all active income.
d. Dividends paid to family members who do not work in the business are always taxed at the 11% corporate small business rate.

35′. Which three anti-avoidance mechanisms does the Income Tax Act use to prevent taxpayers from artificially splitting income or hoarding investment assets inside a CCPC to abuse the 11% small business rate?

《所得税法》使用哪三道防滥用机制来防止纳税人通过人为分拆收入或在CCPC内部囤积投资资产来滥用11%的小企业低税率?

a. Extra-provincial registration fees, mandatory GIFI schedules, and the 53-week year-end rule.

b. Dividend gross-up, dividend tax credit (DTC), and the federal abatement of 10 percentage points.

c. The passive income grind ($50,000 to $150,000), the tax on split income (TOSI), and the personal services business (PSB) rules.

d. The lifetime capital gains exemption (LCGE), the section 85 rollover, and the three-month balance-due extension.

第 6 章 · T2 与小企业扣除 / T2 Return & Small Business Deduction

公司税 T2 / Corporate tax (T2)

带 ′ 的是同一考点的变式题：主题题做错时再做它。

36. Design Co. is a private corporation incorporated in British Columbia with a regular December 31 year-end. Until June 30, 2026, 100% of its shares were owned by Ms. Lin, a Canadian resident. On July 1, 2026, Ms. Lin sold 55% of the voting shares to an investor who resides in Singapore. Which statement accurately describes the tax consequences for Design Co. in 2026?

Design Co. 是一家在卑诗省注册的私人公司，常规年结日为 12 月 31 日。在 2026 年 6 月 30 日之前，其 100% 股份由加拿大居民林女士持有。2026 年 7 月 1 日，林女士将 55% 的表决权股份出售给一位居住在新加坡的投资人。下列哪项准确描述了 Design Co. 在 2026 年的税务后果?

a. The corporation remains a CCPC for all of 2026 because it was a CCPC on the first day of its fiscal period, so its full $500,000 business limit applies at 11% for the entire calendar year.

b. It stops being a CCPC on July 1 with a deemed year-end just before; the short year before the sale keeps a prorated limit at 11%, and later years pay 27%.

c. Because Ms. Lin still resides in Canada and manages daily operations, the corporation remains a CCPC, and only the Singapore investor's 55% share of corporate profit is taxed at 27%.

d. The corporation loses CCPC status retroactively to January 1, 2026, so its entire 2026 income from January 1 to December 31 is taxed at 27% on a single T2 return.

36′. Tech Co. is a Canadian private corporation whose voting shares are held 60% by two Canadian residents and 40% by a public corporation listed on a designated stock exchange. However, under a unanimous agreement and debt covenant, the public corporation has the legal and practical power to appoint a majority of the board of directors. Does Tech Co. qualify as a CCPC for 2026?

Tech Co. 是一家加拿大私人公司，其表决权股份由两名加拿大居民持有 60%，一家在指定证券交易所上市的公众公司持有 40%。但根据一致协议和债务契约，该公众公司拥有任命董事会多数席位的法律与实际权力。Tech Co. 在 2026 年是否符合 CCPC 资格?

a. Yes, because Canadian residents hold more than 50% of the voting shares, which satisfies the de jure control test.

b. Yes, because none of Tech Co.'s own shares are listed on a designated stock exchange.

c. Yes, but its $500,000 federal business limit must be reduced by 40% to reflect the public corporation's ownership share.

d. No, because control includes de facto control, and a public corporation that can appoint most of the board controls it in fact.

37. Roaster Co., an unassociated CCPC in British Columbia with no passive income and taxable capital under $1,000,000, was incorporated on March 1, 2026 and chose December 31, 2026 as its first fiscal year-end (a 306-day tax year). Its 2026 active business income in Canada and taxable income are both $460,000. What is its prorated business limit and how much of its income is taxed at the 27% combined general rate?

Roaster Co. 是卑诗省一家无联营关系的 CCPC，无被动收入且应税资本低于 $1,000,000。该公司于 2026 年 3 月 1 日注册成立，选择 2026 年 12 月 31 日作为首次年结日（税年共 306 天）。其 2026 年加拿大境内经营活动收入与应税收入均为 $460,000。其按比例摊分后的经营限额是多少？有多少收入须按 27% 的合并一般税率交税？

a. The limit is $419,178 ($500,000 × 306 ÷ 365), so that amount is taxed at 11% and the remaining $40,822 at the 27% general rate.

b. The business limit remains $500,000 because the $500,000 threshold is an annual cap that is never prorated for a newly incorporated CCPC, leaving $0 taxed at 27%.

c. The business limit remains $500,000, but the 11% combined tax rate is prorated by 306 ÷ 365 to 9.22% on the entire $460,000.

d. The first $419,178 is completely tax-free under the prorated small business deduction, and only the remaining $40,822 pays the 11% small business rate.

37′. Bakery Co., an unassociated CCPC in BC, had a 73-day short tax year in 2026 due to an approved change of fiscal year-end. During this 73-day period, it earned $120,000 of Canadian active business income (equal to its taxable income), with no business limit reductions. What is its federal small business deduction (SBD) for this 73-day tax year?

Bakery Co. 是卑诗省一家无联营关系的 CCPC，因获批变更年结日在 2026 年产生了一个 73 天的短税年。在这 73 天内，它赚取了 $120,000 的加拿大境内经营活动收入（等于其应税收入），且无限额递减。该 73 天短税年的联邦小企业扣除（SBD）是多少？

a. $22,800, calculated as 19% of the full $120,000 of active business income earned in the short year.

b. $95,000, calculated as 19% of the full $500,000 statutory business limit for the year.

c. $19,000, because the limit is prorated to $100,000 ($500,000 × 73 ÷ 365), the least of the four amounts.

d. $9,000, calculated as 9% of the $100,000 prorated business limit for the 73 days.

38. Manufacturing Co. is an unassociated CCPC in Richmond, BC. In its preceding tax year, it had $26,000,000 of taxable capital employed in Canada and $80,000 of adjusted aggregate investment income (AAII). In 2026, it earned $700,000 of active business income in Canada. Under the current 2026 rules (and comparing them with the old taxable capital rule for tax years starting before April 7, 2022), what is its reduced business limit for 2026?

Manufacturing Co. 是卑诗省列治文一家无联营关系的 CCPC。在上一税年，其在加拿大使用的应税资本为 $26,000,000，调整后合计投资收入（AAII）为 $80,000。2026 年该公司赚取了 $700,000 的加拿大境内经营活动收入。按 2026 现行规则（并对比 2022 年 4 月 7 日之前开始的税年适用的应税资本旧规则），其 2026 年递减后的经营限额是多少?

a. $150,000 under current 2026 rules, because the $200,000 taxable capital reduction and the $150,000 passive income reduction are added together ($350,000 total reduction).
b. $350,000 under current 2026 rules, because only the $150,000 passive income reduction applies to manufacturing corporations.
c. $300,000 now, taking the greater $200,000 capital reduction over the $150,000 passive one; the pre-2022 rule ($15,000,000 cap) would give $0.
d. $500,000 under current 2026 rules, because the corporation had zero passive income in the current 2026 tax year.

38′. Holding Co., an unassociated CCPC, had $12,000,000 of taxable capital employed in Canada and $90,000 of adjusted aggregate investment income (AAII) in its preceding tax year. Under the current 2026 tax-year rules, what is its reduced federal business limit for 2026?

Holding Co. 是一家无联营关系的 CCPC，上一税年在加拿大使用的应税资本为 $12,000,000，调整后合计投资收入（AAII）为 $90,000。按 2026 税年现行规则，其 2026 年递减后的联邦经营限额是多少?

a. $275,000, by subtracting both the $25,000 taxable capital reduction and the $200,000 passive income reduction from $500,000.
b. $300,000, because the $200,000 passive income reduction is greater than the $25,000 taxable capital reduction, and only the greater applies.
c. $475,000, because the corporation can elect to apply the smaller $25,000 taxable capital reduction.
d. $0, because any AAII above $50,000 immediately eliminates the entire $500,000 business limit.

39. In Surrey, BC, Mr. Wang owns 100% of the shares of Renovation Co. (2026 taxable active business income of $380,000) and his spouse, Mrs. Wang, owns 100% of the shares of Cleaning Co. (2026 taxable active business income of $260,000). Neither spouse holds any shares in the other's corporation, and there is no third corporation. How does the small business deduction apply for 2026, and what changes if Mr. Wang acquires 30% of the common shares of Cleaning Co.?

在卑诗省素里，王先生 100% 持有装修公司 Renovation Co.（2026 年应税经营活动收入 $380,000），其配偶王太太 100% 持有清洁公司 Cleaning Co.（2026 年应税经营活动收入 $260,000）。夫妻双方在对方公司均无任何持股，且不存在第三家公司。2026 年小企业扣除应如何适用？如果王先生取得了 Cleaning Co. 的 30% 普通股，情况会如何变化？

a. They are already associated because Mr. and Mrs. Wang are married, so they must share one $500,000 business limit on Schedule 23 regardless of cross-ownership.
b. Unassociated now, each with its own $500,000 limit; at 30% cross-ownership they become associated and share one limit on Schedule 23, leaving $140,000 at 27%.
c. Even if Mr. Wang acquires 30% of Cleaning Co., they remain unassociated because 30% is less than the 50% voting control threshold.
d. Once associated, both corporations can still claim 100% of the $500,000 business limit each by filing separate Schedule 9 forms without filing Schedule 23.

39′. Alpha Corp. (100% owned by Sister A) and Beta Corp. (100% owned by Sister B) have no cross-ownership between the sisters, so they would not normally be associated. However, both Alpha Corp. and Beta Corp. are associated with a third corporation, Gamma Corp. Gamma Corp. files a Schedule 28 election not to be associated with Alpha and Beta for purposes of connecting them. What is the statutory price of filing this Schedule 28 election?

Alpha Corp.（由姐姐 A 100% 持有）和 Beta Corp.（由妹妹 B 100% 持有）之间没有任何交叉持股，本来不联营。但 Alpha 和 Beta 都与第三家公司 Gamma Corp. 联营。Gamma Corp. 提交了 Schedule 28 选择表，选择不作为穿透桥梁使 Alpha 与 Beta 联营。提交这张 Schedule 28 选择表的法定代价是什么？

a. Investment income received from Gamma Corp. that would otherwise be treated as active business income can no longer qualify for the small business deduction.
b. Alpha Corp. and Beta Corp. must each pay a flat $1,000 election penalty under ITA s.162(7.2) for every year the election stays in force.
c. Alpha Corp. and Beta Corp. both lose their CCPC status for the year and can no longer claim the BC 2% small business rate on any income.
d. There is no tax cost at all, because Schedule 28 is purely an informational form, filed in the same way as the Schedule 50 shareholder list.

40. Timber Co. is an unassociated CCPC in BC with a fiscal year starting November 11, 2025 and ending November 10, 2026. Its 2025 and 2026 corporate tax payable are both $18,000, its taxable income is $160,000 (claiming the SBD each year), and its taxable capital is $2,000,000. However, it remitted its August 2026 GST return two months late. When is its 2026 balance-due day, when is its T2 filing deadline, and how must it pay instalments for its next tax year starting November 11, 2026?

Timber Co. 是卑诗省一家无联营关系的 CCPC，税年自 2025 年 11 月 11 日起至 2026 年 11 月 10 日止。其 2025 年与 2026 年应缴公司税均为 $18,000，应税收入为 $160,000（每年均申领 SBD），应税资本为 $2,000,000。但它在 2026 年 8 月曾迟交迟缴过一次 GST 报表（晚了两个月）。其 2026 税年的欠税截止日、T2 申报截止日分别是哪天？自 2026 年 11 月 11 日起的下一税年应如何分期预缴？

a. Balance-due day is May 10, 2027, T2 filing deadline is May 10, 2027, and no instalments are required because its taxable income is under $500,000.

b. Balance-due day is January 10, 2027 (2 months), T2 filing deadline is May 31, 2027, and it qualifies for quarterly instalments starting February 11, 2027.

c. Balance due February 10, 2027; T2 due May 10, 2027; the late GST payment removes quarterly status, so monthly instalments start December 10, 2026.

d. Balance-due day is February 10, 2027, T2 filing deadline is May 10, 2027, and its first monthly instalment is due December 31, 2026 because instalments are always due on the last day of each calendar month.

40′. Logistics Co. has a March 31, 2026 fiscal year-end. Its total Part I corporate tax payable was $2,400 in 2025 and $9,600 in 2026. It is not a CCPC because it is controlled by a non-resident parent company. What are its 2026 balance-due day, its 2026 T2 filing deadline, and was it required to make tax instalments during its 2026 tax year?

Logistics Co. 的会计年结日为 2026 年 3 月 31 日。其 Part I 应缴公司税在 2025 年为 $2,400，在 2026 年为 $9,600。由于受非居民母公司控制，它不是 CCPC。其 2026 税年的欠税截止日、T2 申报截止日分别是哪天？在 2026 税年期间它是否需要分期预缴？

a. Balance due May 31, 2026 (no CCPC extension), T2 due September 30, 2026, and no instalments for 2026 because 2025 tax was $2,400.

b. Balance-due day is June 30, 2026 (3 months after year-end), T2 filing deadline is September 30, 2026, and monthly instalments were required in 2026 because 2026 tax exceeded $3,000.

c. Balance-due day and T2 filing deadline are both September 30, 2026, and quarterly instalments were required in 2026.

d. Balance-due day is May 31, 2026, T2 filing deadline is December 31, 2026, and instalments were required because the two-year average tax exceeded $3,000.

41. Two BC corporations both have a December 31, 2025 year-end (filing deadline June 30, 2026) and both file their T2 returns exactly 4 full months late on November 2, 2026. Corp X had $40,000 of total 2025 tax but paid the full $40,000 through instalments before the filing deadline (unpaid tax on June 30, 2026 is $0). Corp Y had $40,000 of total 2025 tax, paid $10,000 before the filing deadline (leaving $30,000 unpaid on June 30, 2026), and is a first-time late filer. What are the late-filing penalties for Corp X and Corp Y?

两家卑诗省公司的年结日均为 2025 年 12 月 31 日（申报截止日为 2026 年 6 月 30 日），且都在 2026 年 11 月 2 日迟交 T2 报表（恰好迟报满 4 个整月）。X 公司 2025 年税款总额为 $40,000，但在申报截止日前已通过分期预缴足额交清 $40,000（2026 年 6 月 30 日未缴税款为 $0）。Y 公司 2025 年税款总额也是 $40,000，截止日前已交 $10,000（2026 年 6 月 30 日未缴税款为 $30,000），且属于首次迟报。X 公司和 Y 公司的迟报罚款分别是多少?

a. Corp X pays $3,600 (9% of $40,000 total tax) and Corp Y also pays $3,600 (9% of $40,000 total tax).
b. Corp X pays $1,000 and Corp Y pays $5,100 (the maximum 17% penalty on $30,000 unpaid tax).
c. Corp X pays $0 and Corp Y pays $5,400 (18% repeat-offender rate on $30,000 unpaid tax).
d. Corp X pays $0, since nothing was unpaid at the deadline, and Corp Y pays $2,700 (9% of its $30,000 unpaid tax).

41′. Repair Co. had $20,000 of unpaid corporate tax on its T2 filing deadline and filed its return 6 full months late. The CRA had issued a formal demand to file, and Repair Co. had already been assessed a late-filing penalty on a prior T2 return within the preceding 3 tax years. What late-filing penalty applies?

Repair Co. 在 T2 申报截止日有 $20,000 未缴公司税，且迟交报表满 6 个整月。CRA 此前已向其发出正式申报要求（demand to file），且该公司在前 3 个税年内曾因迟报被处以过迟报罚。此次应适用多少迟报罚款?

a. $2,200, calculated at the standard rate of 5% plus 1% per month for 6 months (11% of $20,000).
b. $4,400, calculated at the repeat-offender rate of 10% plus 2% per full month for 6 months (22% of the $20,000 unpaid tax).
c. $10,000, because any repeat late filing automatically triggers a flat 50% penalty regardless of how many months late the return is.
d. $3,400, because late-filing penalties for corporations are always capped at 17% of unpaid tax.

42. In June 2026, a qualifying CCPC with a permanent establishment in British Columbia acquires and puts into use $1,000,000 (net of assistance) of eligible new manufacturing and processing equipment, and later pays a dividend to its individual shareholder out of active business income that was taxed at the 11% small business rate. Which statement correctly describes both the 2026 BC Manufacturing and Processing Investment Tax Credit and the personal dividend gross-up on that dividend?

2026 年 6 月，一家在卑诗省设有常设机构的合资格 CCPC 购入并投入使用净支出为 $1,000,000（已扣除指定援助）的合资格新制造加工设备，随后用按 11% 小企业低税率课税后的经营活动利润向个人股东派发股息。下列哪项同时准确描述了 2026 年卑诗省制造加工投资税收抵免（BC M&P ITC）以及该笔股息在个人层面的毛额化（gross-up）比例?

a. A refundable 15% BC credit of $150,000 (within the $2,000,000 annual cap shared with associates), and a 15% gross-up with a 9/13 federal dividend credit.
b. The corporation deducts an extra $150,000 expense on Schedule 1 instead of a tax credit, and the shareholder grosses up the dividend by 38% with a 6/11 federal dividend tax credit.
c. The 15% BC credit can be claimed by any public corporation even before the equipment is available for use, and the dividend is tax-free to the shareholder because the corporation already paid 11% tax.
d. The BC credit is capped at $500,000 of expenditures per corporation without association sharing, and the non-eligible dividend is grossed up by 19% to match the federal SBD rate.

42′. Why does the lecture describe the Small Business Deduction (SBD) as a tax deferral rather than a permanent tax reduction under Canada's corporate-personal tax integration system?

在加拿大公司税与个人税的整合（integration）制度下，为什么讲义将小企业扣除（SBD）的本质描述为「税款递延（tax deferral）」而非「永久减免」？

a. Because the CRA requires every CCPC to repay its accumulated SBD in cash to the federal government at the end of its tenth fiscal year.
b. Because the SBD is a refundable tax credit that must be added back to taxable income on Schedule 1 in the following tax year.
c. Because the low-taxed profit is later paid out as non-eligible dividends, grossed up 15% with a 9/13 credit, so total tax ends up roughly as if earned personally.
d. Because integration guarantees that corporate retention followed by dividend distribution produces the exact same tax to the penny as paying a salary in every province and every year.

第 7 章 · 被动收入磨减 / Passive Investment Income in a CCPC

公司税 T2 / Corporate tax (T2)

带 ′ 的是同一考点的变式题：主题题做错时再做它。

43. In its 2026 tax year, Pinecrest Manufacturing Ltd., a Canadian-controlled private corporation (CCPC), reports the following passive and capital items: (1) $30,000 of Canadian term-deposit interest; (2) a $100,000 capital gain ($50,000 taxable capital gain) from selling a factory building used actively in its manufacturing business until the sale; and (3) $25,000 of eligible portfolio dividends from Canadian public corporations (deductible under s.112). What are Pinecrest's aggregate investment income (AII) and adjusted aggregate investment income (AAII) for 2026?

在 2026 税年，加拿大受控私人公司（CCPC）Pinecrest Manufacturing Ltd. 报告了以下被动与资本项目：(1) 加拿大定期存款利息 $30,000；(2) 出售一处直到出售前一直用于其制造业务的厂房，实现资本利得 $100,000（应税资本利得 $50,000）；(3) 来自加拿大上市公司的合资格组合股息 $25,000（可按 s.112 扣除）。Pinecrest 在 2026 税年的合计投资收入（AII）与调整后合计投资收入（AAII）分别是多少?

a. AII is $80,000 and AAII is $55,000.

b. AII is $55,000 and AAII is $80,000.

c. AII is $80,000 and AAII is $105,000.

d. AII is $105,000 and AAII is $55,000.

43′. In 2026, Oakridge Logistics Inc., a CCPC, earns $40,000 of net rental income from a warehouse leased to an unrelated tenant, realizes an $80,000 capital gain ($40,000 taxable capital gain) from selling delivery trucks used exclusively in its active freight business, and receives $15,000 of taxable dividends from public Canadian corporations. What are Oakridge's AII and AAII for 2026?

2026 税年，一家 CCPC（Oakridge Logistics Inc.）从出租给非关联租户的仓库赚取净租金收入 $40,000，出售专门用于其积极货运业务的送货卡车实现资本利得 $80,000（应税资本利得 $40,000），并收到加拿大上市公司的应税股息 $15,000。Oakridge 在 2026 税年的 AII 和 AAII 分别是多少?

a. AII is $55,000 and AAII is $80,000.

b. AII is $80,000 and AAII is $95,000.

c. AII is $80,000 and AAII is $55,000.

d. AII is $40,000 and AAII is $40,000.

44. Westbrook Design Ltd. is a CCPC operating solely in British Columbia with a December 31 year-end, no associated corporations, and taxable capital well below $10,000,000. In 2025, Westbrook had adjusted aggregate investment income (AAII) of $80,000 and active business income of $500,000. In 2026, Westbrook has AAII of $20,000 and active business income of $500,000. By how much is Westbrook's 2026 small business deduction business limit reduced, and how much additional combined federal and BC corporate tax does it pay on its 2026 active business income because of that reduction?

Westbrook Design Ltd. 是一家仅在卑诗省经营的 CCPC，年结日为 12 月 31 日，无联营公司，应税资本远低于 $10,000,000。2025 年，Westbrook 的调整后合计投资收入（AAII）为 $80,000，积极经营收入为 $500,000。2026 年，Westbrook 的 AAII 为 $20,000，积极经营收入为 $500,000。Westbrook 在 2026 税年的小企业扣除经营限额被削减了多少？由于该削减，其 2026 年积极经营收入多交了多少联邦与卑诗省合计公司税？

a. The 2026 business limit is reduced by $0, and additional tax is $0, because 2026 AAII of $20,000 is below the $50,000 threshold.
b. The 2026 business limit is reduced by $150,000, and additional combined federal and BC corporate tax is $24,000.
c. The 2026 business limit is reduced by $400,000, and additional combined federal and BC corporate tax is $64,000.
d. The 2026 business limit is reduced by $150,000, and additional combined corporate tax is $9,000 because BC does not parallel the federal passive income grind.

44′. Northshore Engineering Inc. is a BC CCPC with a December 31 year-end and no associated corporations. In 2025, it sold an idle rental lot and reported adjusted aggregate investment income (AAII) of $110,000. In 2026, it has $0 of passive income and $500,000 of active business income. What is Northshore's remaining small business deduction business limit for 2026, and how much additional combined federal and BC tax does it owe in 2026 as a result of the 2025 AAII?

Northshore Engineering Inc. 是一家年结日为 12 月 31 日、无联营公司的卑诗省 CCPC。2025 年，该公司出售了一块闲置出租地块，报告调整后合计投资收入（AAII）为 $110,000。2026 年，其被动收入为 $0，积极经营收入为 $500,000。Northshore 在 2026 税年剩余的小企业扣除经营限额是多少？受 2025 年 AAII 影响，其 2026 年需多交多少联邦与卑诗省合计公司税？

a. The remaining 2026 business limit is $200,000, and additional combined tax is $48,000.
b. The remaining 2026 business limit is $500,000, and additional combined tax is $0, because passive income returned to zero in 2026.
c. The remaining 2026 business limit is $0, and additional combined tax is $80,000, because $110,000 multiplied by 5 exceeds $500,000.
d. The remaining 2026 business limit is $200,000, and additional combined tax is $18,000, reflecting only the 6% federal rate difference.

45. Summit Holdings Ltd. (a CCPC) owns 15% of the voting shares of Valley Supply Inc. (a CCPC), representing 15% of the fair market value of all issued shares of Valley Supply. The remaining 85% of Valley Supply is owned by an unrelated individual, so the two corporations are not associated. In 2026, Valley Supply pays a total non-eligible dividend of $200,000 out of active business income taxed at the small business rate and receives a $0 dividend refund. Summit Holdings receives its 15% share ($30,000). How much Part IV tax does Summit Holdings owe on the $30,000 dividend?

Summit Holdings Ltd.（一家 CCPC）持有 Valley Supply Inc.（一家 CCPC）15% 的表决权股份，且占 Valley Supply 已发行全部股份市值的 15%。其余 85% 股份由一名非关联个人持有，因此两家公司并非联营（not associated）。2026 年，Valley Supply 用按小企业低税率课税的积极经营利润派发了总额 $200,000 的非合资格股息，且未获得任何股息退税（$0）。Summit Holdings 收到其 15% 的份额（$30,000）。Summit Holdings 就这 $30,000 股息应缴多少 Part IV 税?

a. $11,500, because the two corporations are not associated and all dividends from non-associated corporations are taxed at 38⅓%.
b. $1,725, being 15% of the $11,500 Part IV tax that a portfolio dividend of this size would attract.
c. $0, because the >10% votes and >10% value test makes Valley Supply connected, and it got no dividend refund.
d. $9,200, calculated at the 30⅔% refundable Part I tax rate because the dividend was non-eligible.

45′. Harbour Ventures Inc. (a CCPC) holds shares of Cascade Tech Ltd. (a CCPC) that carry 12% of the voting rights, but because of a large class of preferred shares held by other investors, Harbour's shares represent only 8% of the total fair market value of all issued shares of Cascade Tech. The owners of the two companies are siblings. In 2026, Harbour receives a $100,000 eligible dividend from Cascade Tech, which received no dividend refund on the payment. How much Part IV tax must Harbour Ventures pay?

Harbour Ventures Inc.（一家 CCPC）持有 Cascade Tech Ltd.（一家 CCPC）12% 表决权的股份，但由于其他投资者持有大量优先股，Harbour 所持股份仅占 Cascade Tech 已发行全部股份总市值的 8%。两家公司的股东是亲兄妹。2026 年，Harbour 从 Cascade Tech 收到 $100,000 合资格股息，Cascade Tech 就该次派息未获得任何股息退税。Harbour Ventures 必须缴纳多少 Part IV 税?

a. $0, because the owners are siblings and the voting-share stake is above the 10% threshold.
b. $38,333, because the 8% value stake fails the connected test, so full 38⅓% Part IV tax applies.
c. $30,667, at the 30⅔% refundable rate, because the value stake is below the 10% threshold.
d. $0, because eligible dividends a CCPC receives from another CCPC are exempt from Part IV tax.

46. At the end of its 2026 tax year (before calculating any dividend refund), Maple Ridge Consulting Ltd., a CCPC, has an eligible RDTOH (ERDTOH, line 530) balance of $15,000 and a non-eligible RDTOH (NERDTOH, line 545) balance of $23,000. Which of the following statements about a 2026 dividend payment correctly states the resulting dividend refund?

在 2026 税年末（计算股息退税之前），一家 CCPC（Maple Ridge Consulting Ltd.）的合资格池（ERDTOH，line 530）余额为 $15,000，非合资格池（NERDTOH，line 545）余额为 $23,000。下列关于 2026 年派息及其股息退税的表述，哪一项正确?

a. Paying a $60,000 eligible dividend yields a refund of $23,000, drawing $15,000 from ERDTOH and $8,000 from NERDTOH.

b. Paying a $60,000 non-eligible dividend yields a refund of $15,000 drawn from ERDTOH first, leaving NERDTOH untouched.

c. Paying a $100,000 non-eligible dividend yields a refund of $38,000: all $23,000 of NERDTOH first, then all $15,000 of ERDTOH.

d. Paying a $100,000 non-eligible dividend yields a refund of only $23,000, because non-eligible dividends can never access ERDTOH.

46′. At the end of 2026, Bayside Properties Inc., a CCPC that earns only rental and interest income, has an ERDTOH balance of $0 and a NERDTOH balance of $30,667. The corporation also has a general rate income pool (GRIP) balance of $80,000 from prior years' high-rate business income. In 2026, Bayside pays an $80,000 dividend and designates the entire amount as an eligible dividend. How much dividend refund will Bayside receive for 2026?

2026 年末，仅赚取租金和利息收入的 CCPC（Bayside Properties Inc.）账上 ERDTOH 余额为 $0，NERDTOH 余额为 $30,667；同时该公司因早年按一般税率纳税的经营利润而拥有 $80,000 的一般税率收入池（GRIP）余额。2026 年，Bayside 派发了 $80,000 股息，并将其全额指定为合资格股息。Bayside 在 2026 税年能拿到多少股息退税?

a. $0, because an eligible dividend can only trigger a refund out of ERDTOH, which has a zero balance.

b. $30,667, because the corporation has sufficient GRIP to support the $80,000 eligible dividend designation.

c. $24,533, calculated as 30⅔% of the $80,000 dividend paid.

d. $15,333, because half of NERDTOH can be refunded when GRIP is reduced to zero.

47. On June 1, 2026, Cedar Creek Holdings Ltd., a CCPC owned equally by two shareholders, files Form T2054 and pays a $150,000 dividend for which it elects under s.83(2) to treat the full amount as a capital dividend. Upon assessment, the CRA determines that Cedar Creek's capital dividend account (CDA) balance immediately before the dividend became payable was only $100,000 due to an earlier unrecorded capital loss. If no s.184(3) election is made to treat the excess as a separate taxable dividend, what is the tax consequence?

2026 年 6 月 1 日，由两名股东平分股权的 CCPC（Cedar Creek Holdings Ltd.）提交了 T2054 表格并派发 $150,000 股息，按 s.83(2) 选择将全额作为资本股息。经评税，CRA 认定由于早先有一笔未入账的资本亏损，Cedar Creek 在股息成为应付前一刻的资本股息账户（CDA）余额仅为 $100,000。如果不作 s.184(3) 选择将超额部分改作单独的应税股息，税务后果是什么？

a. The corporation owes a penalty capped at $500 per year under s.83(4), and the $50,000 excess is automatically added to the shareholders' T5 slips.
b. The corporation owes Part III.1 tax of $10,000 (20% of the $50,000 excess), and the shareholders have no personal liability for this corporate tax.
c. The whole $150,000 election fails because a s.83(2) election must be made for the full amount, so all of it is taxed.
d. Part III tax of $30,000 (60% of the $50,000 excess) is due from the election date; each shareholder is liable up to $15,000.

47′. On March 15, 2026, Silver Birch Ltd., a private corporation, verified with the CRA via Schedule 89 that its capital dividend account (CDA) balance was $80,000. On March 20, 2026, it filed Form T2054 and paid an $80,000 capital dividend to its sole shareholder. In October 2026 (within the same tax year), Silver Birch sold publicly traded shares and realized a $60,000 capital loss ($30,000 non-allowable half). What is the Part III tax consequence for the March 20, 2026 capital dividend?

2026 年 3 月 15 日，私人公司 Silver Birch Ltd. 通过 Schedule 89 向 CRA 核实其资本股息账户（CDA）余额为 $80,000。2026 年 3 月 20 日，该公司提交 T2054 表格并向唯一股东派发了 $80,000 资本股息。2026 年 10 月（同一税年内），Silver Birch 出售上市股票并实现了 $60,000 资本亏损（不可抵扣的一半为 $30,000）。2026 年 3 月 20 日那笔资本股息的 Part III 税后果是什么？

a. The corporation owes $18,000 of Part III tax (60% of $30,000) because CDA is calculated at the end of the tax year.
b. The corporation owes $0 of Part III tax because the CDA balance is tested immediately before the dividend becomes payable, not at year-end.
c. The corporation must file a s.184(3) election within 90 days of year-end to reclassify $30,000 as an ordinary dividend.
d. The $30,000 non-allowable capital loss reduces the corporation's life insurance CDA component and triggers a 20% penalty.

48. Which of the following statements accurately describes the rules governing the general rate income pool (GRIP) and eligible dividend designations for a Canadian-controlled private corporation (CCPC) in 2026?

下列哪项表述准确描述了 2026 税年加拿大受控私人公司（CCPC）关于一般税率收入池（GRIP）及合资格股息指定的规则?

a. GRIP is computed at year-end with a 0.72 general rate factor; eligible dividends above it bear 20% Part III.1 tax, or 30% if inflated.

b. A CCPC must first reduce its low rate income pool (LRIP) to zero on Schedule 54 before it may pay any eligible dividend out of GRIP.

c. GRIP must be calculated immediately before each dividend payment, and any excess eligible dividend designation is taxed at 60% under Part III.

d. A CCPC may treat a dividend as eligible without ever notifying shareholders in writing, as long as it reports the designation on its T2.

48′. In June 2026, Pacific Timber Ltd., a CCPC with a December 31 year-end, pays a $100,000 dividend and records a resolution in its board minutes notifying the shareholder that the entire dividend is an eligible dividend. At that time, its GRIP balance from 2025 was $0, as it expected high-rate income in the second half of 2026. Due to a market downturn, its 2026 year-end GRIP turns out to be only $40,000 (with no abusive tax avoidance). What is the consequence?

2026 年 6 月，年结日为 12 月 31 日的 CCPC（Pacific Timber Ltd.）派发了 $100,000 股息，并在董事会纪要中记录决议，书面通知股东该股息全额为合资格股息。当时其承接自 2025 年的 GRIP 余额为 $0，因为公司预计 2026 年下半年会有按一般税率纳税的收入。由于市场下滑，其 2026 年末计算的 GRIP 最终只有 $40,000（无滥用避税安排）。后果是什么?

a. The entire $100,000 designation attracts the 20% Part III.1 tax, because GRIP was $0 on the June payment date.

b. $60,000 is an excessive designation taxed at 20% ($12,000), removable if the shareholder consents to treat it as non-eligible.

c. A 30% Part III.1 tax ($18,000) applies, since paying an eligible dividend before GRIP is earned is treated as artificial.

d. The corporation owes $36,000 (60% of the $60,000 excess) under Part III unless it files Form T2054 within 90 days.

49. Kootenay Precision Ltd., a stand-alone CCPC, had $12,000,000 of taxable capital employed in Canada in its preceding tax year and $70,000 of adjusted aggregate investment income (AAII) in its tax year ended in the preceding calendar year. Applying the 2026 rules, by how much is Kootenay's $500,000 small business deduction business limit reduced?

独立 CCPC（Kootenay Precision Ltd.）上一税年在加拿大运用的应税资本为 $12,000,000，上一历年内结束的税年的调整后合计投资收入（AAII）为 $70,000。按 2026 税年现行规则，Kootenay 的 $500,000 小企业扣除经营限额被削减多少?

a. $125,000, because the $25,000 taxable capital grind and the $100,000 passive income grind are added together.
b. $25,000, because the smaller of the taxable capital grind and the passive income grind is the one that applies.
c. $200,000, because the taxable capital grind phases the business limit out between $10M and $15M of capital.
d. $100,000, the greater of the $25,000 taxable capital grind and the $100,000 passive income grind.

49′. In 2025, Fraser Valley Corp. changed its fiscal year-end with CRA approval, resulting in two tax years ending in the 2025 calendar year: the first had AAII of $35,000 and taxable capital of $4,000,000; the second had AAII of $45,000 and taxable capital of $5,000,000. How is Fraser Valley's 2026 small business deduction business limit affected by the passive income grind?

2025 年，Fraser Valley Corp. 经 CRA 批准变更了财政年结日，导致在 2025 历年内有两个税年结束：第一个税年的 AAII 为 $35,000、应税资本为 $4,000,000；第二个税年的 AAII 为 $45,000、应税资本为 $5,000,000。Fraser Valley 在 2026 税年的小企业扣除经营限额受被动收入递减的影响是多少?

a. The 2026 business limit is reduced by $0 because only the immediately preceding tax year's AAII ($45,000) is counted, which is under $50,000.
b. The 2026 business limit is reduced by $0 because neither tax year in 2025 individually exceeded the $50,000 AAII threshold.
c. The 2026 business limit is reduced by $150,000 because the AAII of all tax years ending in the preceding calendar year must be totalled ($80,000).
d. The 2026 business limit is reduced by $400,000 because both the AAII ($80,000) and the taxable capital ($9,000,000) of the two tax years are combined.

第 8 章 · 工资还是股息 / Owner-Manager Compensation: Salary vs. Dividend

公司税 T2 / Corporate tax (T2)

带 ′ 的是同一考点的变式题：主题题做错时再做它。

50. Marcus is the sole owner-manager of a British Columbia retail CCPC. Since incorporating three years ago, he has compensated himself exclusively with $100,000 of non-eligible dividends each year and $0 in salary. He has no other income sources. Which statement accurately describes his tax and benefit position for 2026?

Marcus 是一家卑诗省零售类 CCPC 的唯一业主经理。自三年前成立公司以来，他每年全部以 $100,000 非合资格股息的形式给自己发薪酬，工资为 $0，且无其他收入来源。关于他 2026 年的税务与福利状况，下列哪项表述准确?

a. He accumulates $18,000 of new RRSP contribution room each year, but he does not build any CPP pensionable earnings.

b. He generates no new RRSP room, accumulates no CPP pensionable earnings, and has a $0 earned income base for childcare deductions.

c. He can claim childcare expenses up to two-thirds of his $115,000 grossed-up dividend, though his RRSP room remains zero.

d. His corporation can deduct the $100,000 dividend as an operating expense, saving 11% in combined corporate income tax.

50′. Sonia owns 100% of a BC graphic design CCPC. In 2026, her corporation has $150,000 of pre-tax profit eligible for the small business deduction. She wants to create exactly $12,600 of new RRSP contribution room for 2027 and qualify to deduct her toddler's daycare fees as the lower-income spouse. What must she do?

Sonia 100% 持有一家卑诗省平面设计 CCPC。2026 年公司有 $150,000 符合小企业扣除条件的税前利润。她希望为 2027 年创造恰好 $12,600 的新增 RRSP 供款额度，并作为低收入一方具备扣除幼儿托儿费的资格。她必须怎么做?

a. Pay herself $70,000 in non-eligible dividends and retain the remaining profit inside the corporation.

b. Pay herself a $60,870 non-eligible dividend so that the 15% gross-up brings her taxable dividend to $70,000.

c. Leave all $150,000 inside the corporation and transfer 18% of the corporate after-tax profit directly to her RRSP.

d. Pay herself $70,000 in employment salary, which generates $12,600 of RRSP room (18%) and counts as earned income for childcare.

51. A British Columbia CCPC earns $100 of active business income in 2026 that fully qualifies for the federal and BC small business deduction (combined 11% corporate tax rate). It distributes the entire $89 after-tax profit as a non-eligible dividend to its sole shareholder. How is this dividend treated on the shareholder's 2026 personal tax return?

一家卑诗省 CCPC 在 2026 年赚取 $100 积极营业收入，全额享受联邦与卑诗省小企业扣除（合计 11% 公司税率）。公司将税后剩下的 $89 利润全部作为非合资格股息分给唯一股东。这笔股息在股东 2026 年个人税表上如何处理?

a. Grossed up by 38% to $122.82, with a federal dividend tax credit of 6/11 of the gross-up and a BC credit of 12% of the taxable dividend.
b. Grossed up by 15% to $102.35, with a BC provincial dividend tax credit equal to 1.96% of the $89.00 actual cash dividend received.
c. Grossed up by 15% to $102.35, with a federal dividend tax credit of 9/13 of the gross-up and a BC credit of 1.96% of the $102.35 taxable dividend.
d. Reported at its actual cash amount of $89.00 with no further personal tax payable because corporate integration is exact.

51′. A BC corporation has accumulated income in its General Rate Income Pool (GRIP) that was taxed at the general corporate rate (15% federal plus 12% BC). In 2026, it properly designates and pays an eligible dividend to its shareholder. Which gross-up and dividend tax credit (DTC) rates apply?

一家卑诗省公司在一般税率收入池（GRIP）中积累了按一般公司税率（联邦 15% 加 BC 省 12%）完税的利润。2026 年公司合规指定并向股东派发一笔合资格股息。适用哪组毛额化与股息税收抵免（DTC）比例?

a. A 38% gross-up, a federal DTC of 6/11 of the gross-up amount, and a BC DTC of 12% of the grossed-up taxable dividend.
b. A 15% gross-up, a federal DTC of 9/13 of the gross-up amount, and a BC DTC of 1.96% of the grossed-up taxable dividend.
c. A 38% gross-up, a federal DTC of 9/13 of the gross-up amount, and a BC DTC of 12% of the actual cash dividend received.
d. A 27% gross-up matching the combined federal and BC general corporate rate, with a full dollar-for-dollar tax credit.

52. Tariq owns 100% of the voting shares of his BC consulting CCPC. In 2026, the corporation pays him an employment salary of $90,000. Given that the 2026 YAMPE for CPP2 is $85,000, which statutory payroll deductions and employer contributions apply to Tariq's salary?

Tariq 持有其卑诗省咨询类 CCPC 100% 的有表决权股份。2026 年公司向他发放 $90,000 雇佣工资。已知 2026 年 CPP2 的年度额外最高可保收入上限（YAMPE）为 $85,000，Tariq 的工资适用哪些法定薪资扣缴与雇主供款?

a. Both employee and employer pay base CPP (5.95% each) up to the YMPE and CPP2 (4% each) from the YMPE to $85,000, with $0 in EI premiums.
b. Both employee and employer pay base CPP, CPP2, and mandatory Employment Insurance (EI) premiums up to the annual Maximum Insurable Earnings.
c. Tariq pays the combined 11.9% CPP personally on his T1 return at year-end, so the corporation does not need a payroll program account (RP).
d. The 4% CPP2 contribution applies to all employment income above the YMPE, including the $5,000 portion above $85,000.

52′. Nadia holds 45% of the voting shares of a BC manufacturing corporation, while two unrelated investors hold the remaining 55%. She works as the general manager and receives a $70,000 salary in 2026. How is her salary treated for Employment Insurance (EI) and CPP purposes?

Nadia 持有一家卑诗省制造公司 45% 的有表决权股份，另外两名无关联投资人持有其余 55%。她担任总经理并在 2026 年领取 $70,000 工资。她的工资在雇佣保险（EI）和 CPP 上如何处理?

a. Subject to both CPP and EI because she holds less than 50% of the voting shares and is not in control.
b. Exempt from both CPP and EI because a shareholder with over 40% of the voting shares falls outside payroll rules.
c. Exempt from EI because her stake exceeds 40% of the votes, but she and the corporation each pay 5.95% CPP.
d. The corporation pays only the 5.95% employer CPP share, and Nadia is exempt from the employee CPP share.

53. Victor, age 52, owns 100% of a Surrey restaurant corporation. His spouse, Rosa, age 49, owns non-voting shares (worth 5% of total corporate value) and worked 25 hours per week managing inventory during six prior taxation years from 2018 to 2023, though she did not work at the restaurant in 2026. If the corporation pays Rosa a $40,000 dividend in 2026, how does TOSI apply?
52 岁的 Victor 100% 持有素里一家餐厅公司的表决权股份。他 49 岁的配偶 Rosa 持有无表决权股份（占公司总市值 5%），在 2018 至 2023 年共六个过往纳税年度中每周工作 25 小时负责库存管理，但 2026 年未在餐厅工作。若公司 2026 年向 Rosa 派发 $40,000 分红，TOSI 如何适用?

a. The dividend is taxed at the top marginal rate under TOSI because Rosa did not work at least 20 hours per week in 2026.
b. The dividend is excluded from TOSI under the excluded shares rule because a restaurant is not a professional corporation.
c. Taxed at the top marginal rate under TOSI because Victor, the owner, has not yet reached age 65 in 2026.
d. Exempt from TOSI under the excluded business rule, since Rosa worked 20+ hours a week in five prior years.

53′. Arthur turned 65 in 2026. For the past 30 years, he has been the sole active operator of a BC plumbing CCPC. His spouse, Wendy, age 61, has never worked in the business and owns only non-voting shares worth 2% of the company. If the corporation pays Wendy a $35,000 dividend in 2026, how is it taxed?
Arthur 在 2026 年满 65 岁。过去 30 年里他一直是卑诗省一家水暖工程 CCPC 的唯一实际经营者。他 61 岁的配偶 Wendy 从未在公司工作，且仅持有占公司市值 2% 的无表决权股份。若公司 2026 年向 Wendy 派发 $35,000 分红，该如何课税?

a. At the top marginal tax rate under TOSI because Wendy has not yet reached age 65 and never worked 20 hours per week.
b. At Wendy's graduated marginal tax rates because Arthur is 65 in 2026 and the income would be exempt from TOSI if received by him.
c. At Wendy's graduated marginal tax rates under the excluded shares exception because plumbing is not a professional corporation.
d. Disallowed as a deduction to the corporation under the s.67 reasonableness test because Wendy performed no services.

54. Liam's wholly owned CCPC has a December 31 taxation year-end. On April 1, 2026, Liam borrows $200,000 interest-free from the corporation to use as a down payment on a personal vacation cottage (not as an employee loan). What is the latest date he can repay the principal to avoid a s.15(2) loan inclusion, and does an interest benefit still apply?

Liam 全资持有的 CCPC 年结日为 12 月 31 日。2026 年 4 月 1 日，Liam 因股东身份从公司无息借出 $200,000 用于个人度假屋首付（非雇员购房贷款例外）。为避免按 s.15(2) 将本金整笔并入所得，他最迟须在哪天还清本金？是否仍会产生利息福利？

a. Repay by December 31, 2026; if repaid by then, neither the principal nor any deemed interest benefit is included in his income.
b. Repay by December 31, 2027 (not part of a series of loans and repayments); a s.80.4 deemed interest benefit at the prescribed rate still applies.
c. Repay by April 1, 2027 (365 days from the date of the advance); if repaid by then, no s.80.4 interest benefit arises.
d. Repay by February 28, 2027 (the T4A filing deadline); the corporation can deduct the forgone interest as a business expense.

54′. Hannah is the sole shareholder of a BC corporation with a June 30 taxation year-end. On August 10, 2025 (during the corporation's fiscal year ending June 30, 2026), she borrows $150,000 at 1% interest for personal use while the CRA prescribed rate is 3%. Assuming this is not part of a series of loans and repayments, what occurs if she repays the full principal on May 15, 2027?

Hannah 是一家年结日为 6 月 30 日的卑诗省公司的唯一股东。2025 年 8 月 10 日（属于截至 2026 年 6 月 30 日的公司财年），她按 1% 利率向公司借款 $150,000 用于个人用途，当时 CRA 规定利率为 3%。假设非循环借还，若她在 2027 年 5 月 15 日全额还清本金，会发生什么？

a. The principal escapes s.15(2) as it was repaid before June 30, 2027, but the 2% rate gap is a s.80.4 benefit.
b. The full $150,000 principal is included in her 2025 income because it was not repaid within 12 months of August 10, 2025.
c. No taxable benefit arises under either s.15(2) or s.80.4 because she paid a positive 1% rate on the loan.
d. Both the $150,000 principal and a 3% deemed interest benefit are taxed as eligible dividends on a T5 slip.

55. A BC corporation purchases an automobile for $50,000 (including taxes) and makes it available to its sole shareholder for all 12 months of 2026. The shareholder drives the car 18,000 km in total during the year, of which 7,000 km is for business and 11,000 km is personal. How is the standby charge calculated, and if the benefit is provided strictly by virtue of shareholding, which slip is used?

一家卑诗省公司以 $50,000（含税）买断一辆汽车，并在 2026 年全年 12 个月提供给唯一股东使用。股东全年共行驶 18,000 公里，其中公务 7,000 公里、私用 11,000 公里。汽车待命费（standby charge）如何计算？若该福利纯因股东身份提供，应使用哪张滑单申报？

a. 2% × $50,000 × 12 months, reduced by multiplying by (11,000 ÷ 20,004), and reported on a T5 slip as a non-eligible dividend.
b. 2/3 × $50,000 × 12 months with no reduction, reported on a T4 slip so that it generates CPP pensionable earnings.
c. Full standby charge of 2% × $50,000 × 12 months ($12,000) with no reduction because business use is not over 50%, reported on a T4A slip.
d. Full standby charge of 2% × $50,000 × 12 months ($12,000), reported on a T4A slip and eligible for the 1.96% BC dividend tax credit.

55′. A corporation leases a vehicle for $900 per month (including taxes) and makes it available to its shareholder-employee for all 12 months of 2026. He drives 24,000 km in total during the year, including 18,000 km for business and 6,000 km for personal use, and keeps no mileage logbook, estimating the split from memory. How is his standby charge determined?

一家公司以每月 $900（含税）租赁一辆汽车，在 2026 年全年 12 个月提供给股东兼雇员使用。他全年共行驶 24,000 公里，其中公务 18,000 公里、私用 6,000 公里，但未记行车日志，仅凭感觉估算比例。他的汽车待命费如何确定？

a. 2/3 × $900 × 12 months, reduced by multiplying by 6,000 ÷ (1,667 × 12) because estimated business use exceeds 50%.
b. 2% × $900 × 12 months with no reduction, because he failed to maintain a contemporaneous mileage logbook.
c. $0 standby charge, because business use represents 75% of the total kilometres driven during the year.
d. The full lease standby charge of 2/3 × $900 × 12 months ($7,200), since no logbook supports a reduction.

56. Gavin owns 100% of a BC software CCPC. In 2026, the corporation pays his 19-year-old daughter $65,000 in salary for updating the company website for two hours a month — a task that an arm's-length freelancer would perform for $3,000 a year. What is the tax consequence of this salary payment, and when are payroll remittances normally due?

Gavin 100% 持有一家卑诗省软件 CCPC。2026 年公司向他 19 岁的女儿支付 $65,000 工资，工作内容是每月花两小时更新公司网站——同等工作找非关联自由职业者每年只需 $3,000。这笔工资支出有何税务后果？常规按月汇缴源头扣缴的截止日是哪天？

a. Under s.67, the corporation's deduction is denied for the unreasonable $62,000 excess; regular monthly payroll remittances are due by the 15th of the following month.
b. The $65,000 salary is automatically taxed at the top marginal rate under the Tax on Split Income (TOSI) rules because she worked under 20 hours per week.
c. The entire $65,000 is deductible by the corporation as long as a T4 slip is filed by the last day of February of the following year.
d. The corporation is assessed a 20% Part III.1 penalty tax on the $62,000 excess salary paid to a specified family member.

56′. An owner-managed CCPC in BC hires the owner's spouse as the full-time office and purchasing manager, paying her $45,000 in 2026. Comparable arm's-length managers in the local market earn between $42,000 and $48,000. Which statement correctly describes the deductibility and filing requirements for her remuneration?

一家卑诗省业主经理 CCPC 雇佣业主配偶担任全职办公室兼采购经理，2026 年支付工资 $45,000。当地市场上非关联同类岗位经理的年薪在 $42,000 至 $48,000 之间。下列哪项准确描述了该笔薪酬的扣除资格与申报要求？

a. The $45,000 is non-deductible because salaries paid to a spouse are disallowed unless the owner-manager is at least 65 years old.
b. All $45,000 is deductible because it passes the s.67 reasonableness test; the T4 is due by the end of February.
c. The corporation can report the $45,000 on both a T4 and a T5 so the spouse gets RRSP room and the dividend credit.
d. The corporation must file Form T2054 on the exact day each paycheque to the spouse becomes payable.

第 9 章 · 股东贷款、s.85 与清算 / Shareholder Loans, Section 85 Rollovers, ABILs, Wind-ups 公司税 T2 / Corporate tax (T2)

带 ′ 的是同一考点的变式题：主题题做错时再做它。

57. Ms. Gao owns 100% of the shares of Cedar Design Inc., which has a December 31 taxation year-end. On March 1, 2026, she withdraws an $80,000 interest-free loan from the corporation to renovate her principal residence. It is not part of a series of loans and repayments. By what date must she repay the loan so that the $80,000 principal is not included in her 2026 income under ITA s.15(2)?

高女士持有雪松设计公司 100% 的股份，该公司税年结束日为 12 月 31 日。2026 年 3 月 1 日，她从公司支取一笔 $80,000 的无息借款用于装修自住房，且不属于一系列借与还。她最迟必须在哪一天之前还清这笔钱，才能使 $80,000 本金不按 ITA s.15(2) 计入她 2026 年的收入？

a. March 1, 2027, which is exactly one year after the date she received the $80,000 loan.
b. December 31, 2027, which is one year after the end of the corporation's 2026 taxation year in which the loan was made.
c. January 30, 2027, which is 30 days after the end of the 2026 calendar year.
d. No fixed deadline applies, because a loan used for a shareholder's principal residence is exempt under s.15(2.4).

57′. Mr. Deng is the sole shareholder of Pacific Supply Ltd., which has a January 31 taxation year-end. On February 1, 2026, he borrows $100,000 from the corporation for personal use (not part of a series of loans and repayments). What is the latest date he can repay the principal to qualify for the one-year repayment exception under ITA s.15(2.6)?

邓先生是太平洋供应公司的唯一股东，该公司税年结束日为 1 月 31 日。2026 年 2 月 1 日，他因个人用途从公司借款 $100,000（不属于一系列借与还）。为符合 ITA s.15(2.6) 的一年还款例外，他最迟可在哪一天归还本金？

a. February 1, 2027, one calendar year from the date the funds were advanced.
b. January 31, 2027, the end of the corporation's taxation year in which the loan was made.
c. December 31, 2027, one year after the end of the 2026 calendar year.
d. January 31, 2028, which is one year after the corporation's January 31, 2027 taxation year-end.

58. Using the same facts for Ms. Gao (an $80,000 interest-free loan received on March 1, 2026, outstanding for 306 days in 2026, and repaid in full in November 2027), the CRA prescribed rate is 3% for all four quarters of 2026. If she pays no interest to the corporation, what is her 2026 deemed interest benefit under ITA s.80.4, and by what date could she pay interest to eliminate it?
沿用高女士的情形（2026 年 3 月 1 日借入 $80,000 无息贷款，2026 年内未偿期 306 天，并于 2027 年 11 月全额还清），2026 税年四个季度的 CRA 规定利率均为 3%。若她未向公司支付利息，2026 年按 ITA s.80.4 计算的视同利息利益是多少？她最迟可在哪一天前付息以将该利益抵为零？

a. Approximately $2,012; she can eliminate the benefit by paying the interest on or before January 30, 2027.
b. $0; because the loan is repaid within the s.15(2.6) window in November 2027, no benefit arises under s.80.4.
c. Approximately $2,012; she can eliminate the benefit by paying the interest at any time before November 2027 when the principal is repaid.
d. $80,000 plus $2,012; both the loan principal and the deemed interest benefit are taxed in 2026.

58′. An employee-shareholder receives an interest-free home relocation loan from his corporation on January 1, 2026, when the CRA prescribed rate is 3%. If the loan remains outstanding for more than five years and prescribed rates fluctuate in future quarters, how does ITA s.80.4(4) and (6) govern the rate used to calculate his deemed interest benefit?
一名雇员股东于 2026 年 1 月 1 日从其公司取得一笔无息搬迁购房贷款，放款当时的 CRA 规定利率为 3%。若该贷款存续超过五年且未来各季度的规定利率发生波动，ITA s.80.4(4) 与 (6) 如何规定其视同利息利益的计算利率？

a. The rate is permanently fixed at 3% for the whole life of the loan, even if the quarterly prescribed rate falls below 3%.
b. The rate floats freely with each quarter's prescribed rate with no cap, since only non-shareholder employees get a rate cap.
c. Capped at the 3% rate in force when the loan was made (a lower current rate applies if rates fall), re-locked after five years.
d. No deemed interest benefit is calculated during the first five years, after which the full principal is added to income under s.15(2).

59. Mr. Kuan incorporates his sole proprietorship in 2026 and transfers equipment (FMV $60,000, UCC $22,000), inventory (FMV $30,000, cost $30,000), and internally generated goodwill (FMV $90,000, tax cost $0) to his new corporation under ITA s.85. Total FMV is $180,000 and total tax cost is $52,000. If he takes back a $80,000 promissory note plus common shares and tries to elect at $52,000, what is the immediate tax result?

关先生在 2026 年将其个体户装进公司，按 ITA s.85 转让设备（公平市值 $60,000，未折旧资本成本 $22,000）、存货（公平市值 $30,000，成本 $30,000）和自建商誉（公平市值 $90,000，税基 $0）。公平市值合计 $180,000，税基合计 $52,000。若他从公司拿走一张 $80,000 的票据外加普通股，并试图将选举金额填为 $52,000，当年的即时税务后果是什么?

a. He realizes zero income in 2026 because an s.85 election always defers gain when common shares are included in the consideration.
b. The minimum elected amount is pushed up to the $80,000 boot under s.85(1)(b), triggering $28,000 of immediate gain in 2026.
c. The entire s.85 election becomes invalid and he is taxed on the full $128,000 accrued gain in 2026.
d. The $28,000 excess boot is taxed as a shareholder loan under s.15(2) unless repaid by the end of the next taxation year.

59′. Mr. Kuan makes the s.85 transfer in 2026. As a self-employed individual, his 2026 T1 filing deadline is June 15, 2027. His new corporation chooses May 31, 2027 as its first taxation year-end, making its T2 filing deadline November 30, 2027. Which property CANNOT be included in the s.85 rollover, and what is the filing deadline for Form T2057?

关先生在 2026 年进行 s.85 转让。作为有自雇收入的个人，他 2026 年 T1 的报税截止日为 2027 年 6 月 15 日；新公司选择 2027 年 5 月 31 日为首个税年结束日，其 T2 报税截止日为 2027 年 11 月 30 日。下列哪类财产不能用 s.85 转让，且 T2057 表的递交截止日是哪一天?

a. Real property held as inventory cannot be rolled over; Form T2057 is due on June 15, 2027.
b. Internally generated goodwill cannot be rolled over; Form T2057 is due on November 30, 2027 with the corporate T2.
c. Real property held as inventory cannot be rolled over; Form T2057 is due on November 30, 2027.
d. Depreciable equipment cannot be rolled over; Form T2057 is due on June 15, 2027.

60. In 2026, Mr. Yuen makes a valid ITA s.50(1) election on an uncollectible $50,000 loan he had advanced to his insolvent small business corporation. In 2019, he had claimed a $30,000 capital gains deduction under s.110.6 (exempting $60,000 of capital gains). What is the allowable business investment loss (ABIL) he can deduct against his 2026 employment income on T1 line 21700?

2026 年，袁先生就其借给名下资不抵债小企业公司的一笔 $50,000 坏账作出有效的 ITA s.50(1) 视同处置选举。2019 年，他曾按 s.110.6 申报过 $30,000 的资本利得扣除（即豁免了 $60,000 资本利得）。他可在 2026 年 T1 line 21700 用以抵扣雇佣收入的可扣营业投资损失（ABIL）是多少?

a. $25,000, calculated as the $50,000 business investment loss multiplied by the 2026 one-half inclusion rate.
b. $33,335, calculated using the 66.67% inclusion rate that older 2024 training examples applied to the loss.
c. $10,000, calculated by subtracting the $30,000 prior deduction from the $50,000 loss and multiplying the remainder by one-half.
d. $0, since s.39(9) cuts the $50,000 loss by twice the prior $30,000 deduction ($60,000), leaving no ABIL.

60′. Suppose Mr. Yuen had NEVER claimed the lifetime capital gains exemption in any prior year, so his $50,000 loss in 2026 produces a $25,000 ABIL. Which rules govern the small business corporation (SBC) timing test for this loss and the carryforward of any unused ABIL?

假设袁先生在以往任何年度都未曾用过终身资本利得豁免，因此 2026 年的 $50,000 损失产生 $25,000 的 ABIL。关于该笔损失的小企业公司（SBC）时点测试及未用完 ABIL 的结转，适用哪项规则?

a. The company must meet the SBC test on the exact day of disposition, and unused ABIL carries forward for 20 years against any income.
b. SBC status at any time in the 12 months before disposal suffices; unused ABIL carries forward 10 years, then becomes a net capital loss.
c. The company must hold 90% active business assets for 24 consecutive months, and any unused ABIL expires completely after 10 years.
d. Selling the worthless shares directly to his spouse triggers the ABIL immediately, with no need for any s.50(1) election.

61. Maple Consulting Inc. winds up in 2026 with $300,000 in cash after paying all liabilities. Its sole shareholder, Mr. Tse, holds common shares with a paid-up capital (PUC) of $1,000 and an adjusted cost base (ACB) of $61,000 (having bought shares at a premium from a former partner). The corporation has a capital dividend account (CDA) balance of $40,000 and makes a timely s.83(2) election. What are Mr. Tse's taxable dividend and his capital loss on the shares (after any stop-loss reduction) on the wind-up?

枫叶咨询公司在 2026 年清偿所有债务后账上剩 $300,000 现金并进行清算。唯一股东谢先生持有的普通股实缴资本（PUC）为 $1,000，他个人的调整成本基础（ACB）为 $61,000（早年从退出的合伙人手里溢价买股形成）。公司资本股息账户（CDA）余额为 $40,000 并按时作了 s.83(2) 选举。谢先生在本次清算中的应税股息，以及股份上（经止损规则调整后）可认的资本损失分别是多少?

a. Taxable dividend of $199,000, using the $61,000 ACB instead of PUC, and a capital loss of $0 on the shares.
b. Taxable dividend of $299,000 and capital loss of $60,000, because the CDA balance cannot be elected during a wind-up.
c. Taxable dividend of $259,000 (plus a $40,000 tax-free capital dividend) and a capital loss of $20,000 after stop-loss.
d. Taxable capital gain of $239,000 ($300,000 cash minus the $61,000 ACB) and a deemed dividend of $0.

61′. During its 2026 wind-up, a corporation has an actual CDA balance of $40,000, but the director mistakenly files an s.83(2) capital dividend election for $50,000. What is the tax consequence under ITA s.184, and what relief is available?

在 2026 年清算过程中，一家公司的实际 CDA 余额为 $40,000，但董事误按 $50,000 递交了 s.83(2) 资本股息选举。按 ITA s.184 会产生什么税务后果，又有什么救济途径?

a. The entire $50,000 election is voided automatically, and the shareholder must include the whole $50,000 as an ordinary taxable dividend.
b. Part III tax of 3/5 of the $10,000 excess applies, unless within 90 days of assessment the excess is elected to be a taxable dividend.
c. The corporation pays a late-filing penalty of $100 per month, up to a maximum of $8,000, under the s.85(8) rules.
d. The $10,000 excess is automatically deducted from the shareholder's lifetime capital gains exemption in the following year.

62. Mr. Fang is the sole director and liquidator of a corporation winding up in 2026 with $300,000 in cash. Eager to close the books, he distributes the $300,000 to the shareholders first and plans to file the final T2 return and Form TX19 next month. What is the legal consequence under ITA s.159(2) and (3)?

方先生是一家在 2026 年清算的公司的唯一董事兼清算人，公司账上有 $300,000 现金。为尽快结账，他先把 $300,000 分给了股东，打算下个月再去报最后一张 T2 和递交 TX19 表。按 ITA s.159(2)(3) 会产生什么法律后果?

a. He is personally liable for the corporation's unpaid tax, interest and penalties, up to the $300,000 he distributed.
b. There is no personal liability for him as long as he submits Form RC145 within 30 days after distributing the cash.
c. His personal liability is capped at $8,000, the statutory maximum penalty for procedural filing errors by a director.
d. The distribution is void under corporate law, so only the CRA can sue the bank to reverse the wire transfer to shareholders.

62′. Which sequence correctly orders the mandatory steps for winding up and dissolving a corporation and closing its CRA accounts?

下列哪项正确排列了公司清算解散及关闭 CRA 账户的法定步骤顺序?

a. Distribute remaining cash to shareholders → final T2 (line 078 Yes) → apply for TX19 clearance certificate → CDA election after dissolution.
b. Close BN accounts with RC145 → apply for TX19 clearance certificate → file final T2 return (line 078 Yes) → distribute property to shareholders.
c. Apply for TX19 clearance certificate first → receive certificate → file final T2 return (line 078 Yes) → distribute property and close accounts.
d. Resolution and debts settled → final T2 (line 078 Yes) → TX19 and clearance certificate → distribute, with CDA election → RC145.

63. A corporation ceased operations in 2023 and by the end of 2024 met all four conditions under ITA s.50(1)(b) (insolvent, ceased business, shares had nil fair market value, and reasonably expected to be dissolved without resuming business). The shareholder only remembers to claim an ABIL when preparing his 2026 T1 return. How must this be handled?

一家公司在 2023 年停业，到 2024 年末同时满足了 ITA s.50(1)(b) 的四个条件（资不抵债、停止经营、股份公平市值为零、且可合理预期将解散而不会重新开业）。股东直到准备 2026 年 T1 报税表时才想起要申报 ABIL。应当如何处理?

a. He can freely make the s.50(1) election on his 2026 T1 return, because a shareholder may pick any year before formal dissolution.
b. He has lost the ABIL permanently, because a late s.50(1) election is never permitted once the 2024 filing deadline has passed.
c. 2024 was the only trigger year; he now needs a late election under s.220(3.2), within ten years and subject to a penalty.
d. He can transfer the worthless shares to his spouse in 2026 for $1 to trigger a fresh 2026 business investment loss, with no election.

63′. Instead of selling its delivery van and computers for cash before winding up under ITA s.88(2), a corporation transfers those capital assets directly to its sole shareholder on the wind-up. How does s.88(2) treat this distribution at the corporate level?

一家公司在按 ITA s.88(2) 清算前没有把送货车和电脑卖成现金，而是直接在清算时将这些资本资产过户给唯一股东。s.88(2) 在公司层面如何处理这次分配?

a. The corporation is deemed to dispose of each distributed property at its fair market value, recognizing any resulting recapture or capital gain on its final T2 return.
b. The assets roll over automatically at their undepreciated capital cost (UCC) so that neither the corporation nor the shareholder pays tax on the wind-up.
c. The corporation recognizes no gain, and the fair market value of the van and computers is taxed solely as an employment benefit on a T4 slip.
d. The transfer is ignored for tax purposes until the shareholder eventually sells the van and computers to an arm's-length buyer.

第 10 章 · 工资与应税福利 / Corporate Remuneration, Taxable Benefits & Shareholder Benefits 公司税 T2 / Corporate tax (T2)

带 ′ 的是同一考点的变式题：主题题做错时再做它。

64. Marco is the sole shareholder and president of a plumbing corporation. During 2026, the corporation paid $18,000 directly to a contractor to renovate the kitchen in Marco's personal residence and recorded the payment as a corporate repair expense. This benefit was not part of any employment compensation package offered to employees. How is this $18,000 treated for tax purposes?

Marco 是一家水暖公司的唯一股东兼总裁。2026 年期间，公司直接向承包商支付了 $18,000 用于翻修 Marco 私人住宅的厨房，并在账上记为公司维修费用。这项好处不属于提供给雇员的任何薪酬方案。这 $18,000 在税务上应如何处理?

a. It is a shareholder benefit under ITA s.15(1): the corporation cannot deduct the $18,000, and Marco must include $18,000 in his income, reported on a T4A slip under code 028.
b. It is a taxable employment benefit under ITA s.6(1)(a): the corporation can deduct the $18,000 as remuneration, and Marco reports it on a T4 slip subject to CPP and income tax withholdings.
c. It is a shareholder loan benefit under ITA s.80.4: only the prescribed interest on the $18,000 is included in Marco's income and reported on a T4A slip under code 117.
d. Because the corporation is denied the $18,000 deduction under ITA s.18(1)(a), Marco is not required to include the $18,000 in his personal income to avoid double taxation.

64′. Elena owns 100% of the shares of a consulting corporation and also works as its manager. In 2026, the corporation paid $9,500 for a luxury family vacation for Elena and her parents. No other employees receive vacation payments. What are the corporate and personal tax consequences of this $9,500 payment?

Elena 拥有一家咨询公司 100% 的股份并兼任经理。2026 年，公司支付了 $9,500 为 Elena 和她的父母购买豪华家庭度假。其他雇员均无此类度假福利。这笔 $9,500 支出的公司税与个人税后果是什么?

a. The corporation deducts the $9,500 as an employee fringe benefit, and Elena includes the $9,500 on her T4 employment slip.
b. The corporation is denied any deduction for the $9,500, and only Elena's parents are taxed on their own shares of the trip.
c. No corporate deduction (it fails the s.18(1)(a) purpose test), and Elena includes $9,500 as a s.15(1) shareholder benefit on a T4A.
d. The corporation can deduct the $9,500 if it withholds CPP, EI and income tax on that amount before the end of February 2027.

65. A British Columbia software corporation hires a senior developer in 2026 at an annual salary of $92,000. Based on the 2026 federal statutory payroll parameters, what is the total employer portion of CPP, CPP2, and EI that the corporation must pay on top of the $92,000 gross salary?

一家卑诗省软件公司在 2026 年聘用了一位高级开发人员，年薪为 $92,000。根据 2026 年联邦法定薪资参数，公司在 $92,000 毛薪之外必须承担的 CPP、CPP2 和 EI 雇主部分总额是多少?

a. $5,769.52, because the employer matches the employee's maximum deductions dollar-for-dollar across CPP, CPP2, and EI.

b. $6,218.75, consisting of $4,230.45 for CPP, $416.00 for CPP2, and $1,572.30 for EI (1.4 times the employee maximum).

c. $5,990.75, because the maximum CPP2 contribution is capped at the 2024 introductory limit of $188.00.

d. $6,427.00, because the $3,500 basic exemption does not apply once an employee's salary exceeds the $85,000 YAMPE ceiling.

65′. When comparing the 2026 federal statutory payroll deduction rules with those of 2024 and 2025 for an employee earning $90,000 per year outside Quebec, which statement is correct?

在为一位魁北克以外、年薪 $90,000 的雇员比较 2026 年与 2024、2025 年的联邦法定薪资扣款规则时，下列哪项陈述是正确的?

a. The EI rate fell to 1.63% in 2026, yet the maximum employee EI premium rose to $1,123.07 because MIE rose to $68,900.

b. Because the federal EI rate dropped to 1.63% in 2026, the maximum annual EI premium paid by both the employee and the employer is lower in 2026 than in 2024.

c. The CPP basic exemption was indexed upward in 2026 along with the $74,600 YMPE, which lowers the employee's effective CPP rate.

d. The employer's CPP2 contribution is 1.4 times the employee's $416 contribution, which matches the Employment Insurance multiplier.

66. An employer purchased an automobile for $50,000 (including taxes) and made it available to a regional sales representative for all 365 days of 2026. The employer required her to use the car for work and paid all operating expenses. During 2026, she drove a total of 50,000 km, of which 29,000 km were for business (58%) and 21,000 km were for personal use. Does she qualify for the reduced standby charge and the optional operating expense calculation (one-half of the standby charge)?

一家雇主以 $50,000（含税）购买了一辆汽车，并在 2026 年全年 365 天提供给一位区域销售代表使用。雇主要求她为工作用车并支付了全部运营费用。2026 年期间，她共行驶 50,000 公里，其中业务行驶 29,000 公里（占 58%），个人使用 21,000 公里。她是否有资格享受减免待命费以及按待命费一半计算运营费用福利的选择性算法?

a. She qualifies for both the reduced standby charge and the optional operating expense method, since business use was over half.
b. She qualifies for neither the reduced standby charge nor the optional operating expense method, since personal driving topped 20,004 km.
c. No reduced standby charge, since personal driving topped 20,004 km, but the optional half-of-standby method is still open.
d. She gets a reduced standby charge capped at 20,004/20,004, and no operating benefit arises because business driving exceeded 25,000 km.

66′. In 2026, a corporation buys a car for $45,000 (before tax) and makes it available for all 12 months to an employee who is required to use it for work. The employee drives 22,000 km in total during 2026: 10,000 km for business (45%) and 12,000 km for personal use. How are the standby charge and operating expense benefit determined for 2026?

2026 年，一家公司以 $45,000（税前）买入一辆车，全年 12 个月提供给一位因工作需要用车的雇员。该雇员 2026 年共行驶 22,000 公里：业务 10,000 公里（45%），个人 12,000 公里。2026 年的待命费和运营费用福利应如何确定?

a. The standby charge is cut to 12,000/20,004 of 2% × $45,000 × 12, and the operating benefit is 12,000 km × 34¢.
b. Business use is not over half, so no reduction and no optional method: full $10,800 standby charge, and 34¢ × 12,000 km ($4,080).
c. He may still elect the optional method of $5,400 (half the $10,800 standby charge), as it is lower than the fixed-rate amount.
d. Both benefits are subject to CPP, EI and income tax source deductions, and both are reported on the employee's T4 slip.

67. In February 2026, an engineering firm in British Columbia buys a new non-zero-emission passenger vehicle for $52,000 (before tax) and also reimburses an arm's length engineer who drives her own personal car 6,000 km on firm business during 2026. Which statement accurately states the 2026 federal rules for these two situations?

2026 年 2 月，卑诗省一家工程公司以 $52,000（税前）新购入一辆非零排放乘用车，同时为一位在 2026 年开私家车为公司出差 6,000 公里的公平交易工程师发放里程补贴。哪项陈述准确说明了这两种情形在 2026 年的联邦规则?

a. The Class 10.1 cap is $39,000 as announced (ITR text still reads $38,000); the allowance limit is 73¢ for 5,000 km, then 67¢.

b. The Class 10.1 CCA ceiling is $61,000, and the engineer's reimbursement is capped at 34 cents per kilometre for all 6,000 km driven.

c. The Class 10.1 CCA ceiling is $39,000, and the provincial tax-free per-kilometre allowance is 77 cents for the first 5,000 km and 71 cents thereafter.

d. The engineer must include 34 cents per kilometre in her T4 income for the 6,000 km driven, while the firm can deduct up to $1,100 per month in CCA.

67′. Which of the following correctly pairs a 2026 federal automobile parameter with its tax mechanism?

下列哪一项正确配对了 2026 年联邦车辆参数及其税务机制?

a. 73 cents / 67 cents per km: the rate used to calculate the taxable operating expense benefit when an employee drives a company car for personal use.

b. $61,000: the maximum monthly deductible lease cost for a non-zero-emission passenger vehicle.

c. 34 cents per km: the tax-free allowance rate an employer pays an automobile salesperson for driving a personal vehicle.

d. $1,100 per month (before tax) and $350 per month: the respective ceilings on deductible lease costs and deductible car loan interest for a passenger vehicle in 2026.

68. Riverview Hardware Ltd. has a December 31, 2026 taxation year-end. In December 2026, it accrued a $50,000 bonus to its sole shareholder-employee, Chen, and paid the bonus on July 15, 2027. Also in December 2026, the company gave two non-cash holiday gift baskets worth $450 each—one to Chen and one to an arm's length store clerk who received no other gifts in 2026. What is the correct tax treatment?

Riverview Hardware Ltd. 的税年结束日为 2026 年 12 月 31 日。2026 年 12 月，公司向其唯一股东兼雇员 Chen 计提了一笔 $50,000 的奖金，并于 2027 年 7 月 15 日实际支付。同样在 2026 年 12 月，公司送出两份各值 $450 的非现金节日礼篮——一份给 Chen，一份给 2026 年未收到其他礼品的公平交易店员。正确的税务处理是什么?

a. The $50,000 bonus is deductible in 2026 because it was paid in 2027, and both $450 gift baskets are tax-free under the $500 non-cash gift policy.

b. The bonus is deductible only in 2027, since it was paid after June 29, 2027; the clerk's gift is tax-free but Chen's is fully taxable.

c. The $50,000 bonus is deductible in 2026 because the deadline is six calendar months plus 30 days, while both $450 gift baskets are fully taxable.

d. The $50,000 bonus is non-deductible in both 2026 and 2027 once the 180-day deadline is missed, and Chen's $450 gift is tax-free up to $500.

68′. In 2026, a corporation gives three items to an arm's length employee who has worked there for exactly five years (and never received a service award before): a $400 non-cash birthday gift, a $450 non-cash 5-year long-service plaque and watch, and a $200 cash bonus card. It also gives a $300 non-cash holiday gift to the sole shareholder's spouse who works part-time as a bookkeeper. Which items are taxable benefits in 2026?

2026 年，一家公司向一位工作满五年（且此前从未拿过服务奖）的公平交易雇员发放了三样东西：一份价值 $400 的非现金生日礼物、一份价值 $450 的非现金五周年长期服务奖牌与手表，以及一张 $200 的现金奖励卡。公司还向兼职做记账的唯一股东配偶送了一份价值 $300 的非现金节日礼物。2026 年哪些项目属于应税福利?

a. Only the $200 cash bonus card and the $350 excess of the combined $850 non-cash items given to the arm's length employee are taxable; the spouse's $300 gift is tax-free.

b. All four items are fully taxable because an employer cannot combine the annual gift policy and the long-service award policy in one calendar year.

c. Only the $200 cash bonus card is taxable, because each of the three non-cash gifts is under the $500 threshold, including the spouse's gift.

d. The arm's length employee's $400 gift and $450 service award are tax-free; the $200 cash card and the spouse's $300 gift are taxable.

69. Company X had an average monthly withholding amount (AMWA) of $2,400 two calendar years ago and $2,600 last year. It has paid all payroll deductions on time for the past 12 months, but it filed its quarterly GST/HST return three weeks late four months ago. Separately, Company Y is associated with Company Z; two calendar years ago, Company Y had an AMWA of $4,000 and Company Z had an AMWA of $23,000. Which statement correctly identifies their remitter categories?

X 公司两个日历年前的月均预扣额（AMWA）为 $2,400，去年为 $2,600。过去 12 个月它按时缴纳了所有薪资扣款，但四个月前它的季度 GST/HST 申报迟交了三周。另外，Y 公司与 Z 公司联营；两个日历年前，Y 公司的 AMWA 为 $4,000，Z 公司的 AMWA 为 $23,000。哪项陈述正确认定了它们的汇款人档次?

a. Company X qualifies as a quarterly remitter because all its payroll remittances were on time, and Company Y is a regular remitter because its own AMWA is under $25,000.

b. If Company X remits a $5,000 payroll deduction five days late for the first time, it faces a flat 10% failure-to-deduct penalty of $500 on the whole amount.

c. Company X is a quarterly remitter, while Company Y and Company Z are Threshold 2 accelerated remitters who must remit four times a month through a financial institution.

d. X loses quarterly status because its late GST/HST filing breaks the perfect compliance history; Y and Z, with combined AMWA of $27,000, are Threshold 1 remitters.

69′. An employer deducted $10,500 in CPP, EI, and income tax from its employees' paycheques in May 2026 (its first offence and not due to gross negligence), but remitted the $10,500 to the CRA six days after the due date. What is the federal late remittance penalty rule for this delay?

一家雇主在 2026 年 5 月从雇员薪水中扣下了 $10,500 的 CPP、EI 和所得税（属首次违规且非严重疏忽），但在到期日之后第 6 天才将这 $10,500 上缴给 CRA。针对这次延误的联邦迟缴罚则是什么?

a. 7% of the amount above $500, since the late remittance tiers are 3%, 5%, 7% and 10% by days late.

b. 10% on the full $10,500, applied immediately from the first day after the remittance due date.

c. 3% on the full $10,500, because every remittance made within seven days is penalized at a flat 3%.

d. 20% on the full $10,500, because source deductions are held in trust for the Crown and were not remitted.

70. Westcoast Design Ltd. is a regular (non-charitable) employer in British Columbia with no associated corporations. For the 2026 calendar year, its total BC remuneration is $1,300,000. What is its 2026 BC Employer Health Tax (EHT), and how would the EHT change if its sole shareholder also controlled a second BC corporation with $400,000 of 2026 BC remuneration?

Westcoast Design Ltd. 是卑诗省的一家一般（非慈善）雇主，没有联营公司。2026 日历年其 BC 薪酬总额为 $1,300,000。它 2026 年的 BC 雇主健康税（EHT）是多少？如果其唯一股东同时控制另一家 2026 年 BC 薪酬为 $400,000 的 BC 公司，EHT 会如何变化？

a. Standalone EHT is $5,850 (1.95% × $300,000); if associated, the second corporation still pays $0 because its own $400,000 payroll is under the $1,000,000 exemption.
b. Standalone EHT is $25,350 (1.95% × $1,300,000); if associated, the two corporations simply share one $1,000,000 exemption between them and pay 5.85% on the rest.
c. Standalone EHT is $17,550 (5.85% × $300,000); if associated, combined payroll of $1,700,000 removes the exemption, so each pays 1.95% on its full payroll.
d. Standalone EHT is $17,550; if associated, the $1,000,000 exemption is still kept and split between them because neither corporation alone exceeded $1,500,000.

70′. Why does British Columbia's Employer Health Tax (EHT) apply a 5.85% notch rate to a regular employer's BC remuneration between $1,000,000.01 and $1,500,000, while applying 1.95% to total remuneration once payroll exceeds $1,500,000?

为什么卑诗省的雇主健康税（EHT）对一般雇主在 $1,000,000.01 至 $1,500,000 之间的 BC 薪酬适用 5.85% 的缺口费率，而在薪酬超过 $1,500,000 后改对全额薪酬适用 1.95%？

a. The 5.85% notch rate phases out the exemption so that at $1,500,000 both formulas give the same $29,250, with no cliff.
b. Employers with payroll over $1,500,000 still keep the $1,000,000 exemption and pay 1.95% only on the part above $1,500,000.
c. 5.85% is the rate for regular employers, while 1.95% is reserved exclusively for registered charities and non-profit organizations.
d. The first $500,000 above $1,000,000 includes federal CPP and EI remittances, which are deducted once payroll exceeds $1,500,000.

第 11 章 · 非营利与免税 / Tax-Exempt & Non-Profit Organizations (T2, T1044 & T3) 公司税 T2 / Corporate tax (T2)

带 ′ 的是同一考点的变式题：主题题做错时再做它。

71. A newly formed neighbourhood heritage society is incorporated as a non-share-capital corporation and operates exclusively for civic improvement under ITA s.149(1)(l). It is not a registered charity. A local business owner offers a donation and asks for an official tax receipt, while the society's treasurer believes the society never needs to register with the CRA or file any tax return because it owes no tax. Which statement is correct?

一家新成立的社区历史文化社团注册为无股本非营利公司，并按 ITA s.149(1)(l) 专为公民改善目的运营，不属于注册慈善机构。一位本地企业主表示愿意捐款并索要正式抵税收据，而社团财务主管认为社团既然不欠税，就既不需要向 CRA 注册，也永远不用交任何申报表。下列哪项说法正确?

a. The society does not need to register to be tax-exempt under s.149(1)(l), cannot issue official donation receipts, and must still file a T2 return every tax year as a corporation

b. The society must first apply to the CRA for non-profit registration before its income becomes exempt, after which it may issue official donation receipts

c. The society cannot issue official donation receipts, and like a registered charity it is completely exempt from filing a T2 return as long as it has zero tax payable

d. Once the society's articles state a non-profit purpose, its tax-exempt status is permanently guaranteed and it may issue receipts for membership dues

71′. Compare an incorporated registered charity under ITA s.149(1)(f) with an incorporated non-profit organization (NPO) under ITA s.149(1)(l), assuming neither has any tax payable for the year. How do their rules differ regarding official donation receipts and annual T2 returns?

对比一家符合 ITA s.149(1)(f) 的公司制注册慈善机构与一家符合 ITA s.149(1)(l) 的公司制非营利组织（假设两者当年应纳税额均为零）。它们在开具正式捐赠收据和年度 T2 申报义务上有何不同?

a. Both organizations may issue official donation receipts, and neither has to file a T2 return in any year when its tax payable is zero

b. Neither organization needs CRA registration to be exempt, and both must file a T2 return within 6 months of their tax year-end

c. Only the registered charity may issue donation receipts and skip the T2; the incorporated NPO cannot receipt and must file a T2 yearly

d. The incorporated NPO is exempt from filing a T2 return, whereas the registered charity must file both a T2 return and Form T1044 each year

72. An incorporated community sports association exempt under ITA s.149(1)(l) has never previously been required to file Form T1044. Its total assets had a GAAP book value of $150,000 at the end of the prior fiscal period and $198,000 at the end of the current fiscal period. During the current fiscal period, it received $610,000 in membership dues and government grants, $7,000 in rental income, and $3,500 in bank interest. Must it file Form T1044 for the current fiscal period?

一家按 ITA s.149(1)(l) 免税的社区体育协会公司此前从未触发过 T1044 申报义务。其上一会计期末按 GAAP 计算的总资产账面价值为 $150,000，本会计期末为 $198,000。在本会计期内，该协会收到会费与政府拨款共 $610,000、租金收入 $7,000 以及银行利息 $3,500。它本会计期是否必须申报 T1044?

a. No, because neither its rental income ($7,000) nor its interest income ($3,500) individually exceeds the $10,000 threshold
b. Yes, because its combined rental income ($7,000) and interest income ($3,500) exceed the $10,000 passive income threshold
c. Yes, but only because its membership dues and grants of $610,000 push total revenue over $200,000
d. No, because its prior-period total assets of $150,000 and current-period assets of $198,000 are both below $200,000

72′. A non-profit alumni association exempt under ITA s.149(1)(l) has never filed Form T1044 before. Its total assets were $150,000 at the end of the prior fiscal period and $198,000 at the end of the current fiscal period. During the current period, it collected $340,000 in membership dues and fundraising event proceeds, plus $3,000 in bank interest and $3,500 in rental income. Which return(s) must the incorporated association file for the current period?

一家按 ITA s.149(1)(l) 免税的非营利校友会公司此前从未报过 T1044。其上一会计期末总资产为 $150,000，本会计期末为 $198,000。本期内该会收取会费与筹款活动收入共 $340,000，另加银行利息 $3,000 和租金收入 $3,500。该校友会公司本期必须提交哪份（或哪些）申报表?

a. Both a T2 return and Form T1044, because its total receipts including membership dues and event proceeds exceed the $10,000 threshold
b. Neither a T2 return nor Form T1044, because it is a tax-exempt organization and falls below all three of the s.149(12) filing thresholds
c. Form T1044 only, because its current-period assets of $198,000 are close to the $200,000 threshold and an NPO never files a T2 return
d. A T2 (or T2 Short Return) only: the four passive items total under $10,000, prior assets were under $200,000, and it never filed a T1044

73. A residential condominium corporation had $480,000 in total assets at the end of 2025 and earned $14,200 in interest in 2025, properly filing Form T1044 for 2025. After major roof repairs in 2026, its total assets fell to $150,000 at the end of 2026, and its interest income dropped to $3,000 in both 2026 and 2027, with assets remaining at $150,000. What is its Form T1044 filing obligation for 2026 and 2027?

一家住宅共管公寓管理公司在 2025 年末拥有总资产 $480,000，2025 年利息收入为 $14,200，并已按规提交了 2025 年的 T1044。2026 年因大修屋顶，其 2026 年末总资产降至 $150,000，且 2026 年与 2027 年的利息收入均降至 $3,000，资产维持在 $150,000。它在 2026 年和 2027 年的 T1044 申报义务是什么?

a. It does not need to file Form T1044 for either 2026 or 2027 because both its assets and passive income fell below the thresholds starting in 2026
b. It must file Form T1044 for 2026 because 2025 year–end assets exceeded $200,000, but it may stop filing in 2027 once 2026 year–end assets are $150,000
c. It must file Form T1044 for both 2026 and 2027 (and every future fiscal period as long as it remains an NPO) because of the prior–period asset test and the ratchet rule
d. It is exempt from Form T1044 in all years because residential condominium corporations are excluded under s.149(1)(i)

73′. Which of the following tax–exempt entities is required to file Form T1044 if its prior fiscal period–end total assets had a GAAP book value of $350,000?

如果下列免税主体在上一会计期末按公认会计原则计算的账面总资产均为 $350,000，哪一个主体必须提交 T1044?

a. A registered charity exempt under ITA s.149(1)(f)
b. A residential condominium corporation exempt as a non–profit organization under ITA s.149(1)(l)
c. A corporation exempt under ITA s.149(1)(i) that operates solely to provide low–cost housing for the aged
d. A registered Canadian amateur athletic association

74. An incorporated golf and dining club exempt under ITA s.149(1)(l) has the main purpose of providing dining and sporting facilities to its members. In 2026, it collected $2,100,000 in membership dues, $340,000 in dining revenue, and $58,000 in interest and dividends from an investment account, and it realized a $600,000 capital gain from selling a parcel of idle land that was never used for the golf course or restaurant. How is the club taxed and which return(s) must it file for 2026?

一家按 ITA s.149(1)(l) 免税的高尔夫与餐饮俱乐部公司，主要目的是为会员提供餐饮与体育设施。2026 年该会收取会费 $2,100,000、餐饮收入 $340,000，投资账户产生利息与股息合计 $58,000，并因出售一块从未用于球场或餐厅的闲置土地实现资本利得 $600,000。该俱乐部在 2026 年应如何课税并提交哪些申报表?

a. All of its revenue and capital gains are completely exempt under s.149(1)(l), so the club only needs to file a nil T2 return together with Form T1044 for the year
b. Because s.149(5) applies, the club loses its s.149(1)(l) status entirely and must report the $2,100,000 dues, $340,000 dining revenue, $58,000 investment income, and $600,000 gain on its T2 return
c. Dues and dining revenue stay exempt; the $58,000 property income and the gain on the idle land are taxed in a deemed trust on a T3; it files T2, T1044 and T3
d. Only the $58,000 of interest and dividend income is taxed on a T3 return, because every capital gain on real estate owned by an NPO club remains fully exempt

74′. Suppose the same incorporated golf and dining club sold a parcel of land that had been used exclusively as the parking lot for members using the golf course and dining room, realizing a $600,000 capital gain, while also earning $58,000 in investment interest and dividends. Under ITA s.149(5), what is taxable on the club's T3 trust return?

假设同一家高尔夫与餐饮俱乐部公司出售了一块一直专供球场与餐厅会员使用的停车场用地，实现资本利得 $600,000，同时取得投资利息与股息 $58,000。根据 ITA s.149(5)，哪些所得需要在该俱乐部的 T3 信托申报表上纳税?

a. Only the $58,000 in investment interest and dividends, because the parking lot land was property used exclusively to provide the dining and sporting services
b. Both the $58,000 investment income and the taxable capital gain on the $600,000 parking lot sale, because all real property held by a s.149(5) club is taxed on disposition
c. Only the taxable capital gain on the $600,000 parking lot sale, because investment interest is exempt if held for future course maintenance
d. Neither amount is taxed on a T3 return if the club changes its name to a Cultural Heritage Association while continuing to operate mainly as a member restaurant and golf club

75. An incorporated non-profit organization that validly qualifies for tax exemption under ITA s.149(1)(l) and has $0 tax payable discovers that both its T2 return and its Form T1044 are overdue due to circumstances beyond its control. How are the late-filing penalties calculated for the two forms, and what should the organization do first regarding Form T1044?

一家符合 ITA s.149(1)(l) 免税条件且应纳税额为 $0 的非营利公司发现，由于不可控原因，其 T2 申报表和 T1044 均已逾期。这两份表的迟报罚款分别如何计算？针对 T1044，该组织首先应该怎么做？

a. Both the T2 and the T1044 are penalized at $25 per day up to $2,500 each, so the organization should wait for CRA approval of a relief request before filing either form
b. Both the T2 and the T1044 penalties are based on unpaid tax at the filing deadline (5% plus 1% per month), so the organization owes a $0 penalty on both forms
c. The T2 penalty is 10% plus 2% per month of total assets, while the T1044 penalty is a flat $100 no matter how many days late it is filed, so filing order does not matter
d. The T2 penalty is $0, being based on unpaid tax; the T1044 penalty is $25 a day ($100 to $2,500), so file the T1044 now and attach a relief request

75′. An incorporated association claimed tax-exempt status under ITA s.149(1)(l) and filed its T2 return 12 complete months late, assuming the penalty would be $0 because it reported zero tax. Upon audit within the normal reassessment period, the CRA determines that the association actually operated for profit and made income available for members' personal benefit during that year. What is the tax and penalty consequence?

一家协会公司自称符合 ITA s.149(1)(l) 免税身份，在提交 T2 申报表时迟交了整整 12 个月，以为申报零税额就不会有罚款。在正常复评期内的审计中，CRA 认定该协会当年实际上为盈利而运营且让收入供成员个人受益。这会产生什么税务与罚款后果？

a. Loss of exempt status applies only prospectively to future years, so the late T2 penalty for the audited year stays at $0 and no tax is reassessed for that year
b. Exempt status can be denied for that year: income is taxed at regular rates, with daily compound interest and the s.162(1) late-filing penalty on the unpaid tax
c. The association is only subject to the $2,500 maximum Form T1044 penalty, which replaces corporate income tax whenever an NPO fails the operational test in a year
d. Because its articles of incorporation still state a non-profit purpose, the CRA cannot reassess corporate tax for that year unless the articles were formally amended

76. A social services organization exempt under ITA s.149(1)(l) has a total 2026 BC calendar-year payroll of $2,600,000, split evenly ($1,300,000 each) between two separate office buildings—one in Richmond and one in Vancouver—that it leases and uses exclusively. What is its 2026 BC Employer Health Tax (EHT) payable, and what would the tax be if both divisions were instead on different floors of the same building?

一家按 ITA s.149(1)(l) 免税的社区服务机构，2026 日历年的 BC 薪酬总额为 $2,600,000，平均分布在列治文和温哥华两处各自独立租用且排他使用的办公楼（每处薪酬各 $1,300,000）。它 2026 年应缴的 BC 雇主健康税（EHT）是多少？如果这两个部门改为设在同一栋楼的不同楼层，应缴税额又会是多少？

a. $0 when operating in two separate qualifying locations ($1,500,000 exemption per location), and $32,175 when operating in the same building (2.925% × ($2,600,000 − $1,500,000))
b. $50,700 in both cases, calculated at the 1.95% rate on the full $2,600,000 payroll because total payroll exceeds $1,500,000
c. $32,175 in both cases, because a single legal entity can claim only one $1,500,000 EHT exemption across British Columbia regardless of how many locations it operates
d. $0 in both cases, because each floor of an office building counts as a separate qualifying location as long as it has its own department manager

76′. How do the BC Employer Health Tax (EHT) rules for a charitable or non-profit employer compare with the rules for a general for-profit employer?

慈善或非营利雇主适用的 BC 雇主健康税（EHT）规则与一般营利雇主的规则相比有何不同？

a. Both kinds of employer receive the same $1,000,000 exemption, but non-profit employers pay a 1.95% notch rate on the excess instead of 5.85%
b. Non-profits get $1,500,000 per qualifying location, a 2.925% notch rate up to $4,500,000, and need not share the exemption with associated employers
c. Non-profit employers are completely exempt from BC EHT regardless of payroll size, as long as they file Form T1044 federally each year
d. Non-profit employers receive a single $4,500,000 exemption, which must be shared among all of the associated employers in their group

77. At the end of its fiscal period, a non-profit association is performing its annual four-step compliance review to check its ITA s.149(1)(l) status and Form T1044 requirement. When testing the $200,000 asset threshold and the $10,000 passive income threshold under s.149(12), which accounting bases must it use?

在会计期结束时，一家非营利协会正在进行年度四步合规自检，以核实其 ITA s.149(1)(l) 身份及 T1044 申报义务。在测试 s.149(12) 下的 $200,000 资产门槛与 $10,000 被动收入门槛时，该协会必须采用什么会计计量口径?

a. Current fiscal period-end fair market value for total assets, and only the cash actually received during the period for the passive income items
b. Prior period-end GAAP book value for total assets, and amounts received or receivable in the current period for the four passive income items
c. Prior fiscal period-end appraised replacement value for real estate only, and gross revenue from all sources including membership fees and grants
d. Average monthly asset balances during the current period, and net investment income after deducting all management and custody expenses

77′. Why must an organization claiming exemption under ITA s.149(1)(l) review its operations at the end of every fiscal period rather than relying on its initial articles of incorporation?

为什么主张按 ITA s.149(1)(l) 免税的组织必须在每个会计期结束时复核其实际运营情况，而不能仅凭最初的公司章程高枕无忧?

a. Because s.149(1)(l) requires the organization to renew a non-profit registration number with the CRA every 12 months
b. Because the $10,000 and $200,000 thresholds in s.149(12) are adjusted for inflation at the end of every calendar year
c. Because exempt status turns on being both organized and operated for non-profit purposes, a fact decided year by year
d. Because any organization whose fiscal period exceeds 6 months automatically converts into a deemed inter vivos trust under s.149(5)

第 12 章 · 财务报表、GIFI 与附表 / Financial Statements, GIFI, and Schedule 1 Tax Reconciliation 公司税 T2 / Corporate tax (T2)

带 ′ 的是同一考点的变式题：主题题做错时再做它。

78. An engineering firm with a December 31, 2026 year-end reports net profit after tax of $180,000 on its financial statements (GIFI code 9999). In arriving at that profit, the bookkeeper deducted all of the following expenses: book depreciation of $42,000; client meals and entertainment of $16,000; annual golf club membership dues for a director of $9,500; an increase in the accounting allowance for doubtful accounts of $8,000; charitable donations to registered charities of $5,000; and book income tax expense of $38,000. Schedule 8 capital cost allowance (CCA) for the year is $55,000. What are the firm's net income for tax purposes (Schedule 1 result) and taxable income for 2026?

一家年结日为 2026 年 12 月 31 日的工程公司，其财务报表上的税后净利润（GIFI 代码 9999）为 $180,000。在计算该账面利润时，记账员已经扣除了以下全部项目：账面折旧 $42,000；客户餐饮与娱乐费 $16,000；一位董事的高尔夫俱乐部年费 $9,500；会计坏账准备增加额 $8,000；向注册慈善机构的慈善捐赠 $5,000；以及账面所得税费用 $38,000。当年按 Schedule 8 算出的资本成本折让（CCA）为 $55,000。该公司 2026 年的税务净收入（Schedule 1 结果）和应税收入分别是多少?

a. Net income for tax purposes of $230,500 and taxable income of $225,500.

b. Net income for tax purposes of $235,500 and taxable income of $230,500.

c. Net income for tax purposes of $230,750 and taxable income of $225,750.

d. Net income for tax purposes of $197,500 and taxable income of $192,500.

78′. A logistics consultancy with a December 31, 2026 year-end begins its Schedule 1 with net profit after tax of $180,000 in Amount A. Its income statement includes deductions for $42,000 of book amortization, $16,000 of client meals and entertainment, $9,500 of yacht and golf club dues, an $8,000 addition to a general bad debt reserve, $5,000 of charitable donations, and $38,000 of income tax expense. After claiming $55,000 of CCA from Schedule 8, how much total additions must be added back on Schedule 1, and what is the resulting net income for tax purposes before deducting charitable donations to arrive at taxable income?

一家年结日为 2026 年 12 月 31 日的物流咨询公司，以税后净利润 $180,000 作为 Schedule 1 金额 A 的起点。其损益表已扣除以下费用：账面摊销 $42,000、客户餐饮娱乐费 $16,000、游艇及高尔夫俱乐部会费 $9,500、一般坏账准备增加额 $8,000、慈善捐赠 $5,000 以及所得税费用 $38,000。在扣除来自 Schedule 8 的 $55,000 资本成本折让（CCA）后，Schedule 1 上的加回项合计是多少？在扣除慈善捐赠得出应税收入之前的税务净收入又是多少?

a. Total Schedule 1 additions of $105,500 and net income for tax purposes of $230,500.

b. Total Schedule 1 additions of $105,750 and net income for tax purposes of $230,750.

c. Total Schedule 1 additions of $110,500 and net income for tax purposes of $235,500.

d. Total Schedule 1 additions of $118,500 and net income for tax purposes of $243,500.

79. Which of the following statements accurately describes the General Index of Financial Information (GIFI) rules for a 2026 corporate tax return?

下列哪项陈述准确描述了 2026 税年公司所得税申报表中关于财务信息通用索引（GIFI）的规则?

a. With 40 line items it must report 40 GIFI codes, not subtotals, and enter 0 for any nil validity check item such as 2599 or 9999.

b. A corporation filing with GIFI must still attach its traditional financial statements unless it is an insurer involved in underwriting.

c. A corporation using tax software may file the paper GIFI–Short (T1178) if either its gross revenue or its total assets is under $1,000,000.

d. Items with no exact GIFI match go into the block's total code, and validity check codes with a nil balance may be left blank.

79′. A newly incorporated retail business is preparing its first T2 return for the 2026 tax year without using tax preparation software. Both its gross revenue and its total assets are under $1,000,000. Which combination of GIFI forms and reporting rules applies to this corporation?

一家新成立的零售公司正在不使用报税软件的情况下编制其 2026 税年的首份 T2 申报表，其总收入与总资产各自均低于 $1,000,000。下列哪组 GIFI 表格与填报规则适用于该公司?

a. It is exempt from GIFI because its revenue and assets are each under $1,000,000, so it only needs to mail traditional paper statements.

b. It must file electronically using only the seven validity check subtotal codes and omit Schedule 101 because opening balances are always zero.

c. It only needs to complete Schedule 141 if its financial statements were audited by an external accountant holding a professional designation.

d. It may use the paper GIFI–Short (T1178), must add Schedule 101 for its opening balance sheet, and must enter 0 for nil check items.

80. Under the Income Tax Act rules governing Schedule 1 adjustments in 2026, how do the deductibility limits compare across: (1) regular client meals and entertainment, (2) meals of a long-haul truck driver during an eligible travel period, (3) qualifying meals provided at a temporary work site camp, and (4) membership dues at a recreational or dining club?

根据 2026 税年规管 Schedule 1 调整的《所得税法》规则，以下四项支出的可扣除比例分别是多少：(1) 普通客户餐饮与娱乐费、(2) 长途货运司机在合格出差期间的餐费、(3) 在符合条件的临时工地营地提供的餐食、(4) 康乐或餐饮俱乐部的会员年费?

a. 50% for regular meals; 80% for long-haul truck driver meals; 50% for work site camp meals; 50% for club membership dues.
b. 50% for regular meals; 100% for long-haul truck driver meals; 80% for work site camp meals; 0% for club membership dues.
c. 50% for regular meals; 80% for long-haul truck driver meals; 100% for work site camp meals; 0% for club membership dues.
d. 0% for regular meals; 50% for long-haul truck driver meals; 80% for work site camp meals; 0% for club membership dues.

80′. A freight and construction company recorded three expenses on its 2026 income statement: (1) meals incurred by its long-haul truck drivers during eligible travel periods, (2) annual fees to maintain a lodge and golf facility used to entertain clients, and (3) qualifying meals provided to workers at a remote temporary work site camp. What portion of each expense must be added back on Schedule 1?

一家货运与建筑公司在 2026 年损益表上记录了三项开支：(1) 长途货运司机在合格出差期间发生的餐费、(2) 用于招待客户的旅舍及高尔夫球场维护年费、(3) 在偏远临时工地营地向工人提供的合格餐食。这三项开支在 Schedule 1 上分别需要加回多少比例?

a. Add back 20% of the long-haul truck driver meals, 100% of the lodge and golf facility fees, and 0% of the qualifying temporary work site camp meals.
b. Add back 80% of the long-haul truck driver meals, 50% of the lodge and golf facility fees, and 50% of the temporary work site camp meals.
c. Add back 50% of the long-haul truck driver meals, 100% of the lodge and golf facility fees, and 50% of the temporary work site camp meals.
d. Add back 20% of the long-haul truck driver meals, 50% of the lodge and golf facility fees, and 100% of the temporary work site camp meals.

81. In March 2026, a manufacturing corporation purchases and places into use a new piece of manufacturing and processing machinery (Class 53, or assessed under Class 43 after 2025 where it would have been Class 53 if acquired in 2025) for $200,000. Under the current 2026 rules in the T2 Guide, how much first-year capital cost allowance (CCA) can the corporation claim on this machine, and when does the phase-out begin for this category?

2026 年 3 月，一家制造公司花 $200,000 购置并投入使用一台全新的货物制造加工机器（53 类，或 2025 年之后取得按 43 类判、若在 2025 年取得会归入 53 类的）。根据 2026 税年现行 T2 指南规则，该公司在第一年可以就这台机器申报多少资本成本折让（CCA）？该类别的退坡从什么时候开始?

a. It cannot claim immediate expensing because the 2018 Accelerated Investment Incentive (AII) 50% net addition ended before 2024 and completely phases out before 2028.
b. It can claim 100% immediate expensing of $200,000 in 2026, and the phase-out for this manufacturing and processing machinery category only begins for property that becomes available for use after 2029.
c. It can claim 100% immediate expensing of $200,000 in 2026, but the 100% deduction for manufacturing machinery expires for property becoming available for use after 2026 (before 2027).
d. It is limited by the half-year rule under Regulation 1100(2) because reaccelerated investment incentive property (RIIP) only applies to property acquired after 2030.

81′. Which of the following correctly contrasts the 2026 current rules for capital cost allowance (CCA) incentives and Class 10.1 passenger vehicle limits against outdated or unlegislated figures?

下列哪项正确对比了 2026 税年关于资本成本折让（CCA）激励措施及 10.1 类乘用车上限的现行规则与过期或尚未入法的数字?

a. Class 44/46/50 property acquired after April 15, 2024 gets 100% if available before 2027; the $39,000 Class 10.1 cap is announced, not yet in ITR s.7307(1).
b. Productivity assets in Classes 44, 46, and 50 retain 100% immediate expensing until 2034, and $39,000 is already enacted in the consolidated text of ITR s.7307(1).
c. Clean energy equipment (Class 43.1) loses its 100% first-year deduction after 2026, while the 2018 All parameters (available for use before 2028) remain the active rule for 2026 returns.
d. Property acquired from a non-arm's length person on a tax-deferred rollover qualifies as RIIP as long as it is placed in use before 2030.

82. For a corporation completing Schedule 6 and Schedule 1 for the 2026 tax year, how are capital gains included in net income for tax purposes under current rules?

对于正在编制 2026 税年 Schedule 6 与 Schedule 1 的公司，按现行规则，资本利得应当如何计入税务净收入？

a. Two-thirds (2/3) of the capital gain on Schedule 6 is entered on Schedule 1 line 113 because the proposed increase took effect on January 1, 2026.

b. One-half of a regular gain goes to Amount R and line 113; eligible gifts of listed securities generally get 0%, and some s.100(1) dispositions 100%.

c. One-half (1/2) of the capital gain is deducted on Schedule 1 line 401, while the full accounting gain on disposal remains inside GIFI code 9999 without adjustment.

d. Dispositions of partnership interests under s.100(1) where all partnership assets are inventory or depreciable property qualify for a 0% inclusion rate on Schedule 6.

82′. In 2026, a corporation disposes of an interest in a partnership whose assets consist entirely of inventory and depreciable property (with no exception applying under s.100(1)), and in the same year it donates qualifying securities to an eligible donee without receiving any advantage. What capital gain inclusion rates apply to these two transactions, and what is the standard corporate capital gain inclusion rate in 2026?

2026 年，一家公司处置了一项合伙企业权益，该合伙企业的资产全部由存货和可折旧财产组成（且不适用 s.100(1) 下的例外）；同年，该公司向合格受赠人捐赠了符合条件的特定证券且未取得任何利益或好处。这两笔交易分别适用什么资本利得纳入率？2026 年公司的标准资本利得纳入率又是多少？

a. 100% inclusion for the s.100(1) partnership interest disposition, 0% inclusion for the donated securities, and a 2/3 standard corporate inclusion rate.

b. 0% inclusion for the s.100(1) partnership interest disposition, 100% inclusion for the donated securities, and a 1/2 standard corporate inclusion rate.

c. 50% inclusion for both special transactions because all special inclusion rates were repealed in 2026, and a 1/2 standard corporate inclusion rate.

d. 100% for the s.100(1) partnership interest disposition, 0% for the donated securities, and a one-half standard corporate inclusion rate.

83. A corporation is a member of a partnership and also records an accounting warranty reserve on its financial statements. During the 2026 tax year, the partnership allocates a share of taxable capital gains to the corporation. Where must the partnership's allocated taxable capital gains and the corporation's accounting warranty reserve be reported on the T2 return?

一家公司是某合伙企业的成员，同时在其财务报表上记录了一笔会计保修准备金。在 2026 税年，该合伙企业向该公司分配了应税资本利得份额。合伙企业分来的应税资本利得以及公司财报上的会计保修准备金，应当分别填报在 T2 申报表的哪个位置?

a. Report the partnership's allocated taxable capital gains on Schedule 1 line 129, and report the opening and closing accounting warranty reserve on Schedule 13.
b. Report the partnership's allocated taxable capital gains on the corporation's own Schedule 6, and report the opening and closing accounting warranty reserve on Schedule 13.
c. Report the partnership's allocated taxable capital gains on Schedule 1 line 129, and report the opening and closing accounting warranty reserve on lines 414 and 126 of Schedule 1.
d. The partnership capital gains go on the corporation's own Schedule 6; the accounting warranty reserve goes on Schedule 1 lines 414 and 126.

83′. Which statement correctly matches the T2 auxiliary schedule to its specific reporting rule for the 2026 tax year?

下列哪项陈述正确匹配了 2026 税年 T2 附属附表及其具体填报规则?

a. Schedule 13 is used to reconcile all accounting reserves from the financial statements, while tax-permitted reserves are entered directly on lines 414 and 126 of Schedule 1.
b. Schedule 8 shows RIIP and legacy AII property in separate columns, and a partner's share of partnership capital gains goes to Schedule 6.
c. Schedule 73 is used to claim patronage dividend deductions, while Schedule 16 summarizes a corporate partner's partnership income inclusions.
d. Unlabeled additions on Schedule 1 are reported on page 4 columns 705 and 395 and line 396, while unlabeled deductions are reported on page 3 columns 605 and 295 and line 296.

84. Which of the following accurately describes the role of Schedule 141, financial statement notes, and provincial corporate tax computation in a 2026 T2 filing?

下列哪项准确描述了 2026 税年 T2 申报中关于 Schedule 141、财务报表附注以及省级公司税计算的规则?

a. Schedule 141 asks about the preparer's designation, connection and any reservation; notes go as text with e-filing; BC uses federal taxable income.
b. Electronic T2 filers do not need to prepare or transmit notes to the financial statements, because GIFI codes replace all narrative disclosures.
c. Schedule 141 only asks for numerical breakdowns of extraordinary items, and British Columbia requires a separate calculation of provincial net income for tax purposes on Schedule 427.
d. If a corporation understates its Schedule 1 add-backs and is reassessed, it only pays simple interest on the unpaid federal tax because Schedule 1 adjustments do not affect provincial tax.

84′. An internal bookkeeper with no professional accounting designation prepares a corporation's 2026 financial statements (including notes to the financial statements) and its electronic T2 return in British Columbia. What must the corporation do regarding Schedule 141, the financial statement notes, and its BC Schedule 427?

一名没有会计执业资格的公司内部记账员在卑诗省（BC）编制了公司 2026 年的财务报表（含财务报表附注）及电子 T2 申报表。关于 Schedule 141、财务报表附注以及 BC 省 Schedule 427，该公司必须怎么做?

a. Skip Schedule 141 because no external accountant was involved, keep the financial statement notes on file without transmitting them, and recalculate BC net income on Schedule 427.

b. Disclose the internal, non-designated preparer on Schedule 141, send the notes as text with the e-filing, and compute BC tax on federal taxable income.

c. Mail a paper copy of the financial statement notes to the CRA after filing electronically, and apply for a separate BC corporate tax number before submitting Schedule 427.

d. Report on Schedule 141 that an external audit with no reservation was performed so the return passes GIFI validity checks, and deduct BC investment tax credits directly on federal Schedule 1.

答案与逐项解析

第 1 章答案与解析

1 答案 a

a. ✓ 正确。CRA 按四因素测试（four-factor test / Wiebe Door test：控制、工具、利润机会与亏损风险、整合程度）看经济实质而非合同标题；一旦重新定性为雇佣关系，付款方须补缴未代扣的 CPP、EI 与所得税并承担罚款与利息。 / Correct. The CRA applies the four-factor test (Wiebe Door test: control, tools, chance of profit and risk of loss, integration) to economic substance, not to the contract title. Once the relationship is recharacterized as employment, the payer must pay the unwithheld CPP, EI and income tax and bears penalties and interest.

b. ✗ 错误。掉入「合同写承包就算自雇」的陷阱：CRA 不看合同怎么写或双方怎么称呼，只看四因素反映的经济实质。 / Wrong. This falls into the trap "a contract that says contractor means self-employed": the CRA does not look at how the contract is worded or what the parties call it, only at the economic substance shown by the four factors.

c. ✗ 错误。在这套判定下身份不会按税种拆开优待；四项因素全部指向雇员（公司控制工时、提供工具、承担风险、高度整合），整体都会被定性为雇佣。 / Wrong. Under this test status is not split by tax type for favorable treatment; all four factors point to employee (the firm controls hours, supplies tools, bears the risk, and the worker is fully integrated), so the whole relationship is classified as employment.

d. ✗ 错误。判错身份的代价不对称且主要落在付款方（雇主）头上，付款方要补缴未代扣代缴的 CPP、EI 与所得税及罚息，而非让雇员去补雇主份额。 / Wrong. The cost of misclassification is asymmetric and falls mainly on the payer (the employer), who must pay the unremitted CPP, EI and income tax plus penalties and interest; the employee is not made to pay the employer share.

1′ 答案 c

a. ✗ 错误。不能套用职业名称一刀切；CRA 明确指出在自己家里提供日托、自行决定收费与作息、自担场地耗材成本的人通常属于自雇。 / Wrong. You cannot apply a blanket rule by job title; the CRA states that a person who provides daycare in her own home, sets her own fees and hours and bears her own premises and supply costs is generally self-employed.

b. ✗ 错误。个人服务业务（personal service business）针对的是借公司外壳提供实质雇佣服务的人，Elena 是以个人身份独立自雇经营。 / Wrong. A personal services business targets people who provide what is in substance employment services through a corporate shell; Elena runs her business independently as an individual.

c. ✓ 正确。对照四因素测试（four-factor test），Elena 自主掌握控制权、自备场地与耗材工具、自担盈亏风险且独立于单一付款方，属于典型的自雇者（self-employed）。 / Correct. Under the four-factor test, Elena controls her own work, supplies her own premises and supplies, bears the risk of profit and loss, and is independent of any single payer, so she is a classic self-employed person.

d. ✗ 错误。自雇还是雇佣取决于四因素的经济实质，不需要也不靠双方签署放弃代扣义务的书面声明来决定。 / Wrong. Self-employed vs. employee is decided by the economic substance of the four factors; it does not depend on, and is not determined by, a written statement in which the parties waive withholding obligations.

2 答案 b

a. ✗ 错误。现金制（cash method）只开放给农民、渔民以及按佣金计酬的销售代理人三类人，普通服务业独资经营者无权选择现金制。 / Wrong. The cash method is open only to farmers, fishers and sales agents paid on commission; an ordinary service sole proprietor has no right to choose it.

b. ✓ 正确。绝大多数自雇者默认必须使用权责发生制（accrual method）：收入在赚得的 2026 财年入账，支出在归属的 2026 财年扣除，与 2027 年实际收付款的时间点无关。 / Correct. Most self-employed people must use the accrual method by default: revenue is recorded in the 2026 fiscal year in which it is earned and expenses are deducted in the fiscal year to which they belong, regardless of when cash actually moves in 2027.

c. ✗ 错误。权责发生制对收入和支出是一致适用的，2026 年已经发生并归属当年的 $600 维修支出在 2026 年即可扣除，不必等付现。 / Wrong. The accrual method applies consistently to revenue and expenses; a $600 repair that was incurred and belongs to 2026 is deductible in 2026 without waiting for payment.

d. ✗ 错误。Form T1139 是替代财年调节表（alternative method），作用是把非日历年账目折算回 12 月 31 日口径，并不是用来规避权责发生制的工具。 / Wrong. Form T1139 is the reconciliation of business income to a December 31 year end for an alternative method (non-calendar fiscal period); it is not a tool for avoiding the accrual method.

2′ 答案 a

a. ✓ 正确。农渔业进现金制容易、出现金制须经 CRA 同意（ITA s.28(3)）；同时现金制（cash method）下对应两年或以上之后税年的预付费用不能在收付当年一次性扣完，须按对应年度分摊。 / Correct. Farmers and fishers can enter the cash method easily, but leaving it requires CRA consent (ITA s.28(3)); also, under the cash method a prepaid expense that relates to a tax year two or more years later cannot be deducted in full when paid and must be spread over the years it relates to.

b. ✗ 错误。把方向记反了：农渔业选现金制只需在报税表上按现金制计算即可，但一旦用过现金制，要改回权责发生制必须取得 CRA 同意。 / Wrong. This reverses the direction: a farmer or fisher only needs to compute on the cash basis on the return to choose it, but once the cash method has been used, switching back to the accrual method requires CRA consent.

c. ✗ 错误。农民、渔民以及按佣金计酬的销售代理人三类人在 2026 税年依然拥有选择现金制的法定空间。 / Wrong. Farmers, fishers and sales agents paid by commission still have the statutory option to use the cash method for the 2026 tax year.

d. ✗ 错误。现金制专门设有一条防扭曲补丁规则：预付费用若对应两年或以上之后的税年，必须按对应年度分摊，不能在付款当年一次性冲掉。 / Wrong. The cash method has a specific anti-distortion rule: a prepaid expense that relates to a tax year two or more years later must be spread over the years it relates to and cannot be written off all at once in the year of payment.

3 答案 c

a. ✗ 错误。同时掉入「开业前考察费事后补扣」和「漏算餐饮五折」两个陷阱：5 月 1 日正式开始前的 $1,200 探索性支出不可扣，且 $800 餐饮费要打五折。 / Wrong. This combines two traps, "deducting pre-business investigation costs after the fact" and "forgetting the 50% meals rule": the $1,200 of exploratory spending before the formal May 1 start is not deductible, and the $800 of meals must be cut to 50%.

b. ✗ 错误。掉入「开业前考察费事后补扣」的陷阱：2 月份处于「考虑要不要做」阶段的 $1,200 探索性开办前支出，即使后来生意开起来了也永远不能事后补扣。 / Wrong. This falls into the trap "deducting pre-business investigation costs after the fact": the $1,200 of exploratory pre-business spending in February, while still deciding whether to go ahead, can never be deducted afterwards even if the business later opens.

c. ✓ 正确。5 月 1 日正式开始运营前的 $1,200 探索性支出（exploratory pre-business expenses）不可扣；开始后的 $3,000 租金通过目的测试（purpose test, s.18(1)(a)）全额可扣，$800 合理餐饮费按餐饮娱乐五折规则（meals and entertainment 50% rule, s.67.1）扣 $400，合计 $3,400。 / Correct. The $1,200 of exploratory pre-business expenses before operations formally began on May 1 is not deductible; the $3,000 rent after the start passes the purpose test (s.18(1)(a)) and is fully deductible; the $800 of reasonable meals is cut by the meals and entertainment 50% rule (s.67.1) to $400, for a total of $3,400.

d. ✗ 错误。通过 s.67 合理性测试（reasonableness test）只是第一步，餐饮娱乐费还必须再过 s.67.1 的五折限制（取实付与合理金额孰低后再乘 50%）。 / Wrong. Passing the reasonableness test (s.67) is only the first step; meals and entertainment must then also pass the 50% limit in s.67.1 (the lower of the amount paid and the reasonable amount, multiplied by 50%).

3′ 答案 b

a. ✗ 错误。忽略了长途货车司机的专门比例（s.67.1(1.1)）：长途货车司机的合资格餐饮费可扣 80%，而非普通 50%。 / Wrong. This ignores the special percentage for long-haul truck drivers (s.67.1(1.1)): eligible meals of a long-haul truck driver are 80% deductible, not the ordinary 50%.

b. ✓ 正确。先按合理性测试（reasonableness test, s.67）取实际与合理金额较小值 $1,800，再按长途货车司机（long-haul truck driver, s.67.1(1.1)）80% 比例算出 $1,440；与营业无关的个人刑事抗辩律师费未通过目的测试（purpose test, s.18(1)(a)），不可扣除。 / Correct. First take the lower of the actual and reasonable amounts under the reasonableness test (s.67), which is $1,800, then apply the long-haul truck driver (s.67.1(1.1)) 80% rate to get $1,440; the personal criminal defence legal fees unrelated to the business fail the purpose test (s.18(1)(a)) and are not deductible.

c. ✗ 错误。s.67.1 的百分比限制是在「实际支付金额」与「情理之中合理的金额」两者取较小值（$1,800）之后才乘百分比，超出的 $200 不合理部分直接剔除。 / Wrong. The percentage limit in s.67.1 is applied after taking the lower of the amount actually paid and the reasonable amount ($1,800); the unreasonable excess of $200 is removed outright.

d. ✗ 错误。抗辩与营业无关的个人刑事指控属于个人支出，过不了 s.18(1)(a) 目的测试，不能作为营业专业费用扣除。 / Wrong. Defending a personal criminal charge unrelated to the business is a personal expense; it fails the s.18(1)(a) purpose test and cannot be deducted as a business professional fee.

4 答案 c

a. ✗ 错误。自雇者本人的 CPP 供款绝不在 T2125 上作为营业费用扣除，而是另在 Schedule 8 计算后分拆到 T1 的两条线。 / Wrong. The self-employed person's own CPP contributions are never deducted as a business expense on T2125; they are calculated on Schedule 8 and split between two lines of the T1.

b. ✗ 错误。掉入「CPP全额走同一条线」的陷阱：只有雇员等价的基础段走 Line 31000 抵免，雇主等价份额及增强段走 Line 22200 扣除。 / Wrong. This falls into the trap of putting all of the CPP on one line: only the employee-equivalent base portion goes to Line 31000 as a credit, while the employer-equivalent portion and the enhanced portion go to Line 22200 as a deduction.

c. ✓ 正确。自雇 CPP 在 Schedule 8 上一分为二：雇员等价基础段报在 Line 31000 走非退还抵免（non-refundable tax credit，按最低税阶率折算），雇主等价基础段加上全部增强段报在 Line 22200 走扣除（deduction，按个人边际税率折算）。 / Correct. Self-employed CPP is split in two on Schedule 8: the employee-equivalent base portion is reported on Line 31000 as a non-refundable tax credit (converted at the lowest bracket rate), and the employer-equivalent base portion plus all the enhanced portion is reported on Line 22200 as a deduction (converted at the personal marginal rate).

d. ✗ 错误。混淆了表格与行号：Schedule 13、Line 42120 和 Line 31217 是自雇者自愿加入 EI 特殊福利保费的申报落点，不是 CPP。 / Wrong. This mixes up forms and line numbers: Schedule 13, Line 42120 and Line 31217 are where the premiums for voluntary EI special benefits for the self-employed are reported, not CPP.

4′ 答案 d

a. ✗ 错误。向雇主提交 Form CPT30 是雇员的流程；纯自雇者没有雇主，也无需向客户交 CPT30，而是在 Schedule 8 上填停缴月份。 / Wrong. Giving Form CPT30 to an employer is an employee procedure; a purely self-employed person has no employer and no need to give CPT30 to clients, and instead enters the stop-contributing month on Schedule 8.

b. ✗ 错误。已满 65 岁不满 70 岁且正在领取 CPP 的自雇者有权选择停止供款。 / Wrong. A self-employed person aged 65 to under 70 who is receiving CPP is entitled to elect to stop contributing.

c. ✗ 错误。Form T1139 是替代财年调节表，与 65–70 岁停缴 CPP 毫无关系。 / Wrong. Form T1139 is the reconciliation for an alternative fiscal period and has nothing to do with stopping CPP at ages 65 to 70.

d. ✓ 正确。已满 65 岁不满 70 岁且正在领取 CPP 的自雇者，只需在申报期限内交表时直接在 Schedule 8 上追溯填写停止供款生效的月份即可，比雇员交 CPT30 更方便。 / Correct. A self-employed person aged 65 to under 70 who is receiving CPP only needs to enter, retroactively on Schedule 8 when filing within the filing deadline, the month the stop takes effect, which is simpler than an employee's CPT30.

5 答案 a

a. ✓ 正确。因配偶经营自雇业务，Liam 的申报期限（filing deadline）同样延至 6 月 15 日，6 月 10 日交表无迟报罚款；但缴税期限（balance-due date）仍是 4 月 30 日，5 月 1 日起计息；当年（$4,200）与前两年之一（2025 年 $3,800）净欠税都超过 $3,000 门槛，属于须按季分期预缴（instalment payments）的人。 / Correct. Because a spouse runs a self-employed business, Liam's filing deadline is also extended to June 15, so filing on June 10 carries no late-filing penalty; but the balance-due date is still April 30 and interest runs from May 1; net owing exceeds the $3,000 threshold both in the current year ($4,200) and in one of the two prior years (2025: $3,800), so he must pay quarterly instalments.

b. ✗ 错误。掉入「6月15日才算欠税晚交」的经典陷阱：延后到 6 月 15 日的只有申报期限，欠税的缴税期限依然是 4 月 30 日。 / Wrong. This falls into the classic trap "treating June 15 as the payment deadline": only the filing deadline is deferred to June 15; the payment deadline for a balance owing is still April 30.

c. ✗ 错误。《所得税法》s.150(1)(d) 的 6 月 15 日申报延期同时适用于自雇者本人及其配偶或普通法伴侣（spouse or common-law partner）。 / Wrong. The June 15 filing extension in ITA s.150(1)(d) applies both to the self-employed person and to the spouse or common-law partner.

d. ✗ 错误。全年只在 12 月 31 日交一期分期预缴是农渔业自雇者的专属例外，不是 BC 省普通自雇者或配偶的规则（普通自雇分期到期日为 3/6/9/12 月的 15 日）。 / Wrong. A single instalment on December 31 is an exception specific to farming and fishing self-employed people; it is not the rule for an ordinary BC self-employed person or spouse (the ordinary instalment dates are the 15th of March, June, September and December).

5′ 答案 b

a. ✗ 错误。4 月 30 日与 6 月 15 日是次年汇算清缴与申报的截止日，不是当年按季分期预缴的四个到期日。 / Wrong. April 30 and June 15 are the following year's balance-due and filing deadlines, not the four quarterly instalment dates for the current year.

b. ✓ 正确。除农渔业外，净欠税额在当年及前两年之一超过 $3,000（魁省 $1,800）门槛的自雇者须按季分期预缴（instalment payments），四个固定到期日为 3 月 15 日、6 月 15 日、9 月 15 日、12 月 15 日。 / Correct. Except for farming and fishing, a self-employed person whose net owing exceeds $3,000 ($1,800 in Quebec) in the current year and in one of the two prior years must pay quarterly instalments, on four fixed dates: March 15, June 15, September 15 and December 15.

c. ✗ 错误。12 月 31 日单期预缴仅适用于农民和渔民，IT 顾问必须按四个季度到期日预缴。 / Wrong. A single December 31 instalment applies only to farmers and fishers; an IT consultant must pay on the four quarterly dates.

d. ✗ 错误。分期预缴的法定净欠税门槛是 $3,000（魁省 $1,800，ITA s.156.1(1)），不存在 $6,000 的门槛。 / Wrong. The statutory net-owing threshold for instalments is $3,000 ($1,800 in Quebec, ITA s.156.1(1)); there is no $6,000 threshold.

6 答案 d

a. ✗ 错误。犯了「把营业亏损和资本亏损混着用」的错误：回抵 3 年、无限期结转且仅抵资本利得的是净资本亏损（net capital loss），而营业亏损剩余部分属于非资本亏损。 / Wrong. This makes the mistake of mixing business losses with capital losses: the amount that carries back 3 years, carries forward indefinitely and offsets only capital gains is a net capital loss, whereas the remaining business loss is a non-capital loss.

b. ✗ 错误。自雇营业亏损首先就会与本人当年其他来源的收入（包括雇佣收入）相抵，且结转后也可抵扣未来任何来源的收入。 / Wrong. A self-employed business loss is first set against the person's other income of the year (including employment income), and when carried forward it can also offset future income from any source.

c. ✗ 错误。非资本亏损的法定结转期限是 20 个税年（ITA s.111(1)(a)），不是 7 年，且可抵扣任何来源的收入。 / Wrong. The statutory carryforward period for a non-capital loss is 20 tax years (ITA s.111(1)(a)), not 7 years, and it can offset income from any source.

d. ✓ 正确。自雇营业亏损先抵当年 $18,000 雇佣收入，剩余 $27,000 成为非资本亏损（non-capital loss, ITA s.111(1)(a)），可以回抵前 3 个税年或结转后 20 个税年，抵扣任何来源的收入。 / Correct. The self-employed business loss is first set against $18,000 of employment income for the year, and the remaining $27,000 becomes a non-capital loss (ITA s.111(1)(a)) that can be carried back 3 tax years or forward 20 tax years against income from any source.

6′ 答案 a

a. ✓ 正确。净资本亏损（net capital loss）与非资本亏损（non-capital loss）是两套完全独立、不可混用的规则：净资本亏损只能抵扣资本利得，不能用来冲抵 T2125 的营业收入。 / Correct. A net capital loss and a non-capital loss are two entirely separate rules that cannot be mixed: a net capital loss can offset only capital gains and cannot offset T2125 business income.

b. ✗ 错误。净资本亏损永远不会自动或按比例转化为非资本亏损，两者不可互相顶替。 / Wrong. A net capital loss is never automatically or proportionally converted into a non-capital loss; the two cannot substitute for each other.

c. ✗ 错误。T2125 Part 5 处理的是合伙份额、合伙人自付费用和业务用房支出，不能把净资本亏损塞进营业报表。 / Wrong. T2125 Part 5 deals with partnership shares, partner's own expenses and business-use-of-home expenses; a net capital loss cannot be put into the business statement.

d. ✗ 错误。净资本亏损可回抵 3 年、无限期结转（不会在 3 年后过期），它不能用的原因是抵扣对象仅限于资本利得。 / Wrong. A net capital loss can be carried back 3 years and carried forward indefinitely (it does not expire after 3 years); the reason it cannot be used here is that it can offset only capital gains.

7 答案 b

a. ✗ 错误。掉入「专业人士年底排除WIP」的历史陷阱：原允许六类指定专业人士按开票入账（billed-basis accounting）排除 WIP 的 ITA s.34 已于 2017 年被整条废除。 / Wrong. This falls into the historical trap "professionals excluding year-end WIP": ITA s.34, which let six types of designated professionals use billed-basis accounting to exclude WIP, was repealed outright in 2017.

b. ✓ 正确。牙医属于专业收入（professional income），填 T2125 Part 3B；原 s.34 排除选举已于 2017 年废除且五年过渡期已在 2022 税年前结束，现行规则下所有专业人士必须在期末将在制品（work-in-progress, WIP）按成本与公允市价孰低（$9,000）计入当年收入。 / Correct. A dentist has professional income and completes T2125 Part 3B; the former s.34 exclusion election was repealed in 2017 and the five-year transition ended before the 2022 tax year, so under current rules all professionals must include work in progress (WIP) at year end in the year's income at the lower of cost and fair market value ($9,000).

c. ✗ 错误。牙医属于蕴含专门知识的专业人士，应填 Part 3B 而非 Part 3A，且期末 WIP 按成本与公允市价孰低（$9,000）计入，而非强制按更高的公允市价 $14,000。 / Wrong. A dentist is a professional whose work rests on specialized knowledge and should use Part 3B, not Part 3A, and year-end WIP is included at the lower of cost and fair market value ($9,000), not at the higher fair market value of $14,000.

d. ✗ 错误。每年带回 20% 的五年过渡期早在 2022 税年之前就已经全部走完，2026 税年期末 WIP 必须全额按成本与公允市价孰低计入当年收入。 / Wrong. The five-year transition, which brought back 20% each year, ended well before the 2022 tax year; for the 2026 tax year year-end WIP must be included in full in the year's income at the lower of cost and fair market value.

7′ 答案 c

a. ✗ 错误。专业收入（professional income）的区分标准是「是否属于蕴含专门知识、区别于单纯技能的职业」，法院明确将建筑师、工程师、IT 顾问包含在内，且同时有营业和专业两类收入必须分开填两张 T2125。 / Wrong. The test for professional income is whether the occupation rests on specialized knowledge as distinct from mere skill; the courts expressly include architects, engineers and IT consultants, and a person with both business and professional income must complete two separate T2125s.

b. ✗ 错误。同时有营业收入与专业收入的人必须分别填两张 T2125，网店商品属于期末存货（Part 3A），不是专业服务在制品（WIP）。 / Wrong. A person with both business income and professional income must file two separate T2125s, and online-shop goods are year-end inventory (Part 3A), not the work in progress (WIP) of a professional service.

c. ✓ 正确。同时有营业收入（business income, Part 3A，核算期末存货成本）和专业收入（professional income, Part 3B，包括 IT 顾问，按成本与公允市价孰低核算期末 WIP）的人，必须分别填报两张 Form T2125，且网店还需填写 Part 2 网络收入信息。 / Correct. A person with both business income (Part 3A, which accounts for year-end inventory cost) and professional income (Part 3B, which includes IT consultants and accounts for year-end WIP at the lower of cost and fair market value) must file two separate Forms T2125, and the online shop must also complete the Part 2 online income information.

d. ✗ 错误。独立自雇的 IT 顾问属于专业收入，填报在另一张 T2125 的 Part 3B（最终落到 T1 Line 13700），不是雇佣收入。 / Wrong. An independent self-employed IT consultant has professional income, reported on Part 3B of the other T2125 (and ending up on T1 Line 13700), not employment income.

第 2 章答案与解析

8 答案 a

a. ✓ 根据 s.18(12) 及 Income Tax Folio S4-F2-C2，家庭办公室支出（business-use-of-home expenses）须满足两道替代门槛之一：要么是主要营业地（principal place of business），要么专门用于赚取营业收入并经常持续用于当面（面对面）接待客户。Maya 的主要营业地是商业诊所，且 CRA 明确电话或视频会议不算当面会客，因此两条门槛均不满足。 / Under s.18(12) and Income Tax Folio S4-F2-C2, business-use-of-home expenses must meet one of two alternative thresholds: the space is either the principal place of business, or it is used exclusively to earn business income and regularly and continuously to meet clients in person (face to face). Maya's principal place of business is the commercial clinic, and the CRA is clear that phone or video meetings do not count as meeting in person, so neither threshold is met.

b. ✗ 这落入了「工时与视频会客混淆陷阱」：「花了很多时间在家工作」从来不是法定资格判据，只要另有主要营业地且未在家当面接待客户，耗时再长也不能扣。 / This falls into the trap "mixing up hours worked with video client meetings": spending a lot of time working at home has never been the statutory test; if there is another principal place of business and clients are not met in person at home, no amount of time makes the expenses deductible.

c. ✗ 这落入了「工时与视频会客混淆陷阱」：CRA 对「见客户（meet clients）」沿用最传统的面对面含义，电话或视频会议不算数。 / This falls into the trap "mixing up hours worked with video client meetings": the CRA gives "meet clients" its most traditional face-to-face meaning, and phone or video meetings do not count.

d. ✗ 这落入了「雇员与自雇清单串位陷阱」：疫情期按天数定额扣的临时统一费率法（2020—2022）从一开始就只对雇员开放且早已作废，自雇者从未适用过该方法。 / This falls into the trap "swapping the employee and self-employed lists": the temporary flat rate method based on days worked (2020–2022) during the pandemic was open only to employees from the start and has long been discontinued; the self-employed never qualified for it.

8′ 答案 c

a. ✗ 这落入了把两条替代门槛当成必须同时满足的陷阱：虽然视频会议不满足第二条「当面会客」门槛，但只要家是主要营业地，就不需要靠第二条门槛过关。 / This falls into the trap of treating the two alternative thresholds as both required: although video meetings do not satisfy the second threshold of meeting clients in person, as long as the home is the principal place of business there is no need to pass the second threshold.

b. ✗ s.18(12) 的两条门槛是替代关系（满足其一即可），并不要求同时满足两条。 / The two thresholds of s.18(12) are alternatives (meeting either one is enough); both are not required at once.

c. ✓ 家庭办公室的两条门槛互为替代：由于 Liam 没有其他营业场所，家中的书房就是其主要营业地（principal place of business），直接满足第一条门槛，无需再满足第二条当面会客要求。 / The two home office thresholds are alternatives: since Liam has no other place of business, the study at home is his principal place of business, which satisfies the first threshold directly with no need to also meet the second in-person requirement.

d. ✗ 这落入了「雇员与自雇清单串位陷阱」：自雇者满足门槛后不仅可以扣水电暖，还能按比例扣物业税、房屋保险以及按揭利息。 / This falls into the trap "swapping the employee and self-employed lists": once a self-employed person meets the threshold, he can deduct not only utilities but also, proportionally, property tax, home insurance and mortgage interest.

9 答案 b

a. ✗ 这同时踩中了「雇员与自雇清单串位陷阱」与「家庭办公室制造亏损陷阱」：按揭本金（mortgage principal）是资产净值转移，永远不可扣除；且家庭办公室支出不得超过扣前净收入制造亏损。 / This steps on both the trap "swapping the employee and self-employed lists" and the trap "creating a loss with the home office": mortgage principal is a transfer of equity and can never be deducted, and home office expenses cannot exceed net income before the deduction so as to create a loss.

b. ✓ 自雇者可按比例扣除水电暖、房屋保险、物业税及按揭利息（mortgage interest）合计 $3,100，但按揭本金永远不可扣；受净收入限制（net income limitation），当年最多只能扣 $2,400 将净收入减至 $0，剩余 $700 结转到以后年度同一业务在继续满足门槛时使用。 / A self-employed person may deduct, proportionally, utilities, home insurance, property tax and mortgage interest, totaling $3,100, but mortgage principal can never be deducted; subject to the net income limitation, at most $2,400 can be deducted in the year, reducing net income to $0, and the remaining $700 is carried forward to later years for the same business, provided the threshold is still met.

c. ✗ 这落入了「家庭办公室制造亏损陷阱」：虽然正确排除了按揭本金，但违反了 s.18(12) 家庭办公室支出不得制造或扩大经营亏损的硬限制。 / This falls into the trap "creating a loss with the home office": it correctly excludes mortgage principal but breaks the hard limit in s.18(12) that home office expenses cannot create or increase a business loss.

d. ✗ 这落入了「雇员与自雇清单串位陷阱」：雇员不能扣按揭利息，但自雇者完全可以按比例扣除按揭利息，只有按揭本金不能扣。 / This falls into the trap "swapping the employee and self-employed lists": employees cannot deduct mortgage interest, but a self-employed person can fully deduct mortgage interest proportionally; only mortgage principal cannot be deducted.

9′ 答案 a

a. ✓ 当工作空间不是专用（如餐桌白天办公晚上吃饭）时，自雇者可扣的水电暖、物业税、房屋保险与按揭利息须分两步分摊：先按工作空间面积除以住宅总面积，再按用于经营的时间比例打第二折，且同样受净收入限制不得制造亏损。 / When the workspace is not exclusive (such as a dining table used for work in the day and meals in the evening), the utilities, property tax, home insurance and mortgage interest a self-employed person may deduct must be allocated in two steps: first by workspace area over total home area, then a second reduction by the proportion of time used for business, and the net income limit still applies so that no loss can be created.

b. ✗ 「专门使用（exclusive use）」只是第二条门槛的要求；既然家是她的唯一及主要营业地（满足第一条门槛），非专用空间依然可以申报，只需在面积比例后再乘以时间比例。 / "Exclusive use" is only a requirement of the second threshold; since the home is her sole and principal place of business (meeting the first threshold), non-exclusive space can still be claimed, with the time proportion applied after the area proportion.

c. ✗ 换窗户、装修厨房等让房屋整体升值的支出属于资本性装修（capital renovations），永远不能作为当年现行费用直接进家庭办公室清单。 / Spending that raises the value of the whole house, such as replacing windows or renovating the kitchen, is a capital renovation and can never go directly on the home office list as a current expense.

d. ✗ 非专用空间必须再按经营时间比例打折，且超出净收入限制的部分只能结转用于同一自雇业务的后年收入，不能当场抵扣其他收入。 / Non-exclusive space must be further reduced by the proportion of business time, and the part beyond the net income limit can only be carried forward against later-year income of the same self-employed business and cannot be set against other income on the spot.

10 答案 c

a. ✗ 基准年抽样法要求连续记满三个月且浮动不超过 10%（而非一个月和 20%），且必须先算车辆费用、最后算家庭办公室支出。 / The base year method requires three consecutive months of records with a variance of no more than 10% (not one month and 20%), and vehicle expenses must be computed first and home office expenses last.

b. ✗ 简化法仍须连续三个月抽样记录，车辆贷款利息须先按月度上限（s.67.2）封顶再乘以经营比例，且记录须保存六年而非三年。 / The simplified method still requires three consecutive months of sample records, vehicle loan interest must first be capped at the monthly limit (s.67.2) and then multiplied by the business-use ratio, and records must be kept for six years, not three.

c. ✓ 基准年抽样法（base year method）要求在记满一整年后，每年连续记录三个月抽样日志且比例在基准年 10% 范围内，记录保存六年；在 T2125 流程上，先算车辆现付费用（Line 9281）与 CCA（Line 9936），最后在 Part 7（Line 9945）算受净收入限制的家庭办公室支出。 / The base year method requires, after a full year of records, a three-consecutive-month sample logbook each year with the percentage within 10% of the base year, and records kept for six years; in the T2125 sequence, you first compute vehicle out-of-pocket expenses (Line 9281) and CCA (Line 9936), and last, in Part 7 (Line 9945), the home office expense subject to the net income limit.

d. ✗ 从家直接开车去固定办公场所属于个人通勤（commuting），不算经营用途公里数，且车辆费用落 Line 9281 而非家庭办公室行 Line 9945。 / Driving from home directly to a fixed workplace is personal commuting, not business kilometres, and vehicle expenses go on Line 9281, not on the home office line, Line 9945.

10′ 答案 b

a. ✗ 行驶模式发生实质变化后基准年不再有代表性，不能继续沿用；且贷款利息必须先按月度上限封顶，再乘以经营使用比例。 / After a substantial change in driving pattern the base year is no longer representative and cannot be kept; and loan interest must be capped at the monthly limit first and then multiplied by the business-use ratio.

b. ✓ 一旦换了主要客户群或搬了办公地点导致行驶模式实质变化，原基准年即失去代表性，须重新做一整年完整记录；计算车辆贷款利息（s.67.2）与租赁费用（s.67.3）时，先按联邦月度上限封顶，再乘以经营比例。 / Once a change of main client group or a move of office location substantially changes the driving pattern, the original base year loses its representativeness and a new complete one-year record must be kept; when computing vehicle loan interest (s.67.2) and lease costs (s.67.3), cap at the federal monthly limit first and then multiply by the business ratio.

c. ✗ 车辆扣除必须有可靠记录支持，不能假定事后估算会获 CRA 接受，记录不足可能被调整或整笔拒绝。 / Vehicle deductions must be supported by reliable records; you cannot assume the CRA will accept an after-the-fact estimate, and inadequate records may lead to an adjustment or a complete denial.

d. ✗ 行车日志与相关凭证必须从相关税年年末算起保存六年，而非一年。 / The logbook and related vouchers must be kept for six years from the end of the relevant tax year, not one year.

11 答案 b

a. ✗ 这落入了「豪车上限与处置混同陷阱」：把普通类别处置的追加折旧（recapture）与期末亏损（terminal loss）套到了 Class 10.1 上，且误以为处置年完全不能提 CCA。 / This falls into the trap "confusing the luxury car cap with disposition rules": it applies the recapture and terminal loss of ordinary class disposals to Class 10.1, and wrongly thinks no CCA at all can be claimed in the year of disposition.

b. ✓ Class 10.1 是处置规则的法定例外：每辆超上限乘用车单独成类，依据 s.13(2) 与 s.20(16.1) 处置时既不算追加折旧（recapture）也不允许期末亏损（terminal loss），且只要上年年末该车仍在 Class 10.1 里，处置当年仍可申报正常费率一半的 CCA。 / Class 10.1 is a statutory exception to the disposition rules: each passenger vehicle above the cap forms a class of its own, and on disposition under s.13(2) and s.20(16.1) there is neither recapture nor a terminal loss, and as long as the vehicle was still in Class 10.1 at the end of the prior year, one half of the normal-rate CCA can still be claimed in the year of disposition.

c. ✗ Class 10.1 的核心规则是「每辆车单独成一类」，绝不与 Class 10 的其他车辆合并计算未折旧资本成本余额（UCC）。 / The core rule of Class 10.1 is "one class per vehicle"; it is never combined with other Class 10 vehicles to compute undepreciated capital cost (UCC).

d. ✗ 超出法定上限的车价从一开始就没有进入 CCA 系统，折旧财产也不产生资本亏损，且 Class 10.1 明确禁止在处置时申报期末亏损（terminal loss）。 / The part of the price above the statutory cap never entered the CCA system, depreciable property does not produce a capital loss, and Class 10.1 expressly prohibits claiming a terminal loss on disposition.

11′ 答案 a

a. ✓ 超过法定上限的乘用车须单独归入 Class 10.1，以财政部宣布的 2026 年上限 $39,000 加上按这 $39,000 计算的适用销售税（已申 ITC 的 GST 不再计入）作为成本基础。注意《所得税条例》s.7307 合订本至 2026-07-21 仍写 $38,000，2026 年取得的车辆按财政部宣布的 $39,000 计算（2025 年取得的仍是 $38,000）。 / A passenger vehicle above the statutory cap must go in Class 10.1 on its own, with the cost base being the 2026 cap of $39,000 announced by Finance plus the applicable sales tax calculated on that $39,000 (GST for which an ITC is claimed is no longer included). Note that the consolidation of Income Tax Regulations s.7307 to 2026-07-21 still says $38,000; a vehicle acquired in 2026 is computed at the $39,000 announced by Finance (one acquired in 2025 is still at $38,000).

b. ✗ 这落入了「豪车上限与处置混同陷阱」：无论业务使用比例多高，超过法定上限的乘用车都不能按实际买价 $132,000 入 Class 10，超出部分永久排除在 CCA 成本基础之外。 / This falls into the trap "confusing the luxury car cap with disposition rules": however high the business-use percentage, a passenger vehicle above the statutory cap cannot go into Class 10 at the actual purchase price of $132,000, and the excess is permanently excluded from the CCA cost base.

c. ✗ Class 54 仅适用于零排放乘用车（zero-emission passenger vehicles），普通燃油乘用车超过上限只能进 Class 10.1。 / Class 54 applies only to zero-emission passenger vehicles; an ordinary gasoline passenger vehicle above the cap can only go in Class 10.1.

d. ✗ 这是案例中指出的常见错报：不能只按光秃秃的 $39,000 入类，按这 $39,000 上限对应计算的未抵免销售税（如不可退还的 PST）应当计入成本基础。 / This is the common reporting error flagged in the case: you cannot put the bare $39,000 into the class; the unrecovered sales tax calculated on that $39,000 cap (such as non-refundable PST) should be included in the cost base.

12 答案 d

a. ✗ 成本低于 $500 的小工具属于 Class 12 而非 Class 8，租用场地改良属于 Class 13 而非 Class 12。 / Small tools costing less than $500 belong in Class 12, not Class 8, and improvements to leased premises belong in Class 13, not Class 12.

b. ✗ Class 12 中低于 $500 的小工具明确不受半年规则（half-year rule）约束（软件才受半年规则），且车间工具柜属于 Class 8 而非计算机硬件的 Class 50。 / Small tools under $500 in Class 12 are expressly not subject to the half-year rule (software is), and a workshop tool cabinet belongs in Class 8, not in Class 50 for computer hardware.

c. ✗ 不同性质的财产必须归入各自的法定 CCA 类别，且即使在同一类别内，同一年也只能对整个类别选择一个申报额度，不能对类别内某一件多提、另一件少提。 / Property of different kinds must go into its own statutory CCA class, and even within the same class only one claim amount can be chosen for the whole class in a year; you cannot claim more on one item in the class and less on another.

d. ✓ 成本低于 $500 的工具归入 Class 12（当年全额折完且不受半年规则约束），成本至少 $500 的一般工具与家具设备归入兜底类别 Class 8，租用场地上的资本性改良（leasehold interest）归入 Class 13 并按租期直线法（straight-line）计算。 / Tools costing less than $500 go in Class 12 (written off in full in the year and not subject to the half-year rule), general tools and furniture and equipment costing $500 or more go in the residual Class 8, and capital improvements to leased premises (leasehold interest) go in Class 13 and are depreciated straight-line over the lease term.

12′ 答案 b

a. ✗ 追加折旧（recapture）发生在类别期末 UCC 在年度增减调整后为负数时；当类别已空且仍有正数未折旧余额时，产生的是期末亏损而非追加折旧。 / Recapture arises when the class's ending UCC is negative after the year's additions and reductions; when the class is empty and there is still a positive undepreciated balance, the result is a terminal loss, not recapture.

b. ✓ 当普通 CCA 类别（非 Class 10.1）里已经没有财产但仍有未折旧余额（UCC）时，剩余部分可作为期末亏损（terminal loss）全额扣除，且不像资本损失只抵资本利得，期末亏损可用来抵扣任何来源的收入。 / When an ordinary CCA class (not Class 10.1) no longer has any property but still has an undepreciated balance (UCC), the remainder can be deducted in full as a terminal loss, and unlike a capital loss, which offsets only capital gains, a terminal loss can offset income from any source.

c. ✗ 折旧财产类别清空后的剩余 UCC 是期末亏损（terminal loss），可以全额抵扣任何来源的收入，不受「资本损失只能抵资本利得」的限制。 / The remaining UCC after a depreciable property class is emptied is a terminal loss, which can be deducted in full against income from any source and is not subject to the limit that "a capital loss can offset only capital gains".

d. ✗ s.20(16.1) 禁止期末亏损仅针对 Class 10.1 的超上限乘用车，普通 Class 8 财产完全允许申报期末亏损。 / s.20(16.1) bars a terminal loss only for over-cap passenger vehicles in Class 10.1; ordinary Class 8 property may fully claim a terminal loss.

13 答案 a

a. ✓ 2026 税年乘用车联邦精选豪华品税（Select Luxury Items Tax）仍然有效，税额取「总价 10%（$13,200）」与「超出 $100,000 部分的 20%（$32,000 × 20% = $6,400）」中的较小值，即 $6,400；从 GST 注册商购买普通乘用车，车价在 $125,000 至不足 $150,000 档位适用 15% 的 BC PST，即 $132,000 × 15% = $19,800。 / The federal Select Luxury Items Tax on a passenger vehicle remains in force for the 2026 tax year, with the amount being the lesser of "10% of the total price ($13,200)" and "20% of the amount over $100,000 ($32,000 x 20% = $6,400)", that is, $6,400; for an ordinary passenger vehicle bought from a GST registrant, a price from $125,000 to under $150,000 attracts BC PST at 15%, that is, $132,000 x 15% = $19,800.

b. ✗ 这落入了「新政已宣布与已生效混淆陷阱」：Budget 2025 与 C–15 仅终止了飞机与船舶的豪华税，超过 $100,000 的车辆豪华税从未被终止，2026 年仍须缴纳 $6,400。 / This falls into the trap "confusing announced with in force": Budget 2025 and C–15 ended the luxury tax only on aircraft and boats; the luxury tax on vehicles over $100,000 was never ended and $6,400 is still payable in 2026.

c. ✗ 联邦豪华税取 $13,200 与 $6,400 中的较小值而非较大值；且 BC 经销商出售普通乘用车低于 $55,000 才适用 7%，$132,000 落在 15% 档位。 / The federal luxury tax is the lesser, not the greater, of $13,200 and $6,400; and BC PST of 7% applies to an ordinary passenger vehicle sold by a dealer only below $55,000, while $132,000 falls in the 15% tier.

d. ✗ 这是案例明确指出的常见错报：联邦豪华税与 BC 省级分档 PST 是两层独立的税负，互不冲抵，不是「二选一」。 / This is the common reporting error flagged in the case: the federal luxury tax and BC's provincial tiered PST are two independent layers of tax with no offset between them; it is not "one or the other".

13′ 答案 c

a. ✗ GST 注册商出售普通乘用车低于 $55,000 为 7%（私人交易才有 12% 等税率），而 $150,000 起为 20%（$57,000 至不足 $125,000 才是 10%）。 / A GST registrant selling an ordinary passenger vehicle charges 7% below $55,000 (private transactions carry rates such as 12%), and 20% from $150,000 (the 10% tier is $57,000 to under $125,000).

b. ✗ ZEV 的前三个高档起点提高到了 $75,000、$76,000、$77,000；且飞机与船舶的联邦豪华税已在 2025–11–04 之后由 C–15 终止。 / For a ZEV the starting points of the first three high tiers are raised to $75,000, $76,000 and $77,000; and the federal luxury tax on aircraft and boats was ended by C–15 after 2025–11–04.

c. ✓ GST 注册商出售普通乘用车：低于 $55,000 为 7%，$55,000 至不足 $56,000 为 8%，$56,000 至不足 $57,000 为 9%，$57,000 至不足 $125,000 为 10%，$125,000 至不足 $150,000 为 15%，$150,000 起为 20%（ZEV 前三个起点改为 $75,000、$76,000、$77,000）；同时联邦豪华税在飞机与船舶部分终止后，对超 $100,000 的车辆依然适用。 / A GST registrant selling an ordinary passenger vehicle: 7% below $55,000, 8% from $55,000 to under $56,000, 9% from $56,000 to under $57,000, 10% from $57,000 to under $125,000, 15% from $125,000 to under $150,000, and 20% from $150,000 (for a ZEV the first three starting points become $75,000, $76,000 and $77,000); and after the aircraft and boat part of the federal luxury tax ended, it still applies to vehicles over $100,000.

d. ✗ 车辆豪华税是「总价的 10%」与「超出 $100,000 部分的 20%」两者取较小值，绝不是按全部车价的 20% 征收。 / The vehicle luxury tax is the lesser of "10% of the total price" and "20% of the amount over $100,000"; it is never 20% of the whole vehicle price.

14 答案 c

a. ✗ 这落入了「新政已宣布与已生效混淆陷阱」：制造加工建筑 100% 即时费用化仍在 Bill C-31 中、尚未立法；且 Class 53 已于 2025 年底截止新增。 / This falls into the trap "confusing announced with in force": 100% immediate expensing for manufacturing and processing buildings is still in Bill C-31 and not yet law; and Class 53 closed to new additions at the end of 2025.

b. ✗ Bill C-15 已于 2026-03-26 御准，逆转了加速投资激励（AII）的退坡并恢复首年增强扣除，同时落实了 Classes 44/46/50 的首年全扣。 / Bill C-15 received royal assent on 2026-03-26, reversing the phase-out of the Accelerated Investment Incentive (AII) and restoring the enhanced first-year deduction, and it also enacted the full first-year write-off for Classes 44/46/50.

c. ✓ 必须把 2026 年的三态分清：① 2024-04-16 起取得且 2027 前可用的 Classes 44/46/50 生产性资产首年全扣已由 Bill C-15 御准生效；② Class 53 到 2025 年底截止新增，2026 年新购制造机器设备归入 Class 43（普通年率 30%），但它若在 2025 年取得本会归 Class 53，作为 RIIP 首年可 100% 扣除，2029 年后才可供使用的开始退坡；③ 制造加工建筑 100% 即时费用化仍在 Bill C-31 中、尚未立法，属于「已宣布、非现行规则」，2026 申报须按现行规则处理。 / You must keep the three states of 2026 apart: (1) the full first-year write-off for Classes 44/46/50 productive assets acquired from 2024-04-16 and available for use before 2027 is in force through the royal assent of Bill C-15; (2) Class 53 closed to new additions at the end of 2025, and newly purchased manufacturing machinery in 2026 goes into Class 43 (ordinary 30% rate), but if it would have gone in Class 53 had it been acquired in 2025, it can be deducted 100% in the first year as RIIP, with phase-out starting only for property available for use after 2029; (3) 100% immediate expensing for manufacturing and processing buildings is still in Bill C-31 and not yet law, which is "announced, not a current rule", and 2026 filing must follow the current rules.

d. ✗ 这把两个法案的内容颠倒了：Classes 44/46/50 生产性资产首年全扣已在 Bill C-15 中御准生效，而制造加工建筑 100% 即时费用化才在未御准的 Bill C-31 里。 / This reverses the content of the two bills: the full first-year write-off for Classes 44/46/50 productive assets was enacted in Bill C-15, which received royal assent, while 100% immediate expensing for manufacturing and processing buildings is in Bill C-31, which has not.

14′ 答案 a

a. ✓ Class 53（50% 费率）于 2025 年底截止新增，2026 年起新购合资格制造加工设备改归 Class 43（普通年率 30%）；同时 C-15 已恢复加速投资激励/RIIP 首年增强规则，必须先核对资产类别、取得日期与可供使用日期，分开普通年率与合资格 RIIP 首年规则：本会归 Class 53 的制造加工设备首年可 100% 扣除（2029 年后才可供使用的开始退坡），不能只按普通 30% 算首年。 / Class 53 (50% rate) closed to new additions at the end of 2025, and from 2026 newly purchased eligible manufacturing and processing equipment goes into Class 43 (ordinary 30% rate); at the same time C-15 has restored the Accelerated Investment Incentive/RIIP first-year enhancement rules, so you must first check the asset class, acquisition date and available-for-use date and separate the ordinary rate from the eligible RIIP first-year rule: manufacturing and processing equipment that would have gone in Class 53 can be deducted 100% in the first year (phase-out begins only for property available for use after 2029), so you cannot compute the first year at the ordinary 30% alone.

b. ✗ Class 53 已于 2025 年底截止新增；且 CCA 是否申报可自行选择（不申报或申报低于上限均合法）。 / Class 53 closed to new additions at the end of 2025; and whether to claim CCA is the taxpayer's choice (not claiming, or claiming less than the maximum, is lawful).

c. ✗ Class 13 仅适用于租用场地上的资本性改良（leasehold interest），2026 年新购制造加工机器设备应归入 Class 43。 / Class 13 applies only to capital improvements to leased premises (leasehold interest); newly purchased manufacturing and processing machinery in 2026 should go into Class 43.

d. ✗ 一旦几件财产共用同一个 CCA 类别，同一年只能对整个类别选择一个申报额度，不能对类别内某一件多提、另一件少提。 / Once several properties share the same CCA class, only one claim amount can be chosen for the whole class in a year; you cannot claim more on one item and less on another.

第 3 章答案与解析

15 答案 c

a. ✗ 错误。落入“不向客户收税就是豁免供应”的陷阱：软件出口属于零税率供应（zero-rated supply），虽然税率为0%，但仍属应税供应，可注册并全额退回进项税。 / Wrong. This falls into the trap "no tax charged to the customer means exempt supply": software exports are zero-rated supplies; although the rate is 0%, they are still taxable supplies, may be registered, and the input tax is refunded in full.

b. ✗ 错误。住宅长租属于豁免供应（exempt supply），既不计入$30,000注册门槛，也不能抵扣与之相关的任何进项税额抵免（ITC）。 / Wrong. Long-term residential rental is an exempt supply; it neither counts toward the $30,000 registration threshold nor allows any input tax credit (ITC) related to it.

c. ✓ 正确。出口属于零税率供应（zero-rated supply），本质仍是应税供应（taxable supply），计入$30,000全球应税供应门槛且进项税额抵免（input tax credit, ITC）照常全额抵扣；住宅长租属于豁免供应（exempt supply），不在税网内，不计入门槛且进项一分都不能抵。 / Correct. Exports are zero-rated supplies, which are still taxable supplies in substance, count toward the $30,000 worldwide taxable supply threshold, and allow input tax credits (ITCs) in full as usual; long-term residential rental is an exempt supply, outside the tax net, does not count toward the threshold and allows no input tax credit at all.

d. ✗ 错误。把零税率供应与豁免供应的定义完全颠倒了：出口是零税率供应（可抵ITC），住宅长租是豁免供应（不可抵ITC）。 / Wrong. This completely reverses the definitions of zero-rated and exempt supplies: exports are zero-rated supplies (ITC allowed) and long-term residential rental is an exempt supply (no ITC).

15′ 答案 a

a. ✓ 正确。处方药与基本食品杂货属于零税率供应（zero-rated supply），对客户的税率为 0，但上游进项税额抵免（ITC）可全额退回；托儿服务属于豁免供应（exempt supply），不能抵扣任何进项税。 / Correct. Prescription drugs and basic groceries are zero-rated supplies; the rate to the customer is 0, but upstream input tax credits (ITCs) are refunded in full; child care services are exempt supplies and no input tax can be claimed.

b. ✗ 错误。混淆了零税率与豁免：虽然柜台都不收税，但处方药和基本食品是零税率应税供应，注册后可全额退回进项税。 / Wrong. This confuses zero-rated with exempt: although no tax is charged at the counter in either case, prescription drugs and basic groceries are zero-rated taxable supplies, and once registered the input tax is fully refunded.

c. ✗ 错误。将两类供应颠倒了：托儿服务是豁免供应（不可抵ITC），处方药和基本食品是零税率供应（可抵ITC）。 / Wrong. This reverses the two kinds of supply: child care is an exempt supply (no ITC), while prescription drugs and basic groceries are zero-rated supplies (ITC allowed).

d. ✗ 错误。即便因为药房业务成为登记人（registrant），专门用于豁免供应（托儿服务）的采购依然不得抵扣任何ITC。 / Wrong. Even if the pharmacy business makes the person a registrant, purchases used exclusively for exempt supplies (child care) still cannot claim any ITC.

16 答案 b

a. ✗ 错误。落入“多门生意分开算门槛”陷阱：$30,000门槛按人（连同关联人）计算，个体经营者名下所有应税生意必须合并加总（$19,000 + $15,000 = $34,000）。 / Wrong. This falls into the trap "testing the threshold separately for each business": the $30,000 threshold is measured per person (together with associates), and all taxable businesses held by the sole proprietor must be added together ($19,000 + $15,000 = $34,000).

b. ✓ 正确。Kevin在第3季度单个日历季度内合并应税供应达$34,000，触发“单季超过$30,000”路径：毫无缓冲期，从9月12日跨线那一笔交易本身起就失去小供应商（small supplier）身份并必须收税，且须在生效日后29天内完成注册。 / Correct. Kevin's combined taxable supplies reached $34,000 within a single calendar quarter in Q3, triggering the "over $30,000 in a single quarter" path: there is no grace period; he loses small supplier status from the very transaction on September 12 that crossed the line and must collect tax, and must complete registration within 29 days after the effective date.

c. ✗ 错误。落入“单季跨线误套缓冲期”陷阱：“超线季度结束后的下一个月末（10月31日）生效”仅适用于连续四季累计超$30,000但单季未超$30,000的第二条路径。 / Wrong. This falls into the trap "applying the grace period to a single-quarter breach": "effective at the end of the month after the quarter in which the line is crossed (October 31)" applies only to the second path, where the total exceeds $30,000 over four consecutive quarters but no single quarter exceeds $30,000.

d. ✗ 错误。单季突破$30,000没有等到下一季度初才生效的规则，跨线当笔交易（9月12日）本身就必须收取GST。 / Wrong. There is no rule that a single-quarter breach of $30,000 takes effect only at the start of the next quarter; the transaction that crosses the line (September 12) itself must collect GST.

16′ 答案 d

a. ✗ 错误。立即从跨线当笔交易起收税是“单个日历季度内超$30,000”的规则；Nadia每季均未超$30,000，走的是连续四季累计超线的第二条路径。 / Wrong. Collecting tax immediately from the transaction that crosses the line is the rule for "over $30,000 within a single calendar quarter"; no quarter of Nadia's exceeded $30,000, so she is on the second path, the cumulative breach over four consecutive quarters.

b. ✗ 错误。连续四季累计超线的路径给予一个月的缓冲期，她在超线季度结束后的下一个月末（1月31日）才失去小供应商身份，而非1月1日。 / Wrong. The four-quarter cumulative path gives a one-month grace period: she loses small supplier status at the end of the month after the quarter in which the line is crossed (January 31), not on January 1.

c. ✗ 错误。“30笔且$2,800”只是数字平台向CRA报送卖家信息的排除门槛，不改变纳税人自己的$30,000 GST/HST注册义务。 / Wrong. "30 transactions and $2,800" is only the exclusion threshold for digital platforms reporting seller information to the CRA; it does not change the taxpayer's own $30,000 GST/HST registration obligation.

d. ✓ 正确。连续四个日历季度累计超$30,000但单季未超线的，在超线季度（Q4，12月31日结束）后的下一个月末（2027年1月31日）失去小供应商（small supplier）身份，从2月1日起的第一笔应税供应开始收税，并在生效日后29天内完成注册。 / Correct. When the total exceeds $30,000 over four consecutive calendar quarters but no single quarter exceeds the line, small supplier status is lost at the end of the month after the quarter in which the line is crossed (Q4, ending December 31), January 31, 2027; tax is collected from the first taxable supply on February 1, and registration must be completed within 29 days after the effective date.

17 答案 a

a. ✓ 正确。进项凭证（ITC documentation）最低档为单笔含税低于$100，只需卖方名称、日期和总额，故$85小票完全合规；$500及以上属于高档，必须包含买方名称、货物或服务简述及付款条件，$620发票缺项故不合规。简化进项法（simplified method for claiming ITCs）资格为上财年（及本财年累计）全球应税收入不超$1,000,000，且上财年加拿大应税采购（含进口）不超$4,000,000。 / Correct. The lowest tier of ITC documentation is a single invoice under $100 tax-included, which needs only the seller's name, date and total, so the $85 receipt is fully compliant; $500 and over is the high tier and must include the buyer's name, a description of the goods or services and the payment terms, so the $620 invoice with missing items is not compliant. The simplified method for claiming ITCs requires worldwide taxable revenue of not more than $1,000,000 in the prior year (and the current year cumulatively), and Canadian taxable purchases (including imports) of not more than $4,000,000 in the prior year.

b. ✗ 错误。$30与$150是旧法门槛；2024年6月立法已将两档门槛上调至$100与$500，并追溯至2021年4月20日生效。 / Wrong. $30 and $150 are the old thresholds; legislation in June 2024 raised the two tiers to $100 and $500, retroactive to April 20, 2021.

c. ✗ 错误。$620发票已达$500高档门槛，缺少买方名称和付款条件在稽查时站不住；且$400,000是快速法（quick method）门槛，简化进项法也不会免除保存凭证的义务。 / Wrong. The $620 invoice has reached the $500 high-tier threshold, and lacking the buyer's name and payment terms will not stand up on audit; and $400,000 is the quick method threshold, and the simplified method does not remove the duty to keep documents.

d. ✗ 错误。$85低于$100无需登记号即有效，而$620缺少高档必填项；$1,500,000与$6,000,000是决定年报、季报、月报的申报周期（reporting period）门槛，而非简化进项法门槛。 / Wrong. The $85 receipt is under $100 and is valid without a registration number, while the $620 invoice lacks items required at the high tier; $1,500,000 and $6,000,000 are the thresholds that decide annual, quarterly and monthly reporting periods, not the simplified method threshold.

17′ 答案 c

a. ✗ 错误。ITC并非“当期不报就作废”，一般登记人享有长达4年的申领时效。 / Wrong. An ITC is not forfeited if not reported in the current period; a general registrant has a claim period of up to 4 years.

b. ✗ 错误。漏抵的ITC无需专门去修改旧报表，只要未过时效，可以直接加进后续某一期报表的第106行。 / Wrong. A missed ITC does not require amending the old return; as long as the limit has not expired, it can be added directly to line 106 of a later period's return.

c. ✓ 正确。一般登记人的进项税额抵免（input tax credit, ITC）时效为4年（仅门槛额超$6,000,000的大户与上市金融机构为2年），漏抵的ITC可直接并入未过4年时效的后续报告期第106行申报。 / Correct. The ITC claim limit for a general registrant is 4 years (only large registrants with threshold amounts over $6,000,000 and listed financial institutions have 2 years), and a missed ITC can be added directly to line 106 of a later reporting period still within the 4-year limit.

d. ✗ 错误。2年时效仅适用于门槛额超过$6,000,000的大户及上市金融机构，普通小微登记人的时效为4年。 / Wrong. The 2-year limit applies only to large registrants with threshold amounts over $6,000,000 and listed financial institutions; the limit for an ordinary small registrant is 4 years.

18 答案 d

a. ✗ 错误。落入“快速法第101行填不含税额”陷阱：将不含税的$100,000填入第101行并按$100,000 × 3.6% = $3,600计算，导致少算销项税。 / Wrong. This falls into the trap "entering the amount before tax on line 101 under the quick method": entering $100,000 before tax on line 101 and computing $100,000 x 3.6% = $3,600 understates the tax collected.

b. ✗ 错误。在快速法下违规抵扣了日常软件订阅的$600 GST（$3,780 − $300 − $100 − $600 = $2,780）；快速法下日常经营开销不可抵扣ITC。 / Wrong. This improperly deducts the $600 GST on everyday software subscriptions under the quick method ($3,780 – $300 – $100 – $600 = $2,780); everyday operating expenses earn no ITC under the quick method.

c. ✗ 错误。把新电脑的$140卑诗省PST也当成ITC抵扣了（$3,780 − $300 − $240 = $3,240）；卑诗省7% PST永远不能进第106行。 / Wrong. This claims the $140 of BC PST on the new computer as an ITC as well ($3,780 – $300 – $240 = $3,240); BC's 7% PST can never go on line 106.

d. ✓ 正确。快速法（quick method）下，第101行必须填含税应税供应额$105,000；卑诗省服务类汇款率（remittance rate）为3.6%，第103行 = $105,000 × 3.6% = $3,780；日常软件$600 GST不可抵，但新电脑属于资本资产（capital property），其$100 GST（不含$140 PST）仍可在第106行抵扣；第107行填前$30,000含税供应的1%抵免$300；第109行净税 = $3,780 − ($100 + $300) = $3,380。 / Correct. Under the quick method, line 101 must show tax-included taxable supplies of $105,000; the BC remittance rate for services is 3.6%, so line 103 = $105,000 x 3.6% = $3,780; the $600 GST on everyday software cannot be claimed, but the new computer is capital property, so its $100 GST (not the $140 PST) can still be claimed on line 106; line 107 holds the 1% credit of $300 on the first $30,000 of tax-included supplies; net tax on line 109 = $3,780 – ($100 + $300) = $3,380.

18′ 答案 b

a. ✗ 错误。记账、财务咨询、税务咨询与报税服务属于快速法明确点名排除的行业（excluded businesses），即使收入低于$400,000也不得使用快速法。 / Wrong. Bookkeeping, financial consulting, tax consulting and tax return preparation are expressly excluded businesses for the quick method, and the quick method cannot be used even with revenue under $400,000.

b. ✓ 正确。平面与网页设计不属于被排除行业，且其含税全球应税供应额（$220,000）未超过$400,000上限、已连续经营满365天，完全符合快速法（quick method）资格。 / Correct. Graphic and web design is not an excluded business, and its tax-included worldwide taxable supplies ($220,000) do not exceed the $400,000 ceiling and it has been operating for a full 365 days, so it fully qualifies for the quick method.

c. ✗ 错误。法律、会计与精算专业执业属于快速法点名排除的行业，无权选用快速法。 / Wrong. The practice of law, accounting and actuarial work are expressly excluded businesses for the quick method and have no right to elect it.

d. ✗ 错误。精算执业与财务咨询同属快速法点名排除的行业，不得选用快速法。 / Wrong. Actuarial practice and financial consulting are both expressly excluded businesses for the quick method and may not elect it.

19 答案 a

a. ✓ 正确。快速法（quick method）与T2125表（Form T2125）联动三步：① 已收税款与第103行应缴额的差额$1,464（$6,000 − $4,536）作为经营收入并入；② 1%抵免$300作为政府补助（government assistance）计入收入；③ 因日常开销不抵ITC，按含税额$18,900扣除，比常规法多扣$900。净增应税收入 = $1,464 + $300 − $900 = $864，恰好等于她在GST上省下的现金（$5,100 − $4,236 = $864）。 / Correct. The quick method links to Form T2125 in three steps: (1) the difference of $1,464 between tax collected and the amount remitted on line 103 ($6,000 – $4,536) is included as business income; (2) the 1% credit of $300 is included in income as government assistance; (3) because everyday expenses earn no ITC, they are deducted at the tax-included amount of $18,900, which is $900 more than under the regular method. Net increase in taxable income = $1,464 + $300 – $900 = $864, exactly equal to the cash she saves on GST ($5,100 – $4,236 = $864).

b. ✗ 错误。快速法留在口袋里的税款差额与1%抵免并不是免税横财，在所得税法上属于应税收入，必须并入T2125表。 / Wrong. The tax difference left in the pocket under the quick method and the 1% credit are not a tax-free windfall; under the Income Tax Act they are taxable income and must be added to T2125.

c. ✗ 错误。由于快速法下日常开销的$900 GST不能作为ITC抵回，该笔$900 GST在所得税上随开销按含税总额（$18,900）扣除，否则等于把已花掉的税又交了一次所得税。 / Wrong. Because the $900 of GST on everyday expenses cannot be recovered as an ITC under the quick method, that $900 of GST is deducted for income tax along with the expense at the tax-included total ($18,900); otherwise tax already spent would be taxed again.

d. ✗ 错误。只记住了开销按含税额多扣$900，却漏掉了必须计入收入的$1,464留存税款差额和$300政府补助。 / Wrong. This remembers only the extra $900 deducted at the tax-included amount, but misses the $1,464 difference in retained tax and the $300 of government assistance that must be included in income.

19′ 答案 c

a. ✗ 错误。将两个方法的数字算反了：常规法应缴为$13,000 − $2,600 = $10,400，而快速法应缴为$113,000 × 8.8% = $9,944。 / Wrong. This reverses the numbers of the two methods: under the regular method the amount payable is $13,000 – $2,600 = $10,400, while under the quick method it is $113,000 x 8.8% = $9,944.

b. ✗ 错误。$113,000 × 8.8% = $9,944，安大略省服务类的相等临界点在应税采购占营业额约23.5%（即$23,500）处，而非20%。 / Wrong. $113,000 x 8.8% = $9,944; the break-even point for Ontario services is at taxable purchases of about 23.5% of sales (that is, $23,500), not 20%.

c. ✓ 正确。安大略省服务类临界点为应税采购占不含税营业额约23.5%（1.13R × 8.8% = 0.09944R = 0.13R − 0.13P → P ≈ 23.5%R）。该顾问采购占比为20%（$20,000 ÷ $100,000）；快速法 = $100,000 × 1.13 × 8.8% = $9,944，常规法 = $100,000 × 13% − $20,000 × 13% = $13,000 − $2,600 = $10,400（低于四分之一），故快速法（$9,944）比常规法（$10,400）更省。 / Correct. The break-even point for Ontario services is taxable purchases of about 23.5% of sales before tax (1.13R x 8.8% = 0.09944R = 0.13R – 0.13P, so P is about 23.5% of R). This consultant's purchases are 20% ($20,000 / $100,000); quick method = $100,000 x 1.13 x 8.8% = $9,944, regular method = $100,000 x 13% – $20,000 x 13% = $13,000 – $2,600 = $10,400 (purchases are below one quarter of sales), so the quick method ($9,944) saves more than the regular method ($10,400).

d. ✗ 错误。无论在5%省还是13%/14%/15%的HST省，服务类快速法与常规法的应税采购临界点都落在营业额的23.3%至24.4%之间，采购占比低于该临界点时快速法更省。 / Wrong. Whether in a 5% province or a 13%/14%/15% HST province, the break-even point of taxable purchases between the quick method and the regular method for services lies between 23.3% and 24.4% of sales, and below that point the quick method saves more.

20 答案 c

a. ✗ 错误。自雇提供出租车与商业网约车（commercial ridesharing）客运服务是全国统一的例外，不适用$30,000门槛，必须从第一天起注册。 / Wrong. Self-employed taxi and commercial ridesharing passenger services are a nationwide exception, not subject to the $30,000 threshold, and must register from day one.

b. ✗ 错误。两处违规：一是网约车车费视为含税，应用$21,000 × 5/105 = $1,000倒算销项而非外加5%；二是保险费与车贷利息属于金融服务（豁免供应），本身不含GST，永远不能拆出ITC。 / Wrong. Two violations: first, ride-share fares are treated as tax-included, so collected tax should be back-calculated as $21,000 x 5/105 = $1,000, not 5% added on top; second, insurance premiums and car loan interest are financial services (exempt supplies), carry no GST themselves, and can never be split out as an ITC.

c. ✓ 正确。网约车司机必须从第一天起注册；车费视为含税，销项税 = $21,000 × 5/105 = $1,000；可抵进项税额抵免（ITC）= 燃油$3,150 × 5/105（$150）+ 平台服务费GST（$52.50）= $202.50；保险与利息不含GST，不可抵扣ITC。 / Correct. A ride-share driver must register from day one; fares are treated as tax-included, so tax collected = $21,000 x 5/105 = $1,000; claimable input tax credits (ITCs) = $3,150 of fuel x 5/105 ($150) + GST on the platform service fee ($52.50) = $202.50; insurance and interest carry no GST and earn no ITC.

d. ✗ 错误。“30笔且$2,800”仅适用于数字平台上卖货的卖家信息报送豁免（且客运服务根本无此豁免），与GST注册无关；此外平台向司机收取的服务费上的GST是完全可抵的进项。 / Wrong. "30 transactions and $2,800" applies only to the exemption from seller information reporting for sellers of goods on digital platforms (and passenger transportation services have no such exemption at all) and has nothing to do with GST registration; moreover, the GST on the service fee the platform charges the driver is a fully claimable input.

20′ 答案 b

a. ✗ 错误。卑诗省7% PST（$210）不是增值税，绝不能进第106行作ITC；且送餐、代购、跑腿不属于“客运服务”，仍适用一般$30,000门槛。 / Wrong. BC's 7% PST ($210) is not a value-added tax and can never go on line 106 as an ITC; and food delivery, errands and shopping on behalf of customers are not "passenger transportation services" and the general $30,000 threshold still applies.

b. ✓ 正确。卑诗省发票上12%的税只有5% GST（$150）可填入GST34第106行抵扣进项税额抵免（ITC），7% PST（$210）计入资产成本在所得税上折旧扣除；送餐服务不属于应税客运，不触发首日强制注册规则。 / Correct. Of the 12% tax on a BC invoice, only the 5% GST ($150) can be entered on GST34 line 106 as an input tax credit (ITC), and the 7% PST ($210) is added to the asset cost and depreciated for income tax; food delivery is not taxable passenger transportation and does not trigger the day-one mandatory registration rule.

c. ✗ 错误。无论在常规法还是快速法下，用于应税活动的资本资产（capital property）上的5%联邦GST均可合规抵扣ITC。 / Wrong. Whether under the regular method or the quick method, the 5% federal GST on capital property used in taxable activities may properly be claimed as an ITC.

d. ✗ 错误。将GST与PST的处理完全颠倒了：可抵ITC的是5% GST（$150），计入成本的是7% PST（$210），且送餐属于应税服务而非豁免供应。 / Wrong. This completely reverses the treatment of GST and PST: the 5% GST ($150) is claimable as an ITC, the 7% PST ($210) is added to cost, and food delivery is a taxable service, not an exempt supply.

21 答案 c

a. ✗ 错误。“财年结束后三个月（3月31日）同时申报并缴款”适用于有限公司或非12月31日财年结束的登记人；12月31日财年结束且有经营收入的个体经营者适用特殊的4月30日/6月15日规则。 / Wrong. "Filing and paying together three months after the fiscal year end (March 31)" applies to corporations or registrants whose fiscal year does not end on December 31; a sole proprietor with business income and a December 31 year end is under the special April 30 / June 15 rule.

b. ✗ 错误。落入“个体户6月15日才缴税”陷阱：6月15日只是报表提交截止日，税款必须在4月30日前缴清，否则从5月1日起按日计收不可抵扣的利息。 / Wrong. This falls into the trap "a sole proprietor paying tax only on June 15": June 15 is only the deadline for filing the return; the tax must be paid by April 30, or non-deductible interest runs daily from May 1.

c. ✓ 正确。同时满足“个体经营者（sole proprietor）、财年12月31日结束、当年有经营收入”三个条件时，GST/HST税款缴付截止日为次年4月30日（April 30），而GST34报表申报截止日为次年6月15日（June 15）。 / Correct. When all three conditions are met (a sole proprietor, fiscal year ending December 31, business income in the year), the GST/HST payment deadline is April 30 of the following year, and the GST34 filing deadline is June 15 of the following year.

d. ✗ 错误。把缴款日与申报日颠倒了：政府要求先在4月30日把税款交齐，报表可以宽限到6月15日提交。 / Wrong. This reverses the payment date and the filing date: the government requires the tax to be paid in full by April 30, while the return may be filed as late as June 15.

21′ 答案 a

a. ✓ 正确。“4月30日缴款、6月15日申报”仅适用于12月31日财年结束且有经营收入的个体经营者（sole proprietor）；有限公司（corporation）缺少“个体经营者”这一条件，退回“财年结束后3个月”的通则，即申报与缴款均在次年3月31日到期。 / Correct. "Pay by April 30, file by June 15" applies only to a sole proprietor with a December 31 year end and business income; a corporation lacks the condition of being a sole proprietor and falls back to the general rule of 3 months after the fiscal year end, so both filing and payment are due March 31 of the following year.

b. ✗ 错误。这是个体经营者的专属期限，有限公司不适用4月30日与6月15日规则。 / Wrong. This is a deadline specific to sole proprietors; the April 30 and June 15 rule does not apply to a corporation.

c. ✗ 错误。“报告期结束后1个月”是月报和季报的期限；年报的通则是财年结束后3个月（3月31日）。 / Wrong. "One month after the end of the reporting period" is the deadline for monthly and quarterly filers; the general rule for annual filers is 3 months after the fiscal year end (March 31).

d. ✗ 错误。混淆了T2企业所得税申报期（财年结束后6个月）与GST/HST年报申报期（财年结束后3个月）。 / Wrong. This confuses the T2 corporate income tax filing period (6 months after the fiscal year end) with the GST/HST annual filing period (3 months after the fiscal year end).

第 4 章答案与解析

22 答案 b

a. ✗ 错误。这是「网约车误套小供应商豁免」陷阱：商业性网约车载客属于出租车业务（taxi business），不适用 $30,000 小供应商（small supplier）豁免。 / Wrong. This is the trap "applying the small supplier exemption to ridesharing": commercial ridesharing passenger transport is a taxi business and the $30,000 small supplier exemption does not apply.

b. ✓ 正确。根据《消费税法》s.123(1) 对出租车业务（taxi business）的定义，商业性网约车载客无小供应商门槛（small supplier threshold），须从第一元收入起登记并收取 GST/HST；且网约车与送餐都做时，一旦登记，同一账户下的送餐收入必须跟着一起收税，不能分开处理。 / Correct. Under the definition of taxi business in s.123(1) of the Excise Tax Act, commercial ridesharing passenger transport has no small supplier threshold and must register and collect GST/HST from the first dollar; and when a person does both ridesharing and delivery, once registered, the delivery income in the same account must bear tax along with it and cannot be handled separately.

c. ✗ 错误。这是混合接单常见的「拆账豁免」误区：GST/HST 登记针对的是纳税人主体而非单一应用，一旦因网约车登记为注册人，名下所有应税商业活动（含送餐收入）都必须一并收税。 / Wrong. This is the common mixed-gig misconception of a "split-account exemption": GST/HST registration attaches to the taxpayer and not to a single app, and once registered because of ridesharing, all taxable commercial activities in that name (including delivery income) must collect tax together.

d. ✗ 错误。混淆了数字平台申报规则（DPI）中卖货排除线的 $2,800 与小供应商四季累计触发时点；网约车从第一元收入起就必须登记。 / Wrong. This confuses the $2,800 goods exclusion line in the digital platform reporting rules (DPI) with the four-quarter small supplier trigger point; ridesharing must register from the first dollar.

22′ 答案 c

a. ✗ 错误。落入「网约车误套小供应商豁免」陷阱：只要开始从事商业性网约车载客，该业务从第一元起就没有小供应商（small supplier）豁免。 / Wrong. This falls into the trap "applying the small supplier exemption to ridesharing": once the person begins commercial ridesharing passenger transport, that business has no small supplier exemption from the first dollar.

b. ✗ 错误。9 月 1 日之前她只做纯送餐且未满 $30,000，属于合法的小供应商期间，登记生效日锚定在开始提供网约车服务的 9 月 1 日，不会追溯对上半年的纯送餐收入征税。 / Wrong. Before September 1 she did only pure delivery and had not reached $30,000, a lawful small supplier period; the registration effective date is anchored on September 1, when she began providing rideshare services, and does not retroactively tax the first half-year of delivery income.

c. ✓ 正确。网约车业务（taxi business）从实际开始提供服务的第一天（9 月 1 日）起即须登记并收税；一旦成为 GST/HST 注册人，同一账户下后续发生的 $4,000 送餐收入也必须跟着一起收取 GST/HST。 / Correct. The rideshare business (taxi business) must register and collect tax from the first day it actually provides services (September 1); once a GST/HST registrant, the $4,000 of delivery income that follows in the same account must also collect GST/HST.

d. ✗ 错误。同一自雇个人登记 GST/HST 后，不能将网约车与送餐拆开处理，登记生效日之后的送餐收入必须一并收税。 / Wrong. After a self-employed individual registers for GST/HST, ridesharing and delivery cannot be handled separately; delivery income after the registration effective date must bear tax together.

23 答案 c

a. ✗ 错误。这是「只记四季累计、漏看单季越线」陷阱：超标季度结束后的下一个月末（10 月 31 日）失去小供应商身份，仅适用于「连续四季累计超 $30,000 但单季未超」的路径，不适用于单季直接突破 $30,000 的情况。 / Wrong. This is the trap "remembering only the four-quarter total and missing a single-quarter breach": losing small supplier status at the end of the month after the quarter (October 31) applies only to the path "over $30,000 across four consecutive quarters but no single quarter over", not to a direct breach of $30,000 within a single quarter.

b. ✗ 错误。单季触发（single-quarter trigger）不会追溯到该季度初的 7 月 1 日，越过门槛之前的 $27,000 仍属于小供应商期间的免登记收入。 / Wrong. The single-quarter trigger does not reach back to July 1, the start of the quarter; the $27,000 before crossing the threshold remains registration-free income from the small supplier period.

c. ✓ 正确。单一日历季度内累计应税供应额超过小供应商门槛（small supplier threshold）$30,000 时，适用单季触发路径：没有缓冲期，从使他超过门槛的那一笔供应（8 月 20 日的 $6,500 合同）起就必须全额收取 GST/HST，且注册生效日不得晚于当天。 / Correct. When taxable supplies within a single calendar quarter exceed the small supplier threshold of $30,000, the single-quarter path applies: there is no grace period, and from the supply that takes him over the threshold (the $6,500 contract on August 20) he must collect GST/HST in full, with the registration effective date no later than that day.

d. ✗ 错误。单季越线时，并非只对超出 $30,000 的 $3,500 差额收税，而是对「使你超过门槛的那一整笔供应」（即整笔 $6,500 合同）及其后的所有供应收取 GST/HST。 / Wrong. When the line is crossed within a single quarter, tax is not collected only on the $3,500 excess over $30,000; GST/HST is collected on the whole supply that takes you over the threshold (the entire $6,500 contract) and on all supplies after it.

23′ 答案 a

a. ✓ 正确。当连续四个日历季度累计超过 $30,000 但单季均未超过时，适用四季累计触发（four-quarter cumulative trigger）：在超过门槛所在季度（2026 年 Q3，9 月 30 日结束）结束后的下一个月末（10 月 31 日）失去小供应商身份，从 11 月 1 日起的第一笔供应开始收税。 / Correct. When the total over four consecutive calendar quarters exceeds $30,000 but no single quarter exceeds it, the four-quarter cumulative trigger applies: small supplier status is lost at the end of the month after the quarter in which the threshold was crossed (Q3 2026, ending September 30), which is October 31, and tax is collected from the first supply starting November 1.

b. ✗ 错误。把「单季触发（当笔立即生效）」与「四季累计触发」搞反了：单季仅 $7,200 并未突破 $30,000，四季累计超标享有一个自然月的缓冲期（至次月月底）。 / Wrong. This reverses the "single-quarter trigger (effective on the transaction)" and the "four-quarter cumulative trigger": the single quarter of only $7,200 did not break $30,000, and a four-quarter cumulative breach has a grace period of one calendar month (to the end of the next month).

c. ✗ 错误。四季累计超标的失效时点是超标季度结束后的「下一个月末」（10 月 31 日），而不是超标季度当季末（9 月 30 日）。 / Wrong. For a four-quarter cumulative breach the date status is lost is the "end of the month after" the quarter in which the line is crossed (October 31), not the end of that quarter (September 30).

d. ✗ 错误。$30,000 小供应商门槛是按「连续四个日历季度滚动累计」考核（含 2025 年 Q4），而不是只看单一自然年度（1 月至 12 月）。 / Wrong. The $30,000 small supplier threshold is tested on a rolling total of four consecutive calendar quarters (including Q4 2025), not by looking at a single calendar year (January to December).

24 答案 a

a. ✓ 正确。在数字平台运营方申报规则（Reporting Rules for Digital Platform Operators, DPI）下，全年少于 30 单且不超 $2,800 的排除卖家（excluded seller）豁免仅适用于「卖货」，不适用于网约车、送餐、短租等个人服务或租赁服务（relevant service）；只要他是当年提供过服务的活跃卖家（active seller），平台就必须在次年 1 月 31 日前将该记录报给 CRA。 / Correct. Under the Reporting Rules for Digital Platform Operators (DPI), the excluded seller exemption for fewer than 30 transactions and not over $2,800 in the year applies only to "sale of goods" and not to personal or rental services (relevant services) such as ridesharing, delivery and short-term rental; as long as he is an active seller who provided services during the year, the platform must report the record to the CRA by January 31 of the following year.

b. ✗ 错误。30 单与 $2,800 的卖货排除线并未废除，而 $500 是卖家拒绝向平台提供税号（TIN）的每次罚款金额，不是申报门槛。 / Wrong. The goods exclusion of 30 transactions and $2,800 has not been abolished, and $500 is the penalty each time a seller refuses to give the platform a tax identification number (TIN), not a reporting threshold.

c. ✗ 错误。网约车属于《所得税法》Part XX 明确覆盖的相关服务（relevant service），且 DPI 信息申报没有 $30,000 门槛（网约车在 GST/HST 上也无 $30,000 门槛）。 / Wrong. Ridesharing is a relevant service expressly covered by Part XX of the Income Tax Act, and DPI information reporting has no $30,000 threshold (ridesharing has none for GST/HST either).

d. ✗ 错误。DPI 属于法定强制第三方信息申报制度，不存在交费豁免申报的选项，$500 是不提供税号的法定罚款。 / Wrong. DPI is a statutory mandatory third-party information reporting regime; there is no option to pay a fee in exchange for exemption from reporting, and $500 is the statutory penalty for not providing a tax number.

24′ 答案 d

a. ✗ 错误。落入「服务类卖家误套卖货排除线」陷阱：不动产短租不属于销售货物，不能适用 30 单且 $2,800 的排除线。 / Wrong. This falls into the trap "applying the goods exclusion to service sellers": short-term rental of real property is not a sale of goods and cannot use the 30 transactions and $2,800 exclusion.

b. ✗ 错误。卖货类卖家只要全年少于 30 单且总额不超 $2,800 即可归为排除卖家（excluded seller），因此普里娅的卖货记录属于排除范围；$500 是不提供税号的罚款。 / Wrong. A goods seller with fewer than 30 transactions and a total not over $2,800 in the year is an excluded seller, so Priya's goods sales fall within the exclusion; $500 is the penalty for not providing a tax number.

c. ✗ 错误。恰好说反了：卖货有 30 单且 $2,800 的排除线，而不动产出租在 DPI 下没有任何金额或单数豁免。 / Wrong. This is exactly backwards: goods have an exclusion of 30 transactions and $2,800, while rental of real property has no amount or transaction-count exemption at all under DPI.

d. ✓ 正确。DPI 规则中的排除卖家（excluded seller）门槛（全年少于 30 单且不超 $2,800）仅适用于销售货物（普里娅满足条件被排除）；不动产出租（含短租）、网约车与送餐不适用该排除线，山姆即使只有 2 单也必须由平台按季汇总并在次年 1 月 31 日前报给 CRA。 / Correct. The excluded seller threshold in the DPI rules (fewer than 30 transactions and not over $2,800 in the year) applies only to the sale of goods (Priya meets it and is excluded); rental of real property (including short-term rental), ridesharing and delivery are not covered by this exclusion, and even with only 2 transactions, Sam's activity must be summarized by quarter by the platform and reported to the CRA by January 31 of the following year.

25 答案 d

a. ✗ 错误。这是「CPP 供款全额当成所得扣除」陷阱：自雇 CPP 不能整笔作为所得扣除；且第二层 CPP 附加供款（CPP2）只针对超过 YMPE $74,600（直至 YAMPE $85,000）的收入，她净收入 $50,000 未达 $74,600，不触发 CPP2。 / Wrong. This is the trap "treating the whole CPP contribution as an income deduction": self-employed CPP cannot be deducted in full as income; and the second additional CPP contribution (CPP2) applies only to income above the YMPE of $74,600 (up to the YAMPE of $85,000), and her net income of $50,000 does not reach $74,600, so CPP2 is not triggered.

b. ✗ 错误。雇主等价部分及增强部分属于所得扣除（line 22200），如果全部放进 line 31000 按最低税率算抵免，会低估自雇者的法定所得扣除额。 / Wrong. The employer-equivalent portion and the enhanced portion are income deductions (line 22200); putting all of it on line 31000 as a credit at the lowest rate would understate the self-employed person's statutory income deduction.

c. ✗ 错误。自雇者本人的 CPP 供款是通过附表 8（Schedule 8）计算后分别转入 T1 的 line 22200 与 line 31000，不能在 Form T2125 上作为商业经营费用扣除。 / Wrong. A self-employed person's own CPP contributions are calculated on Schedule 8 and then carried to line 22200 and line 31000 of the T1; they cannot be deducted on Form T2125 as a business operating expense.

d. ✓ 正确。($50,000 − $3,500) × 11.9% = $5,533.50。Schedule 8 把这笔钱按角色拆开：雇员等价的基础段供款走 line 31000 不可退还抵免（按最低税率抵税），雇主等价的基础段加上全部增强段走 line 22200 所得扣除（按边际税率抵税），所以两行金额并不相等；净收入 $50,000 未超过 2026 年 YMPE $74,600，不触发 CPP2。 / Correct. ($50,000 – $3,500) x 11.9% = $5,533.50. Schedule 8 splits this money by role: the employee-equivalent base contribution goes to the line 31000 non-refundable credit (tax relief at the lowest rate), while the employer-equivalent base portion plus all the enhanced portion goes to the line 22200 income deduction (tax relief at the marginal rate), so the two lines are not equal; net income of $50,000 does not exceed the 2026 YMPE of $74,600, so CPP2 is not triggered.

25′ 答案 b

a. ✗ 错误。line 31000 只接收雇员等价的基础 CPP 供款（不含增强段），增强部分与 CPP2 均不进 line 31000。 / Wrong. Line 31000 receives only the employee-equivalent base CPP contribution (excluding the enhanced portion); the enhanced portion and CPP2 do not go to line 31000.

b. ✓ 正确。根据讲义 2.3 节与术语表规则（Schedule 8 / line 22200 / line 31000）：基础层 CPP 供款拆成两半（雇主等价段进 line 22200 扣除，雇员等价段进 line 31000 不可退还抵免），而 2019 年 CPP 增强之后新增的部分（含 CPP2 全部）则全额在 line 22200 作为所得扣除。 / Correct. Under section 2.3 of the lecture and the glossary rule (Schedule 8 / line 22200 / line 31000): the base-tier CPP contribution is split into two halves (the employer-equivalent portion goes to the line 22200 deduction, the employee-equivalent portion to the line 31000 non-refundable credit), while the portion added after the 2019 CPP enhancement (including all of CPP2) is deducted in full on line 22200 as an income deduction.

c. ✗ 错误。50/50 拆分仅适用于一般层的基础段供款，2019 年增强段与 2024 年新增的 CPP2 层是全额作为所得扣除（line 22200）。 / Wrong. The 50/50 split applies only to the base-tier contribution; the 2019 enhanced portion and the CPP2 tier added in 2024 are deducted in full as income deductions (line 22200).

d. ✗ 错误。YMPE（$74,600）与 YAMPE（$85,000）之间的自雇 CPP2 供款全额可在 line 22200 抵扣应税所得。 / Wrong. Self-employed CPP2 contributions between the YMPE ($74,600) and the YAMPE ($85,000) are fully deductible from taxable income on line 22200.

26 答案 b

a. ✗ 错误。2025 年是他欠税超 $3,000 的第一年（前两年未超标），故 2025 年无需分期预缴；且 2026 年只要按 Form INNS1 提醒信上的金额按期缴纳（免计算选项），就不会被收分期利息。 / Wrong. 2025 was the first year his owing exceeded $3,000 (the prior two years did not), so no instalments were needed for 2025; and in 2026, paying on time the amounts on the Form INNS1 reminder letter (the no-calculation option) avoids instalment interest.

b. ✓ 正确。分期预缴（tax instalments）要求当年净欠税超 $3,000 且前两年至少有一年也超 $3,000：2025 年因前两年（2023、2024）都未超标故不必预缴；2026 年因 2025 与 2026 均超 $3,000 故必须预缴；照 Form INNS1 提醒信金额按期缴纳（「免计算」选项，2 月信管 3、6 月，8 月信管 9、12 月）即不会被收分期利息。 / Correct. Tax instalments require current-year net owing over $3,000 and at least one of the prior two years also over $3,000: for 2025 the prior two years (2023, 2024) did not exceed the threshold, so no instalments were needed; for 2026, since both 2025 and 2026 exceeded $3,000, instalments are required; paying on time the amounts on the Form INNS1 reminder letter (the "no-calculation" option: the February letter covers the March and June instalments, the August letter covers September and December) avoids instalment interest.

c. ✗ 错误。前两个税年的条件是「至少有一年」超过 $3,000（2024 或 2025），并非要求前两年全都超过 $3,000。 / Wrong. The condition for the prior two tax years is "at least one" over $3,000 (2024 or 2025), not that both of the prior two years exceeded $3,000.

d. ✗ 错误。混淆了加美规则：主动寄出 Form INNS1 提醒信、按信缴纳免利息是加拿大的机制；纳税人自行按安全港规则计算并主动缴纳、不靠税务局提醒是美国的机制。 / Wrong. This confuses the Canadian and US rules: the CRA proactively mailing a Form INNS1 reminder letter, with payment per the letter free of interest, is a Canadian mechanism; the taxpayer computing and paying on their own under the safe harbour rules without reminders from the tax authority is the US mechanism.

26′ 答案 d

a. ✗ 错误。加拿大的 $3,000 分期预缴门槛是长期未变的固定值，不随通胀指数化；且寄送 Form INNS1 提醒信的是加拿大 CRA，不是美国国税局。 / Wrong. Canada's $3,000 instalment threshold is a fixed value that has long been unchanged and is not indexed to inflation; and it is the Canada Revenue Agency, not the US IRS, that mails the Form INNS1 reminder letters.

b. ✗ 错误。$1,800 是魁北克省的门槛，其他省份为 $3,000，且加拿大需要「当年＋前两年至少一年」双重超标。 / Wrong. $1,800 is Quebec's threshold, while for other provinces it is $3,000, and Canada requires the double breach of the current year plus at least one of the prior two years.

c. ✗ 错误。讲义特别指出：把加拿大「等提醒信来」的习惯带到美国那一侧去用是跨境读者最常见的错误，美国不靠税务局寄信提醒，逾期会自动课处罚款。 / Wrong. The lecture specifically points out that carrying the Canadian habit of "waiting for the reminder letter" over to the US side is the most common mistake for cross-border readers; the US does not rely on the tax authority mailing reminders, and penalties are charged automatically when late.

d. ✓ 正确。加拿大分期预缴门槛为固定不指数化的 $3,000（当年且前两年至少一年超标），由 CRA 在 2 月和 8 月主动寄送 Form INNS1 提醒信；美国则由纳税人自己按安全港规则计算并主动缴纳，不靠税务局提醒，逾期自动罚款。 / Correct. Canada's instalment threshold is a fixed, non-indexed $3,000 (current year and at least one of the prior two years over), with the CRA proactively mailing Form INNS1 reminder letters in February and August; in the US the taxpayer computes under the safe harbour rules and pays proactively without reminders from the tax authority, and late payment draws automatic penalties.

27 答案 a

a. ✓ 正确。根据《所得税法》s.248(1) 对乘用车辆（passenger vehicle）定义的排除条款，取得当年超过 50% 用于出租车/网约车载客的车辆不算乘用车，不受 Class 10.1 购置成本、利息与租赁上限约束；虽然《所得税条例》Schedule II 将专用出租车（taxicab）列在 Class 16（40%），但多数报税实务将网约车按 Class 10（30%）处理。相反，专门用于送餐的车辆不适用出租车排除，仍须按乘用车规则和成本上限区分 Class 10 与 Class 10.1。 / Correct. Under the exclusion in the definition of passenger vehicle in s.248(1) of the Income Tax Act, a vehicle used more than 50% in the year of acquisition for carrying passengers as a taxi or rideshare is not a passenger vehicle and is not subject to the Class 10.1 caps on acquisition cost, interest and leasing; although Schedule II of the Income Tax Regulations lists dedicated taxicabs in Class 16 (40%), most filing practice treats ridesharing under Class 10 (30%). By contrast, a vehicle used exclusively for food delivery does not qualify for the taxi exclusion and must still follow the passenger vehicle rules and cost caps, split between Class 10 and Class 10.1.

b. ✗ 错误。忽略了《所得税法》s.248(1) 的关键分叉：取得当年超过 50% 用于网约车载客的车辆直接被排除在乘用车（passenger vehicle）定义之外，因此德文的车不受 Class 10.1 购置成本上限约束。 / Wrong. This overlooks the key fork in s.248(1) of the Income Tax Act: a vehicle used more than 50% in the year of acquisition for rideshare passengers is excluded from the definition of passenger vehicle, so Devon's car is not subject to the Class 10.1 acquisition cost cap.

c. ✗ 错误。乘用车排除条款只针对「出租车用途（载客）」，不针对「使用数字平台」；玛雅用于送餐的车辆即使商业使用比例达 80%，也落不进出租车例外，仍须受乘用车规则约束。 / Wrong. The passenger vehicle exclusion targets "taxi use (carrying passengers)", not "using a digital platform"; even if the business-use percentage of Maya's delivery vehicle is 80%, it does not fall within the taxi exception and remains subject to the passenger vehicle rules.

d. ✗ 错误。车辆是否排除于乘用车定义的判定发生在「取得车辆的那一年」（且德文取得当年已达 75% > 50%），之后的用途变化不会追溯改变取得当年的归类。 / Wrong. Whether a vehicle is excluded from the definition of passenger vehicle is decided "in the year the vehicle is acquired" (and Devon had already reached 75%, above 50%, in the year of acquisition); later changes in use do not retroactively change the classification in the year of acquisition.

27′ 答案 c

a. ✗ 错误。排除于乘用车（passenger vehicle）定义的 >50% 门槛专门看「网约车载客（出租车用途）」比例，不能把送餐配送的 35% 加进来凑数。 / Wrong. The over-50% threshold for exclusion from the definition of passenger vehicle looks only at the "ridesharing passengers (taxi use)" percentage; you cannot add in the 35% of food delivery to make up the number.

b. ✗ 错误。讲义明确指出：是否排除于乘用车定义的判定发生在「取得车辆的那一年」（2026 年），之后年度（2027 年）用途比例上升不会追溯改变归类。 / Wrong. The lecture states clearly that whether a vehicle is excluded from the definition of passenger vehicle is decided "in the year the vehicle is acquired" (2026); a rise in the use percentage in a later year (2027) does not retroactively change the classification.

c. ✓ 正确。车辆必须是在「取得当年」超过 50% 用于网约车载客才能排除在乘用车（passenger vehicle）定义之外（多数实务归入无上限的 Class 10 30%，法条对专用出租车列 Class 16 40%）；亚瑟取得当年载客仅占 40%，未过半，故仍须按乘用车类别与成本上限区分 Class 10 与 Class 10.1，且次年用途变化不追溯改变归类。 / Correct. To be excluded from the definition of passenger vehicle, the vehicle must be used more than 50% for rideshare passengers "in the year of acquisition" (most practice uses Class 10 at 30%, uncapped, while the legislation lists dedicated taxicabs in Class 16 at 40%); Arthur's passenger use in the year of acquisition was only 40%, not over half, so he must still follow the passenger vehicle classes and cost caps, split between Class 10 and Class 10.1, and a change of use in the following year does not retroactively change the classification.

d. ✗ 错误。讲义 3.5 节特别提醒：未排除于乘用车定义的车辆（含送餐车），应按乘用车类别和购车成本上限再区分 Class 10 与 Class 10.1，不能不论价格一律列为 Class 10.1。 / Wrong. Section 3.5 of the lecture specifically warns: a vehicle not excluded from the definition of passenger vehicle (including a delivery vehicle) should be split between Class 10 and Class 10.1 by passenger vehicle class and purchase cost cap, and cannot be put into Class 10.1 across the board regardless of price.

28 答案 c

a. ✗ 错误。这是「误把 DPI 副本总额直接当成应税营业额」陷阱：小费（tips）不计收 GST/HST，直接把含小费的 $61,400 当成收税车资会导致多算并多缴 5% 的 GST。 / Wrong. This is the trap of treating the DPI copy total directly as taxable sales: tips are not subject to GST/HST, and treating $61,400 including tips as fares on which tax is collected would overstate and overpay the 5% GST.

b. ✗ 错误。小费虽然不计收 GST/HST，但在个人所得税上仍属于应税收入，漏报这 $3,600 会导致所得税少报并与 CRA 掌握的 DPI 数据产生差异。 / Wrong. Although tips are not subject to GST/HST, they are still taxable income for personal income tax; omitting this $3,600 would understate income tax and create a difference from the DPI data the CRA holds.

c. ✓ 正确。平台在 DPI 规则下按日历季度上报对价与费用，对账应逐季核对；小费（tips，$3,600）不计入收取 5% BC GST 的基础车资（$57,800），但属于所得税应税收入，应在 Form T2125 的「其他收入」行单独申报。 / Correct. Under the DPI rules the platform reports consideration and fees by calendar quarter, so reconciliation should be done quarter by quarter; tips ($3,600) are not part of the base fares ($57,800) on which 5% BC GST is collected, but they are taxable income for income tax and should be reported separately on the "other income" line of Form T2125.

d. ✗ 错误。$3,600 是客户给他的小费收入而非平台扣除的佣金费用，且 2026 当年尚未过申报期，核对清楚后如实填报即可，无需走针对历史往年漏报的自愿披露计划（Voluntary Disclosures Program）。 / Wrong. The $3,600 is tip income the customers gave him, not a commission fee deducted by the platform, and the 2026 filing period has not yet passed, so after reconciling clearly he can simply report accurately without using the Voluntary Disclosures Program meant for omissions in past years.

28′ 答案 a

a. ✓ 正确。Part XX 信息申报表（Part XX information return）按日历季度拆列对价、笔数与扣费，只有逐季核对才能查出差额出在哪个季度；同时，不同平台对小费（tips）有的并入总额、有的单列，不先看清栏目说明，要么会在所得税上漏报或重报小费，要么会误对不收 GST/HST 的小费多算消费税。 / Correct. The Part XX information return lists consideration, number of transactions and fees by calendar quarter, so only by reconciling quarter by quarter can you find in which quarter the difference lies; also, different platforms either include tips in the total or list them separately, and without first reading the column notes you will either omit or double-report tips for income tax, or wrongly charge GST/HST on tips, which do not bear it.

b. ✗ 错误。平台不代扣 CPP 或 CPP2，且小费完全不收 GST/HST。 / Wrong. The platform does not withhold CPP or CPP2, and tips bear no GST/HST at all.

c. ✗ 错误。送餐属于个人服务，不适用「30 单且 $2,800」的卖货排除卖家（excluded seller）规则，且小费在所得税上并无 $2,800 免税额。 / Wrong. Food delivery is a personal service and is not under the "30 transactions and $2,800" excluded seller rule for goods, and tips have no $2,800 exemption for income tax.

d. ✗ 错误。DPI 是联邦《所得税法》Part XX 规则而非省级工伤保险报表（且 WorkSafeBC 保费由平台缴纳，不向配送员收），line 22200 是自雇 CPP 扣除行而非小费行。 / Wrong. DPI is a federal Part XX rule under the Income Tax Act, not a provincial workers' compensation report (and WorkSafeBC premiums are paid by the platform, not charged to delivery workers), and line 22200 is the self-employed CPP deduction line, not a tips line.

第 5 章答案与解析

29 答案 b

a. ✗ 跌入「混淆税务递延与永久免税」陷阱。11%的小企业综合税率只对留在公司里不分配的利润产生递延（tax deferral）；一旦利润全部取出花掉，个人层面还要补税，省税效果基本消失。 / This falls into the trap "confusing tax deferral with permanent tax exemption". The 11% small business combined rate produces tax deferral only on profit left in the company undistributed; once all profit is taken out and spent, personal tax must be topped up and the tax saving essentially disappears.

b. ✓ 正确。当利润全部取出用于个人开销时，税收整合原理（principle of integration）使总税负与自雇相差无几，递延价值趋近于零，但每年却要多付BC省年度维持费$43.39及高昂的T2专业报税费，净支出反而增加。 / Correct. When profit is all taken out for personal spending, the principle of integration makes the total tax close to that of self-employment and the deferral value approaches zero, but every year there is an extra BC annual maintenance fee of $43.39 and substantial T2 professional filing fees, so net spending actually increases.

c. ✗ 个人服务业务（PSB）取决于服务关系是否实质等同于雇员（incorporated employee），与公司净利润是否低于$100,000无关。 / A personal services business (PSB) depends on whether the service relationship is in substance the same as that of an employee (incorporated employee), and has nothing to do with whether the company's net profit is under $100,000.

d. ✗ 所有加拿大居民公司无论当年应税所得是否为零，每个税年都必须提交T2申报表（T2 Corporation Income Tax Return）。 / Every resident Canadian corporation must file a T2 Corporation Income Tax Return for every tax year, whether or not taxable income is zero for the year.

29′ 答案 d

a. ✗ $500,000是联邦与BC省小企业扣除的业务限额上限（business limit），不是最低起征门槛。 / $500,000 is the upper limit of the business limit for the federal and BC small business deduction, not a minimum starting threshold.

b. ✗ 股息税收抵免（DTC）没有$100,000公司利润的最低门槛限制。 / The dividend tax credit (DTC) has no minimum threshold of $100,000 of corporate profit.

c. ✗ 5%附加税是《所得税法》s.123.5针对个人服务业务（PSB）公司留存利润征收的税项，并非针对正常提取利润的附加税。 / The 5% additional tax is the tax under s.123.5 of the Income Tax Act on the retained profit of a personal services business (PSB) company, and is not a surtax on ordinary profit withdrawals.

d. ✓ 正确。税务递延（tax deferral）只在利润留在公司账上不分配时才成立；把钱全部取出来花掉时个人层面的税照交，再加上固定的公司年报费和T2会计费，总体反而倒贴。 / Correct. Tax deferral holds only when profit stays on the company's books undistributed; when all the money is taken out and spent, personal tax is still paid, and together with the fixed corporate annual report fee and T2 accounting fees, the overall result is actually a net loss.

30 答案 a

a. ✓ 正确。Devon属于挂公司雇员（incorporated employee），既未雇有超过5名全职员工，客户也不是关联公司，构成个人服务业务（PSB）。PSB所得失去小企业扣除（SBD）和13%一般税率减免（GRR），联邦按28%加5%附加税（ITA s.123.5）共33%，加BC省一般税率12%，合并税率高达45%，且费用扣除受ITA s.18(1)(p)严格限制。 / Correct. Devon is an incorporated employee, employs no more than 5 full-time employees and the client is not an associated corporation, so the company is a personal services business (PSB). PSB income loses the small business deduction (SBD) and the 13% general rate reduction (GRR); the federal rate is 28% plus the 5% additional tax (ITA s.123.5), a total of 33%, plus the BC general rate of 12%, for a combined rate as high as 45%, and expense deductions are strictly restricted by ITA s.18(1)(p).

b. ✗ 这是案例一指出的典型错报：把单一客户、无雇员的挂名雇员安排当成普通活跃经营报税，误套用11%小企业税率。 / This is the typical reporting error flagged in case one: treating an arrangement with a single client and no employees, a disguised employee, as ordinary active business and wrongly applying the 11% small business rate.

c. ✗ 《所得税法》s.123.4(1)明文将个人服务业务（PSB）收入排除在13%一般税率减免（GRR）之外，且还需另加5%的PSB附加税。 / Section 123.4(1) of the Income Tax Act expressly excludes personal services business (PSB) income from the 13% general rate reduction (GRR), and the 5% PSB additional tax is added as well.

d. ✗ 53.5%是BC省个人最高边际税率，而公司层面保留的PSB应税所得在BC省合并税率为45%。 / 53.5% is the BC top personal marginal rate, whereas the PSB taxable income retained at the corporate level bears a BC combined rate of 45%.

30′ 答案 b

a. ✗ 跌入「把单一客户绝对等同于PSB」的陷阱，忽略了「全年雇有超过5名全职员工」的法定豁免条件。 / This falls into the trap "treating single client as absolutely equal to PSB", overlooking the statutory exemption for "more than 5 full-time employees throughout the year".

b. ✓ 正确。个人服务业务（PSB）定义中明文规定，只要公司全年雇有超过五名全职员工（more than five full-time employees），或服务对象为关联公司，即豁免于PSB规则；雇有6名全职员工满足豁免，前$500,000活跃经营利润可享受11%的小企业综合税率。 / Correct. The definition of a personal services business (PSB) expressly provides that a company that employs more than five full-time employees throughout the year, or whose services are provided to an associated corporation, is exempt from the PSB rules; with 6 full-time employees the exemption is met, and the first $500,000 of active business income gets the 11% small business combined rate.

c. ✗ 满足超过5名全职员工豁免后，该公司完全脱离PSB定义，属于正常活跃经营收入，可以正常享受小企业扣除（SBD）和11%综合税率。 / Once the exemption of more than 5 full-time employees is met, the company is entirely outside the PSB definition, is ordinary active business income, and may enjoy the small business deduction (SBD) and the 11% combined rate as usual.

d. ✗ 「全年雇有超过5名全职员工」与「服务对象是关联公司」是「或（or）」的关系，满足其一即可豁免PSB，不需要同时满足。 / "More than 5 full-time employees throughout the year" and "services provided to an associated corporation" are in an "or" relationship; meeting either exempts the company from PSB, and both are not required.

31 答案 c

a. ✗ 跌入「误以为有限责任公司能隔绝所有税务个人追责」的陷阱。有限责任保护商业债务，但对未缴的源头代扣税款和GST/HST不成立。 / This falls into the trap "thinking a limited liability company shields against all personal tax liability". Limited liability protects against business debts, but does not hold for unremitted source deductions and GST/HST.

b. ✗ 挂名董事配偶即使不管钱，只要在任，同样对未缴代扣税款和GST/HST承担连带责任。 / Even if a nominal director spouse does not handle the money, as long as he or she is in office, he or she bears the same joint liability for unremitted source deductions and GST/HST.

c. ✓ 正确。根据《所得税法》s.227.1(1)，在任董事对公司拖欠的代扣税款和GST/HST（含利息与罚款）承担个人连带责任（director's liability）；唯一抗辩是证明已尽理性谨慎之人的勤勉尽责（s.227.1(3)），或卸任董事已满2年（s.227.1(4)）。 / Correct. Under s.227.1(1) of the Income Tax Act, directors in office are personally jointly liable (director's liability) for the company's unremitted source deductions and GST/HST (including interest and penalties); the only defences are to prove due diligence of a reasonably prudent person (s.227.1(3)), or that the director left office more than 2 years ago (s.227.1(4)).

d. ✗ 《所得税法》s.227.1(4)规定的董事追责时效是卸任董事之日起2年（two years），不是10年。 / The limitation period for directors under s.227.1(4) of the Income Tax Act is two years from the date the director ceased to be a director, not 10 years.

31′ 答案 a

a. ✓ 正确。公司的有限责任保护股东和董事不对$80,000商业货款承担个人责任；而对于$25,000代扣税款连带责任，根据ITA s.227.1(4)，追责时效为卸任董事之日起2年，2024年3月1日至2026年6月15日已超过2年。 / Correct. The company's limited liability protects shareholders and directors from personal liability for the $80,000 trade debt; as for the joint liability for $25,000 of source deductions, under ITA s.227.1(4) the limitation period is 2 years from the date the director ceased to be a director, and March 1, 2024 to June 15, 2026 is already more than 2 years.

b. ✗ 普通商业供应商债务受公司有限责任隔绝，且代扣税款追责已超过卸任后2年的法定时效。 / An ordinary commercial supplier debt is shielded by the company's limited liability, and assessment for source deductions is already beyond the statutory 2-year period after leaving office.

c. ✗ 卸任董事并不会立刻免除在任期间发生的代扣税款责任，必须等到卸任满2年后才过追责时效。 / A director who leaves office is not immediately released from the source deduction liability incurred during the term; the limitation period passes only after 2 years since leaving office.

d. ✗ 《所得税法》s.227.1(4)明确规定了卸任董事之日起2年的追责时效。 / Section 227.1(4) of the Income Tax Act expressly provides the limitation period of 2 years from the date the director ceased to be a director.

32 答案 d

a. ✗ 把公司报税截止日默认等同于个人报税的4月30日是自查清单第4条指出的典型错误；公司按各自年结日往后推算。 / Treating the company filing deadline as the same as the personal April 30 is the typical error flagged in item 4 of the self-check list; a company counts forward from its own year-end date.

b. ✗ 把申报截止日与欠税到期日弄反了：公司报税是「报表晚（6个月）、欠税早（2或3个月）」。 / This reverses the filing deadline and the balance-due date: for companies it is "return late (6 months), balance early (2 or 3 months)".

c. ✗ T2申报表确实在年结后6个月到期，但欠税必须在年结后2个月（符合条件的CCPC为3个月）内缴清，等到第6个月才交税会产生欠税利息。 / The T2 return is indeed due 6 months after year end, but the balance must be paid within 2 months after year end (3 months for a qualifying CCPC); waiting until month 6 to pay incurs interest on the balance.

d. ✓ 正确。公司年结日（注册后不满53周内任选一天，ITA s.249.1(1)(a)）之后，T2申报期限是年结后6个月，但欠税到期日是年结后2个月（符合条件的CCPC可延至3个月），呈现「报表晚、欠税早」的时间差。 / Correct. After the company's year end (any day within 53 weeks after incorporation, ITA s.249.1(1)(a)), the T2 filing deadline is 6 months after year end, but the balance-due date is 2 months after year end (extended to 3 months for a qualifying CCPC), producing the gap of "return late, balance early".

32′ 答案 b

a. ✗ 讲义明确指出，「今年公司没什么生意，先不报」不是合法选项；无活动、不赚钱的公司同样必须按年报T2。 / The lecture states clearly that "the company has little business this year, so I won't file" is not a lawful option; a company with no activity and no profit must still file a T2 every year.

b. ✓ 正确。无论当年有无经营活动或盈利，所有加拿大居民公司每个税年都必须在年结后6个月内申报T2，唯三例外是免税的王室公司、Hutterite群体与全年注册慈善机构。 / Correct. Whether or not there was activity or profit in the year, every resident Canadian corporation must file a T2 within 6 months after year end for every tax year, with only three exceptions: tax-exempt Crown corporations, Hutterite colonies and registered charities for the full year.

c. ✗ BC省的Annual Report（$43.39）是公司注册处的年度维持申报，不能替代向CRA提交的T2所得税申报表。 / BC's Annual Report ($43.39) is the annual maintenance filing with the Corporate Registry and cannot replace the T2 income tax return filed with the CRA.

d. ✗ 公司是独立纳税人，绝不能并入个人的T1或T2125表申报。 / A company is a separate taxpayer and must never be merged into the individual's T1 or T2125 for filing.

33 答案 a

a. ✓ 正确。如果只在BC一省经营却选联邦注册（$200），还必须在BC省另行办理省外注册（extra-provincial registration）再付$380（$350基本费＋$30核名），首年注册费合计$580，比直接在BC注册（$380）贵$200。 / Correct. If you operate only in BC but choose federal incorporation ($200), you must also complete extra-provincial registration in BC and pay $380 ($350 base fee + $30 name approval), so the first-year registration fees total $580, $200 more than direct BC incorporation ($380).

b. ✗ 跌入「忽略仅在BC一省经营时联邦注册须叠加省外注册费」的陷阱。联邦注册只给全国名称保护，在BC省落地经营仍须交$380省外注册费。 / This falls into the trap "overlooking that federal incorporation with business only in BC needs an added extra-provincial fee". Federal incorporation gives only national name protection, and to operate on the ground in BC you still pay the $380 extra-provincial registration fee.

c. ✗ 选联邦《加拿大商业公司法》（CBCA）还是BC省《公司法》注册与税率完全无关；只要是CCPC，联邦注册与省注册享受的小企业税率完全一样。 / Whether you incorporate under the federal Canada Business Corporations Act (CBCA) or the BC Business Corporations Act has nothing to do with tax rates; as long as it is a CCPC, a federal and a provincial corporation enjoy exactly the same small business rate.

d. ✗ 联邦注册的CCPC在BC省经营同样适用BC省2%的小企业税率，注册辖区不影响公司税率。 / A federally incorporated CCPC operating in BC is likewise subject to BC's 2% small business rate; the jurisdiction of incorporation does not affect the corporate tax rate.

33′ 答案 c

a. ✗ $30是BC省注册时的名称核准费（name approval fee），不是年度维持费。 / $30 is the name approval fee at BC incorporation, not an annual maintenance fee.

b. ✗ $200和$380是首次注册费，不是每年的年度申报维持费。 / $200 and $380 are first-time registration fees, not yearly annual filing maintenance fees.

c. ✓ 正确。联邦公司每年网上提交Annual Return只需$12，而BC省内公司每年提交Annual Report需$43.39；跨多省经营且需要全国名称保护时，联邦注册更有价值。 / Correct. A federal corporation filing its Annual Return online each year pays only $12, while a BC company filing its Annual Report each year pays $43.39; when operating in several provinces and needing national name protection, federal incorporation is more valuable.

d. ✗ 向CRA报T2不能免除公司注册处的年度维持费（Annual Return / Annual Report），不交年报费可能导致公司失去良好状态（good standing）甚至被强制解散。 / Filing a T2 with the CRA does not exempt a company from the Corporate Registry's annual maintenance (Annual Return / Annual Report); not paying the annual report fee can cost the company its good standing or even lead to forced dissolution.

34 答案 d

a. ✗ 跌入「误以为独资出售资产也能用LCGE」的陷阱。独资或合伙生意的资产（设备、存货、商誉）处置根本不适用终身资本利得豁免。 / This falls into the trap "thinking a sole proprietor selling assets can also use the LCGE". The disposition of the assets (equipment, inventory, goodwill) of a sole proprietorship or partnership business does not qualify for the lifetime capital gains exemption at all.

b. ✗ 合格小企业公司股份（QSBCS）要求公司90%以上的资产用于活跃经营，囤积60%被动股票投资的公司股份不符合QSBCS条件。 / Qualified small business corporation shares (QSBCS) require over 90% of the company's assets to be used in active business, and shares of a company hoarding 60% passive stock investments do not meet the QSBCS conditions.

c. ✗ QSBCS一般要求满足持股满24个月等条件，未满足条件无法直接享受豁免。 / QSBCS generally requires conditions such as shares held for 24 months; without meeting them the exemption cannot be enjoyed directly.

d. ✓ 正确。2026税年终身资本利得豁免额（LCGE）为$1,275,000（对应扣除上限$637,500），仅适用于处置合格小企业公司股份（QSBCS，须满足CCPC、90%以上资产用于活跃经营、持股满24个月等条件）。 / Correct. For the 2026 tax year the lifetime capital gains exemption (LCGE) is $1,275,000 (with a corresponding deduction limit of $637,500), and applies only to the disposition of qualified small business corporation shares (QSBCS, which must meet conditions such as being a CCPC, over 90% of assets used in active business and shares held for 24 months).

34′ 答案 c

a. ✗ $1,016,836是2024年6月25日之前的旧豁免限额，不是2026税年的现行数字。 / $1,016,836 is the old exemption limit before June 25, 2024, not the current figure for the 2026 tax year.

b. ✗ $500,000是小企业扣除（SBD）的年度活跃经营业务限额（business limit），不是终身资本利得豁免额。 / $500,000 is the annual active business income limit for the small business deduction (SBD), the business limit, not the lifetime capital gains exemption amount.

c. ✓ 正确。终身资本利得豁免（LCGE）在2024-06-25提高到$1,250,000，2026税年恢复指数化后升至$1,275,000，对应扣除上限为$637,500。 / Correct. The lifetime capital gains exemption (LCGE) was raised to $1,250,000 on 2024-06-25, and with indexing restored for the 2026 tax year it rises to $1,275,000, with a corresponding deduction limit of $637,500.

d. ✗ $1,250,000是2024-06-25起未指数化前的基数，2026税年恢复指数化后已升至$1,275,000。 / $1,250,000 is the base amount from 2024-06-25 before indexing; with indexing restored for the 2026 tax year it has risen to $1,275,000.

35 答案 a

a. ✓ 正确。政府围绕小企业低税率设了三道防线：一是被动收入递减（passive income grind），被动投资收入从$50,000起逐步削减$500,000业务限额，到$150,000归零；二是向未实际参与经营的家庭成员发股息会触发分拆收入税（tax on split income, TOSI）按最高档课税；三是个人服务业务（PSB）规则。 / Correct. The government has set three guardrails around the low small business rate: first, the passive income grind, under which passive investment income above $50,000 progressively reduces the $500,000 business limit, reaching zero at $150,000; second, dividends paid to family members who do not actually take part in the business trigger the tax on split income (TOSI) at the top rate; third, the personal services business (PSB) rules.

b. ✗ $10M至$50M是应税资本递减（taxable capital grind）的区间，而被动收入递减从$50,000起算、$150,000归零。 / $10M to $50M is the range of the taxable capital grind, whereas the passive income grind runs from $50,000, reaching zero at $150,000.

c. ✗ 被动收入超过$150,000只会把$500,000小企业扣除限额削减为零（改按27%一般公司综合税率交税），不会将公司定性为45%税率的个人服务业务（PSB）。 / Passive income over $150,000 only cuts the $500,000 small business deduction limit to zero (so the income is taxed at the 27% general corporate combined rate); it does not turn the company into a personal services business (PSB) at 45%.

d. ✗ 向未实质参与经营的家庭成员发放股息会触发分拆收入税（TOSI），按个人最高档税率课税，绝不会按11%课税。 / Dividends paid to family members who do not substantially take part in the business trigger the tax on split income (TOSI), taxed at the top personal rate, and never at 11%.

35′ 答案 c

a. ✗ 省外注册费、GIFI附表和53周年结日规则属于日常行政与报税程序，不是防止滥用低税率的反避税防线。 / Extra-provincial registration fees, the GIFI schedule and the 53-week year-end rule are ordinary administrative and filing procedures, not anti-avoidance guardrails that stop abuse of the low rate.

b. ✗ 毛额化、股息税收抵免和10%联邦省份减让是计算正常税负与税收整合的基础机制，不是防滥用防线。 / The gross-up, the dividend tax credit and the 10% federal abatement for provinces are the basic mechanisms for calculating normal tax and integration, not guardrails against abuse.

c. ✓ 正确。讲义第1.4节明确列出围绕活跃经营低税率的三道防线：被动收入递减（passive income grind，$50,000起、$150,000归零）、分拆收入税（TOSI）、以及个人服务业务（PSB）。 / Correct. Section 1.4 of the lecture expressly lists three guardrails around the low active business rate: the passive income grind ($50,000 start, zero at $150,000), the tax on split income (TOSI), and the personal services business (PSB).

d. ✗ LCGE、第85条转让（s.85 rollover）和3个月欠税宽限期都是对符合条件纳税人的优惠或递延机制，而非反避税惩罚防线。 / The LCGE, the s.85 rollover and the 3-month balance-due extension are all benefits or deferral mechanisms for qualifying taxpayers, not anti-avoidance penalty guardrails.

第 6 章答案与解析

36 答案 b

a. ✗ 错误。小企业扣除（SBD）要求公司在整个税年内都是加拿大受控私人公司（CCPC）；一旦在年中被非居民取得控制权，不能把全年合并当作 CCPC 处理。 / Wrong. The small business deduction (SBD) requires the company to be a Canadian-controlled private corporation (CCPC) throughout the tax year; once a non-resident acquires control mid-year, the whole year cannot be treated as CCPC.

b. ✓ 正确。根据《所得税法》s.125(7)，被一个或多个非居民控制的公司不再是 CCPC；控制权被取得或 CCPC 身份改变会触发视同年结（deemed year-end，ITA s.249(4)、s.249(3.1)），交割前的短税年仍可按天数比例享 11% 合并低税率（联邦 9% + BC 2%），交割后的税年起失去 CCPC 资格，全部按 27% 合并一般税率（联邦 15% + BC 12%）计税，且需多报一份 T2。 / Correct. Under s.125(7) of the Income Tax Act, a company controlled by one or more non-residents is no longer a CCPC; the acquisition of control or a change in CCPC status triggers a deemed year-end (ITA s.249(4), s.249(3.1)); the short tax year before closing can still enjoy the 11% combined low rate (federal 9% + BC 2%) prorated by days, from the tax year after closing the CCPC status is lost and everything is taxed at the 27% combined general rate (federal 15% + BC 12%), and an additional T2 must be filed.

c. ✗ 错误。公司是独立纳税人，不会按股东持股比例把公司利润拆成两档税率；非居民持有 55% 表决权股份已构成法律上的控制（de jure control），踩中 CCPC 三条否定条件之一，整家公司失去 CCPC 身份。 / Wrong. A company is a separate taxpayer and its profit is not split into two rate bands by the shareholders' proportions; a non-resident holding 55% of the voting shares already amounts to legal control (de jure control), meeting one of the three negative CCPC conditions, and the whole company loses CCPC status.

d. ✗ 错误。失去 CCPC 身份不会追溯剥夺交割前那段期间的 CCPC 待遇，而是通过视同年结把一年切成两个税年：前一段短税年仍享按天数摊分的 SBD，后一段才按一般税率计税。 / Wrong. Losing CCPC status does not retroactively strip CCPC treatment from the period before closing; the deemed year-end cuts the year into two tax years: the earlier short tax year still enjoys the SBD prorated by days, and only the later one is taxed at the general rate.

36′ 答案 d

a. ✗ 错误。CCPC 定义中的「控制」不仅看表决权多数的法律控制（de jure control），还包括事实上的控制（de facto control）；不能只看 60% 的表面持股比例。 / Wrong. "Control" in the CCPC definition looks not only at legal control by a voting majority (de jure control) but also at de facto control; you cannot look only at the face shareholding of 60%.

b. ✗ 错误。虽然公司自身股份未上市，但 CCPC 的三条否定条件还包括「不得被公众公司控制」；踩中三条否定中的任何一条即丧失 CCPC 资格。 / Wrong. Although the company's own shares are not listed, the three negative CCPC conditions also include "not controlled by a public corporation"; meeting any one of the three negative conditions loses CCPC status.

c. ✗ 错误。CCPC 是一个非黑即白的开关，不存在按公众公司持股比例打折享受小企业扣除（SBD）的规则。 / Wrong. CCPC is an on-off switch; there is no rule prorating the small business deduction (SBD) by a public corporation's shareholding.

d. ✓ 正确。根据 ITA s.125(7) 及 CRA 口径，CCPC 判定中的控制既包括法律控制（de jure control）也包括事实控制（de facto control）；公众公司虽然只持股 40%，但实际能左右董事会，构成事实控制，因此该公司不是 CCPC，无法享受 9% 联邦低税率、2% BC 省低税率及三个月欠税宽限期。 / Correct. Under ITA s.125(7) and the CRA's position, control in the CCPC test includes both legal control (de jure control) and de facto control; although the public corporation holds only 40%, it can in practice steer the board, which constitutes de facto control, so the company is not a CCPC and cannot enjoy the 9% federal low rate, the 2% BC low rate or the three-month balance-due grace period.

37 答案 a

a. ✓ 正确。税年不足 51 周的短税年（short tax year），必须按「税年天数 ÷ 365」缩减经营限额（business limit，ITA s.125(5)(b)）：$500,000 × 306 ÷ 365 = $419,178。因此前 $419,178 享 11% 合并低税率（联邦 9% + BC 2%），超出的 $460,000 − $419,178 = $40,822 落入 27% 合并一般税率（联邦 15% + BC 12%）。 / Correct. A short tax year of fewer than 51 weeks must reduce the business limit by "days in the tax year / 365" (ITA s.125(5)(b)): $500,000 x 306 / 365 = $419,178. So the first $419,178 gets the 11% combined low rate (federal 9% + BC 2%), and the excess of $460,000 – $419,178 = $40,822 falls under the 27% combined general rate (federal 15% + BC 12%).

b. ✗ 错误。这是「短税年不摊经营限额」的常见陷阱；新公司首年几乎都是不足 51 周的短税年，必须按天数除以 365 缩减 $500,000 限额。 / Wrong. This is the common trap "not prorating the business limit in a short tax year"; a new company's first year is almost always a short tax year of fewer than 51 weeks, and the $500,000 limit must be reduced by days over 365.

c. ✗ 错误。短税年按天数摊分的是经营限额（business limit），而不是税率；税率依然是限额内 11%、限额外 27%。 / Wrong. What is prorated by days in a short tax year is the business limit, not the rate; the rate remains 11% within the limit and 27% above it.

d. ✗ 错误。同时踩中两个陷阱：一是把经营限额当成免税额（限额内的 $419,178 仍须按 11% 交税），二是把超限额的 $40,822 按 11% 算（超限额部分应按 27% 一般税率交税）。 / Wrong. This steps on two traps at once: first, treating the business limit as a tax-free allowance (the $419,178 within the limit must still bear 11% tax), and second, taxing the $40,822 over the limit at 11% (the part over the limit should bear the 27% general rate).

37′ 答案 c

a. ✗ 错误。直接用 $120,000 乘 19% 漏掉了短税年限额摊分：73 天的经营限额已缩减为 $500,000 × 73 ÷ 365 = $100,000，低于 $120,000 的收入。 / Wrong. Multiplying $120,000 directly by 19% misses the short tax year limit allocation: the business limit for 73 days is reduced to $500,000 x 73 / 365 = $100,000, which is below the income of $120,000.

b. ✗ 错误。既没有按 73 ÷ 365 缩减短税年经营限额，也没有遵循「四数取最小」原则。 / Wrong. This neither reduces the short tax year business limit by 73 / 365 nor follows the principle of "the least of four numbers".

c. ✓ 正确。73 天短税年的经营限额（line 410）必须按 $500,000 × 73 ÷ 365 缩减为 $100,000；再将经营收入 $120,000、应税收入 $120,000 与摊分后限额 $100,000 取最小值得 $100,000，联邦 SBD = $100,000 × 19% = $19,000。 / Correct. The business limit (line 410) for a 73-day short tax year must be reduced to $500,000 x 73 / 365 = $100,000; taking the least of business income of $120,000, taxable income of $120,000 and the allocated limit of $100,000 gives $100,000, so the federal SBD = $100,000 x 19% = $19,000.

d. ✗ 错误。$9,000（9% × $100,000）是限额内收入扣除 SBD 后的联邦应缴税额，而联邦 SBD 扣除额本身应按 19% 计算，即 $19,000。 / Wrong. $9,000 (9% x $100,000) is the federal tax payable on income within the limit after the SBD, whereas the federal SBD deduction itself should be calculated at 19%, that is, $19,000.

38 答案 c

a. ✗ 错误。这是把两条递减相加的典型陷阱。《所得税法》s.125(5.1) 明确规定两条递减取大者（exceeds the greater of），不叠加。 / Wrong. This is the typical trap of adding the two reductions. Section 125(5.1) of the Income Tax Act expressly provides that the greater of the two reductions applies (exceeds the greater of), and they are not cumulative.

b. ✗ 错误。制造公司同样受应税资本递减（taxable capital reduction）约束，而且两条递减应取大者（$200,000）而非取小者（$150,000）。 / Wrong. A manufacturing company is equally subject to the taxable capital reduction, and the greater of the two reductions ($200,000) applies, not the lesser ($150,000).

c. ✓ 正确。按 2026 现行规则（$10,000,000 至 $50,000,000 线性递减，分母 $90,000），应税资本递减额为 $500,000 × [0.225% × ($26,000,000 − $10,000,000)] ÷ $90,000 = $200,000；被动收入递减额为 5 × ($80,000 − $50,000) = $150,000；两条递减取大者（$200,000），故递减后经营限额为 $500,000 − $200,000 = $300,000。对比 2022 年 4 月 7 日之前开始的税年适用的旧规则（应税资本在 $10,000,000 至 $15,000,000 递减、$15,000,000 归零）：按旧规则 $26,000,000 已超 $15,000,000，经营限额直接为 $0。 / Correct. Under the current 2026 rule (linear reduction from $10,000,000 to $50,000,000, denominator $90,000), the taxable capital reduction is $500,000 x [0.225% x ($26,000,000 – $10,000,000)] / $90,000 = $200,000; the passive income reduction is 5 x ($80,000 – $50,000) = $150,000; the greater of the two reductions ($200,000) applies, so the reduced business limit is $500,000 – $200,000 = $300,000. By contrast, under the old rule for tax years beginning before April 7, 2022 (taxable capital reducing from $10,000,000 to $15,000,000, reaching zero at $15,000,000), $26,000,000 is already above $15,000,000, and the business limit would be directly $0.

d. ✗ 错误。应税资本递减和被动收入递减看的全都是「上一税年（preceding tax year）」整个联营组的数字，本税年有没有被动收入不影响本年的限额递减。 / Wrong. Both the taxable capital reduction and the passive income reduction look at the numbers of the whole associated group for the "preceding tax year"; whether there was passive income in the current tax year does not affect this year's limit reduction.

38′ 答案 b

a. ✗ 错误。把应税资本递减 $25,000 与被动收入递减 $200,000 直接相加了；两条递减必须取大者，不能叠加扣除。 / Wrong. This adds the taxable capital reduction of $25,000 and the passive income reduction of $200,000 together; the two reductions must take the greater and cannot be stacked.

b. ✓ 正确。按 2026 现行规则，应税资本递减额为 $500,000 × [0.225% × ($12,000,000 − $10,000,000)] ÷ $90,000 = $25,000（若按 2022 年 4 月 7 日前开始的税年的旧分母 $11,250 算则为 $200,000）；被动收入递减额为 5 × ($90,000 − $50,000) = $200,000。两条取大者即 $200,000，因此递减后经营限额为 $500,000 − $200,000 = $300,000。 / Correct. Under the current 2026 rule, the taxable capital reduction is $500,000 x [0.225% x ($12,000,000 – $10,000,000)] / $90,000 = $25,000 (using the old denominator of $11,250 for tax years beginning before April 7, 2022 it would be $200,000); the passive income reduction is 5 x ($90,000 – $50,000) = $200,000. The greater of the two is $200,000, so the reduced business limit is $500,000 – $200,000 = $300,000.

c. ✗ 错误。税法规定两条递减取大者（greater of），纳税人不能自行选择较小的递减额。 / Wrong. The law provides that the greater of the two reductions applies, and the taxpayer cannot choose the smaller reduction.

d. ✗ 错误。被动收入（AAII）从 $50,000 起每超 $1 削减 $5 限额，要到 $150,000 时才会把 $500,000 限额全部归零，$90,000 只削减 $200,000。 / Wrong. Passive income (AAII) cuts the limit by $5 for each $1 over $50,000, and the $500,000 limit goes to zero entirely only at $150,000; $90,000 cuts only $200,000.

39 答案 b

a. ✗ 错误。这是「见到配偶各开公司就判联营」的高频陷阱；仅有婚姻或亲属关系而无交叉持股（且无同一控制或第三家公司穿透）并不构成联营。 / Wrong. This is the high-frequency trap "deeming spouses' separate companies associated"; mere marriage or family relationship without cross-ownership (and without common control or look-through via a third company) does not constitute association.

b. ✓ 正确。亲属分别控制两家公司时，必须同时满足「其中一人在两家公司中均持有某一类非指定股份 25% 或以上」才构成联营（associated corporations）。零交叉持股时两家不联营，各自享有 $500,000 限额，$380,000 与 $260,000 全部按 11% 计税（共 $70,400）；当王先生持有对方 30% 普通股时，超过 25% 门槛触发联营，两家必须共填 Schedule 23 分摊一个 $500,000 限额，超出的 $140,000 按 27% 计税（多交 $140,000 × 16% = $22,400）。 / Correct. When relatives separately control two companies, association (associated corporations) exists only if "one of them holds 25% or more of some class of non-specified shares in both companies". With zero cross-ownership the two are not associated, each enjoys a $500,000 limit, and $380,000 and $260,000 are all taxed at 11% (a total of $70,400); when Mr. Wang holds 30% of the common shares of the other, the 25% threshold is exceeded and association is triggered, so the two must file Schedule 23 together to share one $500,000 limit, and the excess of $140,000 is taxed at 27% (an extra $140,000 x 16% = $22,400).

c. ✗ 错误。亲属控制两家公司时的交叉持股红线是 25%（某一类非指定股份），不是 50%。 / Wrong. The cross-ownership line for companies controlled by relatives is 25% (of some class of non-specified shares), not 50%.

d. ✗ 错误。联营 CCPC 必须通过 Schedule 23 分摊同一个 $500,000 限额，且各家分摊比例合计不得超过 100%；若合计超过 100% 或拒不提交，CRA 会直接调整或自行分配。 / Wrong. Associated CCPCs must share a single $500,000 limit through Schedule 23, with the allocation percentages totalling no more than 100%; if the total exceeds 100% or the form is not filed, the CRA will adjust directly or allocate on its own.

39′ 答案 a

a. ✓ 正确。第六条联营规则是穿透第三家公司（A 与 B 都和 C 联营，则 A 与 B 视为联营）；若第三家公司 C 提交 Schedule 28 切断穿透联营，代价是从 C 那里流过来的、原本被视为经营收入的投资收入不能享受小企业扣除（SBD）。 / Correct. The sixth association rule is look-through via a third company (if A and B are both associated with C, then A and B are deemed associated); if the third company C files Schedule 28 to cut the look-through association, the price is that the investment income flowing from C, otherwise treated as business income, cannot enjoy the small business deduction (SBD).

b. ✗ 错误。$1,000 罚款是 ITA s.162(7.2) 针对「应电子申报 T2 而未电子申报」的处罚，与 Schedule 28 无关。 / Wrong. The $1,000 penalty is under ITA s.162(7.2) for "failing to file a T2 electronically when required" and has nothing to do with Schedule 28.

c. ✗ 错误。提交 Schedule 28 的目的正是让 Alpha 和 Beta 保持不联营从而各自享受 CCPC 的 SBD 限额，不会导致丧失 CCPC 身份。 / Wrong. The very purpose of filing Schedule 28 is to keep Alpha and Beta not associated so that each enjoys its own CCPC SBD limit; it does not cause loss of CCPC status.

d. ✗ 错误。Schedule 50 是持股 10% 以上股东信息表，而 Schedule 28 是具有明确税务代价的法定选择表（切断穿透后，来自该公司的视同经营投资收入不得享 SBD）。 / Wrong. Schedule 50 is the shareholder information schedule for holders of 10% or more, while Schedule 28 is a statutory election form with a clear tax cost (after cutting the look-through, the deemed business investment income from that company cannot enjoy the SBD).

40 答案 c

a. ✗ 错误。把欠税截止日（balance-due day）和申报截止日（年结后 6 个月，即 2027 年 5 月 10 日）混为一谈了；且免除分期预缴的门槛是应缴税额不超过 $3,000，而不是应税收入不超过 $500,000。 / Wrong. This confuses the balance-due day with the filing deadline (6 months after year end, which is May 10, 2027); and the threshold for exemption from instalments is tax payable of no more than $3,000, not taxable income of no more than $500,000.

b. ✗ 错误。该公司满足全年 CCPC、申领 SBD 且上年应税收入未超限额，欠税截止日享 3 个月宽限（2027 年 2 月 10 日）而非 2 个月；年结日不在月末（11 月 10 日），6 个月后的申报截止日是第六个月的同一日（5 月 10 日）而非月末；且因 8 月 GST 迟缴打破了前 12 个月完美合规记录，不能按季预缴。 / Wrong. This company was a CCPC throughout the year, claimed the SBD and had prior-year taxable income within the limit, so the balance-due day enjoys the 3-month grace (February 10, 2027) rather than 2 months; the year end is not at month end (November 10), so the filing deadline 6 months later is the same day of the sixth month (May 10) rather than month end; and because the late GST payment in August broke the perfect compliance record of the prior 12 months, it cannot pay quarterly.

c. ✓ 正确。第一，符合条件的 CCPC（全年为 CCPC、申领 SBD、上年应税收入未超限额）欠税截止日（balance-due day）为年结后 3 个月，即 2027 年 2 月 10 日；第二，年结日 11 月 10 日不在月末，申报截止日为年结后第 6 个月的同一日，即 2027 年 5 月 10 日；第三，上年与本年税额（$18,000）均超 $3,000 须分期预缴，虽然收入与资本达标，但 8 月 GST 迟缴打破了前 12 个月完美合规记录（perfect compliance history），失去按季预缴资格，必须按月预缴，且首期到期日为税年首日（11 月 11 日）起「一个月差一天（one month less a day）」，即 2026 年 12 月 10 日。 / Correct. First, a qualifying CCPC (a CCPC throughout the year, claiming the SBD, with prior-year taxable income not over the limit) has a balance-due day of 3 months after year end, that is, February 10, 2027; second, the year end of November 10 is not at month end, so the filing deadline is the same day of the sixth month after year end, May 10, 2027; third, tax for both the prior year and the current year ($18,000) exceeds $3,000, so instalments are required; although income and capital qualify, the late GST payment in August broke the perfect compliance history for the prior 12 months, so quarterly eligibility is lost and monthly instalments are required, with the first due date "one month less a day" from the first day of the tax year (November 11), that is, December 10, 2026.

d. ✗ 错误。首期分期预缴日不是自然月月末，而是从税年开始日起算「一个月差一天（one month less a day）」：11 月 11 日开始的税年，首期预缴日是 12 月 10 日。 / Wrong. The first instalment date is not the end of a calendar month, but "one month less a day" from the start date of the tax year: for a tax year starting November 11, the first instalment date is December 10.

40′ 答案 a

a. ✓ 正确。非 CCPC 不享三个月宽限，欠税截止日（balance-due day）为年结后 2 个月（2026 年 5 月 31 日）；年结落在月末（3 月 31 日），申报截止日为第 6 个月的月末（2026 年 9 月 30 日）；分期预缴规则是「上一年或本年任一年税额不超过 $3,000 即免分期」，由于 2025 年税额仅 $2,400（不超过 $3,000），故 2026 年免于分期预缴。 / Correct. A non-CCPC does not get the three-month grace; its balance-due day is 2 months after year end (May 31, 2026); the year end falls on a month end (March 31), so the filing deadline is the end of month 6 (September 30, 2026); the instalment rule is "no instalments if tax for either the prior year or the current year is not over $3,000", and since 2025 tax was only $2,400 (not over $3,000), 2026 is exempt from instalments.

b. ✗ 错误。该公司不是 CCPC，欠税截止日只有 2 个月（5 月 31 日）而非 3 个月；且只要上一年或本年任一年不超过 $3,000 即可免分期，2025 年为 $2,400，因此 2026 年无需分期预缴。 / Wrong. This company is not a CCPC, so the balance-due day is only 2 months (May 31), not 3 months; and no instalments are needed as long as tax for either the prior year or the current year is not over $3,000, and 2025 was $2,400, so 2026 does not require instalments.

c. ✗ 错误。欠税截止日是 5 月 31 日而非 9 月 30 日，且非 CCPC 绝无按季度分期预缴的资格。 / Wrong. The balance-due day is May 31, not September 30, and a non-CCPC has no eligibility at all for quarterly instalments.

d. ✗ 错误。T2 申报截止日是年结后 6 个月（9 月 30 日）而非年底；且 $3,000 门槛不看两年平均值，而是看上一年或本年任一年是否不超过 $3,000。 / Wrong. The T2 filing deadline is 6 months after year end (September 30), not year end; and the $3,000 threshold is not tested on a two-year average, but on whether tax for either the prior year or the current year is not over $3,000.

41 答案 d

a. ✗ 错误。把迟报罚的计算基数当成了「全年税款总额（$40,000）」；税法规定迟报罚的基数是申报截止日当日的「未缴税款（unpaid tax）」。 / Wrong. This takes the base for the late-filing penalty to be the "total tax for the year ($40,000)"; the law says the base for the late-filing penalty is the "unpaid tax" on the filing deadline.

b. ✗ 错误。17% 是迟报满 12 个月的首犯封顶比例（5% + 1% × 12），而本题只迟报了 4 个整月（5% + 1% × 4 = 9%）；X 公司截止日不欠税，迟报罚为 $0，$1,000 是应电子申报 T2 而未电子申报的罚款，与迟报罚无关。 / Wrong. 17% is the cap for a first-time offender late for a full 12 months (5% + 1% x 12), whereas here the filing was only 4 full months late (5% + 1% x 4 = 9%); Company X owes no tax on the deadline, so its late-filing penalty is $0, and $1,000 is the penalty for failing to file a T2 electronically when required, unrelated to the late-filing penalty.

c. ✗ 错误。Y 公司是首次迟报（first-time late filer），适用 5% 加每月 1%（共 9%），只有收到 CRA 催报要求且前三年内曾被罚过的重犯才适用 10% 加每月 2%（10% + 2% × 4 = 18%）。 / Wrong. Company Y is a first-time late filer, to which 5% plus 1% per month (9% in total) applies; only a repeat offender who received a CRA demand to file and had been penalized in the preceding three years gets 10% plus 2% per month (10% + 2% x 4 = 18%).

d. ✓ 正确。根据 ITA s.162(1)，迟交 T2 的首犯罚款基数是「申报截止日当日的未缴税款（unpaid tax）」，比例为 5% 加每满一个整月 1%（最多 12 个月，封顶 17%）。X 公司在截止日不欠税，故迟报罚为 $0（但迟报仍会推迟评税并留下不良记录）；Y 公司未缴税款为 $30,000，迟报 4 个整月按 5% + 4 × 1% = 9% 计算，罚款为 $30,000 × 9% = $2,700。 / Correct. Under ITA s.162(1), the base of a first-time late T2 penalty is the "unpaid tax" on the filing deadline, at 5% plus 1% for each full month (up to 12 months, capped at 17%). Company X owes no tax on the deadline, so its late-filing penalty is $0 (although late filing still delays assessment and leaves a poor record); Company Y's unpaid tax is $30,000, 4 full months late at 5% + 4 x 1% = 9%, so the penalty is $30,000 x 9% = $2,700.

41′ 答案 b

a. ✗ 错误。5% 加每月 1% 是首犯费率；该公司已收到 CRA 申报要求且前三年内有过迟报受罚记录，触发了重犯翻倍罚则。 / Wrong. 5% plus 1% per month is the first-offence rate; this company received a CRA demand to file and had a late-filing penalty record in the preceding three years, triggering the doubled repeat-offender penalty.

b. ✓ 正确。根据 ITA s.162(2)，当 CRA 已发出申报要求且公司在前三年内曾因迟报被罚过时，迟报罚升级为未缴税款的 10% 加每满一个整月 2%（最多 20 个月，封顶 50%）。迟报 6 个整月即 10% + 2% × 6 = 22%，罚款 = $20,000 × (10% + 2% × 6) = $4,400。 / Correct. Under ITA s.162(2), when the CRA has issued a demand to file and the company was penalized for late filing in the preceding three years, the late-filing penalty escalates to 10% of unpaid tax plus 2% for each full month (up to 20 months, capped at 50%). Late by 6 full months is 10% + 2% x 6 = 22%, so the penalty = $20,000 x (10% + 2% x 6) = $4,400.

c. ✗ 错误。50% 是重犯迟报满 20 个月时的封顶上限（10% + 2% × 20 = 50%），迟报 6 个整月按 22% 计算，不是直接按 50% 一刀切。 / Wrong. 50% is the cap for a repeat offender late a full 20 months (10% + 2% x 20 = 50%); being late 6 full months is computed at 22%, not flatly at 50%.

d. ✗ 错误。17% 只是首犯的封顶比例（5% + 1% × 12），重犯罚则的封顶比例是 50%。 / Wrong. 17% is only the cap for a first offence (5% + 1% x 12); the cap for the repeat-offender penalty is 50%.

42 答案 a

a. ✓ 正确。第一，根据 BC ITA ss.110.1–110.7，全年为 CCPC 且在 BC 有常设机构的公司，在 2026-04-01 至 2031-03-31 期间对合资格新制造加工资产的净支出（每年上限 $2,000,000，关联公司共享）在达到可供使用的税年可申领 15% 的可退还税收抵免，即 $1,000,000 × 15% = $150,000；第二，用了 SBD 的低税利润分出的股息属于非合资格股息（non-eligible dividend），个人层面按 15% 股息毛额化（dividend gross-up，ITA s.82(1)(b)），并按放大部分的 9/13 申领联邦股息税收抵免（ITA s.121），体现公司与个人两级课税的整合（integration）机制。 / Correct. First, under BC ITA ss.110.1–110.7, a company that is a CCPC throughout the year and has a permanent establishment in BC may claim a 15% refundable tax credit on net expenditures on qualifying new manufacturing and processing property between 2026-04-01 and 2031-03-31 (annual cap $2,000,000, shared by associated companies) in the tax year in which it becomes available for use, that is, $1,000,000 x 15% = $150,000; second, a dividend paid out of low-taxed profit that used the SBD is a non-eligible dividend, which at the personal level is grossed up by 15% (dividend gross-up, ITA s.82(1)(b)) and earns the federal dividend tax credit at 9/13 of the grossed-up amount (ITA s.121), reflecting the integration mechanism between the two levels of tax on company and individual.

b. ✗ 错误。$150,000 是直接抵税（且可退还）的投资税收抵免金额，不是 Schedule 1 上的额外费用扣除；且放大 38%、抵免 6/11 是按一般税率课税利润分出的合资格股息（eligible dividend）规则，不是用了 SBD 的非合资格股息规则。 / Wrong. $150,000 is the amount of an investment tax credit applied directly against tax (and refundable), not an extra expense deduction on Schedule 1; and the gross-up of 38% and credit of 6/11 are the rules for an eligible dividend paid out of profit taxed at the general rate, not the non-eligible dividend rules for profit that used the SBD.

c. ✗ 错误。BC 制造加工投资税收抵免要求公司全年为 CCPC 且只能在资产达到可供使用（available for use）的税年申领；同时小企业扣除（SBD）只是把税递延到分红那一天，股东收到股息绝非免税，必须先放大 15% 计入个人收入再扣抵免。 / Wrong. The BC manufacturing and processing investment tax credit requires the company to be a CCPC throughout the year and can be claimed only in the tax year the property becomes available for use; and the small business deduction (SBD) merely defers tax to the day of the dividend, and a dividend received by the shareholder is by no means tax-free, but must first be grossed up by 15% into personal income before the credit is deducted.

d. ✗ 错误。BC 制造加工投资税收抵免的年度合资格支出上限是 $2,000,000（关联公司共享）而非 $500,000；非合资格股息的毛额化比例是 15% 而非 19%。 / Wrong. The annual qualifying expenditure cap for the BC manufacturing and processing investment tax credit is $2,000,000 (shared by associated companies), not $500,000; and the gross-up for a non-eligible dividend is 15%, not 19%.

42′ 答案 c

a. ✗ 错误。SBD 是非退还的税额扣减，只要利润留在公司内部不分配，并没有「满十年向政府现金退还 SBD」的规定。 / Wrong. The SBD is a non-refundable reduction of tax, and as long as profit stays in the company undistributed, there is no rule that "after ten years the SBD is refunded to the government in cash".

b. ✗ 错误。SBD 是非退还（non-refundable）税额扣减，只能把应缴税减到零，减不出退税，也不会在次年 Schedule 1 加回公司应税收入。 / Wrong. The SBD is a non-refundable tax reduction that can only reduce tax payable to zero and cannot produce a refund, and it is not added back to the company's taxable income on Schedule 1 the next year.

c. ✓ 正确。在整合（integration）机制下，用了 SBD 享 11% 低税率的利润分红时属于非合资格股息（放大 15%、联邦抵免为放大部分的 9/13），而按 27% 一般税率交过税的利润分红时属于合资格股息（放大 38%、联邦抵免为放大部分的 6/11）。公司在前面少交的税，股东在分红那一天要多补回来，两级合计约等于个人直接赚取该笔收入的税负，所以 SBD 真正给的是把个人层面补税推迟到分红日的递延优势。 / Correct. Under the integration mechanism, a dividend paid from profit that used the SBD and enjoyed the 11% low rate is a non-eligible dividend (grossed up 15%, federal credit 9/13 of the grossed-up amount), while a dividend paid from profit that already bore tax at the 27% general rate is an eligible dividend (grossed up 38%, federal credit 6/11 of the grossed-up amount). The tax the company paid less up front must be made up by the shareholder on the day of the dividend, and the two levels together roughly equal the tax on the individual earning the income directly, so what the SBD really gives is the deferral advantage of pushing the personal-level top-up to the dividend date.

d. ✗ 错误。由于联邦抵免率全国统一而各省税率不同，整合永远只是「约等于（近似）」，不同省份、不同年份走「留存分红」与「发工资」会相差几个百分点，任何声称开公司一定省税或一定与发工资分毫不差的说法都是错误的。 / Wrong. Because the federal credit rate is uniform nationwide while provincial rates differ, integration is always only "approximate"; between provinces and years, going the "retain then dividend" route versus paying salary can differ by several percentage points, and any claim that incorporating always saves tax or matches salary to the penny is wrong.

第 7 章答案与解析

43 答案 a

a. ✓ 正确。合计投资收入（aggregate investment income, AII）包含应税资本利得净额（$50,000）加利息（$30,000），剔除按 s.112 扣除的股息，合计 $80,000；调整后合计投资收入（adjusted aggregate investment income, AAII）在 AII 基础上剔除处置经营性资产（active asset）的应税资本利得（−$50,000），并加回非联结公司（non-connected corporation）股息（+$25,000），得出 $30,000 + $25,000 = $55,000。 / Correct. Aggregate investment income (AII) includes net taxable capital gains ($50,000) plus interest ($30,000) and excludes dividends deducted under s.112, for a total of $80,000. Adjusted aggregate investment income (AAII) starts from AII, removes the taxable capital gain on disposing of an active asset (-$50,000) and adds back dividends from a non-connected corporation (+$25,000), giving $30,000 + $25,000 = $55,000.

b. ✗ 错误。掉入了『AII与AAII口径混用』陷阱，将 Schedule 7 第 1 部分的 AII（$80,000）与第 2 部分的 AAII（$55,000）两个数值完全颠倒。 / Wrong. This falls into the 'Mixing up the AII and AAII bases' trap and swaps the two numbers: AII in Schedule 7 Part 1 ($80,000) and AAII in Part 2 ($55,000).

c. ✗ 错误。计算 AAII 时只记住了加回非联结公司的组合股息（$25,000），却忘了剔除处置自用经营性资产（active asset）产生的 $50,000 应税资本利得（ITA s.125(7)）。 / Wrong. In computing AAII it only adds back the $25,000 of portfolio dividends from a non-connected corporation and forgets to remove the $50,000 taxable capital gain on disposing of an owner-used active asset (ITA s.125(7)).

d. ✗ 错误。计算 AII 时误把按 s.112 扣除的 $25,000 上市公司股息也加了进去；该股息归 Part IV 税管辖，不计入 Part I 的 AII（ITA s.129(4)）。 / Wrong. In computing AII it wrongly adds the $25,000 of listed-company dividends deducted under s.112. Those dividends fall under Part IV tax and are not part of Part I AII (ITA s.129(4)).

43′ 答案 c

a. ✗ 错误。掉入了『AII与AAII口径混用』陷阱，把两个口径的计算规则反过来套用，导致结果颠倒。 / Wrong. This falls into the 'Mixing up the AII and AAII bases' trap: it applies the two bases the wrong way round, so the results are swapped.

b. ✗ 错误。计算 AAII 时加回了 $15,000 非联结公司股息，但漏了剔除出售货运卡车（经营性资产 active asset）的 $40,000 应税资本利得。 / Wrong. In computing AAII it adds back the $15,000 of non-connected dividends but fails to remove the $40,000 taxable capital gain on selling the freight trucks (active assets).

c. ✓ 正确。合计投资收入（AII）= 净租金 $40,000 + 应税资本利得 $40,000 = $80,000（不含按 s.112 扣除的股息）；调整后合计投资收入（AAII）剔除处置经营性资产（active asset）的 $40,000 应税资本利得，并加回非联结公司（non-connected）股息 $15,000，即 $40,000 + $15,000 = $55,000。 / Correct. Aggregate investment income (AII) = net rent $40,000 + taxable capital gain $40,000 = $80,000 (dividends deducted under s.112 are excluded). Adjusted aggregate investment income (AAII) removes the $40,000 taxable capital gain on disposing of an active asset and adds back the $15,000 of non-connected dividends: $40,000 + $15,000 = $55,000.

d. ✗ 错误。AII 必须包含所有应税资本利得（无论是否属于经营性资产），而 AAII 必须加回非联结公司的组合股息 $15,000。 / Wrong. AII must include all taxable capital gains (whether or not the asset was an active asset), and AAII must add back the $15,000 of portfolio dividends from non-connected corporations.

44 答案 b

a. ✗ 错误。掉入了『被动收入递减错算当年或全额乘5』陷阱中的跨年时点误区：2026 税年的经营限额递减看的是上一历年内结束的税年（即 2025 年的 $80,000），而不是 2026 年当年的 $20,000（ITA s.125(5.1)(b)）。 / Wrong. This falls into the cross-year timing error within the trap 'Applying the passive income grind to the wrong year, or multiplying the full AAII by 5': the 2026 business limit reduction looks at the tax years ending in the preceding calendar year (the $80,000 for 2025), not the $20,000 for 2026 itself (ITA s.125(5.1)(b)).

b. ✓ 正确。被动收入限额递减（business limit reduction）按上一历年内结束税年（2025 年）的 AAII 计算：($80,000 − $50,000) × 5 = $150,000。卑诗省低税限额同步削减 $150,000，导致这 $150,000 的经营利润从 11%（联邦 9% + 卑诗 2%）跳升至 27%（联邦 15% + 卑诗 12%），每 $1 多交 16%，合计多交 $150,000 × 16% = $24,000。 / Correct. The passive income business limit reduction is based on the AAII of tax years ending in the preceding calendar year (2025): ($80,000 – $50,000) x 5 = $150,000. The BC low-rate limit is cut by the same $150,000, so that $150,000 of operating profit moves from 11% (federal 9% + BC 2%) to 27% (federal 15% + BC 12%), 16% more on each dollar, for $150,000 x 16% = $24,000 of additional tax.

c. ✗ 错误。掉入了『全额乘5』陷阱：直接把 2025 年的 $80,000 乘以 5 得出 $400,000，忘了先扣除 $50,000 的免削门槛。 / Wrong. This falls into the 'multiply by 5' trap: it multiplies the whole 2025 $80,000 by 5 to get $400,000, forgetting to deduct the $50,000 free threshold first.

d. ✗ 错误。卑诗省的小企业低税率直接挂钩联邦小企业扣除，联邦削减 $150,000 限额时，卑诗省同步削减 $150,000（多交省税 10% 即 $15,000，加联邦 6% 即 $9,000，合计 $24,000）。 / Wrong. BC's small business rate is tied directly to the federal small business deduction, so when the federal limit is cut by $150,000, BC cuts it by the same $150,000 (10% more BC tax is $15,000; adding 6% federal is $9,000, for $24,000 in total).

44′ 答案 a

a. ✓ 正确。2025 年 AAII 超出 $50,000 的部分为 $60,000（$110,000 − $50,000），2026 年经营限额削减额（business limit reduction）为 $60,000 × 5 = $300,000，剩余限额为 $500,000 − $300,000 = $200,000。被削掉的 $300,000 经营利润税率从 11% 升至 27%（差额 16%），多交合计公司税 $300,000 × 16% = $48,000。 / Correct. The 2025 AAII exceeds $50,000 by $60,000 ($110,000 – $50,000), so the 2026 business limit reduction is $60,000 x 5 = $300,000, leaving a limit of $500,000 – $300,000 = $200,000. The $300,000 of profit that loses the low rate goes from 11% to 27% (a 16% difference), for $300,000 x 16% = $48,000 of additional combined corporate tax.

b. ✗ 错误。递减看的是上一历年内结束税年（2025 年）的 AAII，即使 2026 年被动收入回到零，2025 年的一次性利得仍会在 2026 年削掉 $300,000 限额。 / Wrong. The grind looks at the AAII of the tax years ending in the preceding calendar year (2025). Even if passive income returns to zero in 2026, the one–off 2025 gain still removes $300,000 of limit in 2026.

c. ✗ 错误。错把 $110,000 全额乘以 5；只有超过 $50,000 的部分才乘以 5，AAII 要到 $150,000 时经营限额才会归零。 / Wrong. It wrongly multiplies the full $110,000 by 5. Only the amount over $50,000 is multiplied by 5, and the business limit does not reach zero until AAII reaches $150,000.

d. ✗ 错误。漏算了卑诗省同步削减限额带来的 10% 省税差额（12% 一般率减 2% 小企业率）。 / Wrong. It omits the 10% BC tax difference caused by BC cutting the limit in step (12% general rate less the 2% small business rate).

45 答案 c

a. ✗ 错误。掉入了『联结与联营判据张冠李戴』陷阱：Part IV 税看的是是否属于联结公司（connected corporation，ITA s.186(4)），而不是小企业扣除用的联营（associated）。 / Wrong. This falls into the trap 'Using the associated test where the connected test applies': Part IV tax asks whether the corporations are connected (ITA s.186(4)), not whether they are associated, which is the test for the small business deduction.

b. ✗ 错误。联结公司股息的按比例传导，乘的是付款方（Valley Supply）因派发该股息实际拿到的股息退税（dividend refund），而不是把 38⅓% 再乘以 15% 持股比例。 / Wrong. For a connected corporation, the proportional flow–through multiplies by the dividend refund the payer (Valley Supply) actually received for paying that dividend, not by 15% of the 38⅓% rate.

c. ✓ 正确。根据 ITA s.186(4)，收款方持有付款方超过 10% 表决权股本（>10% voting shares）且占全部股份市值超过 10%（>10% fair market value），即构成联结公司（connected corporation），无需控制或联营。来自联结公司的股息仅在付款方因派发该股息获得股息退税时才按比例课 Part IV 税（s.186(1)(b)）；既然 Valley Supply 股息退税为 $0，Summit Holdings 的 Part IV 税即为 $0。 / Correct. Under ITA s.186(4), a recipient that holds more than 10% of the payer's voting shares and more than 10% of the fair market value of all its shares is connected, with no control or association needed. A dividend from a connected corporation attracts Part IV tax only in proportion to the dividend refund the payer receives for paying it (s.186(1)(b)); since Valley Supply's dividend refund is $0, Summit Holdings' Part IV tax is $0.

d. ✗ 错误。加拿大公司间应税股息按 s.112 在计算应税收入时全额扣除，不交 Part I 税（也不适用 30⅔%），只受 Part IV 税规则管辖。 / Wrong. Taxable dividends between Canadian corporations are fully deducted under s.112 in computing taxable income, so there is no Part I tax (and the 30⅔% rate does not apply); they are governed by the Part IV tax rules only.

45′ 答案 b

a. ✗ 错误。掉入了『联结与联营判据张冠李戴』陷阱：亲属关系用于判断联营（associated），而联结（connected）的第二条路径要求同时满足『>10% 表决权』且『>10% 总市值』两个条件（ITA s.186(4)）。 / Wrong. This falls into the trap 'Using the associated test where the connected test applies': family relationship is used to decide whether corporations are associated, while the second path to being connected requires both more than 10% of the voting shares and more than 10% of the total market value (ITA s.186(4)).

b. ✓ 正确。不具控制权（>50% 表决权）时，构成联结公司（connected corporation）必须同时满足持有 >10% 表决权股本且占全部股份 >10% 市值（ITA s.186(4)）。Harbour 只占总市值 8%，不是联结公司，付款方有没有股息退税都不影响，按 38⅓% 全额课 Part IV 税：$100,000 × 38⅓% ＝ $38,333。 / Correct. Without control (>50% of votes), a corporation is connected only if it holds >10% of the voting shares and >10% of the market value of all shares (ITA s.186(4)). Harbour holds only 8% of total value, so it is not connected, and whether the payer gets a dividend refund does not matter: full Part IV tax at 38⅓% applies, $100,000 x 38⅓% = $38,333.

c. ✗ 错误。30⅔% 是 Part I 税对利息、租金等 AII 的可退还比例，而公司间股息适用的是 38⅓% 的 Part IV 税率。 / Wrong. 30⅔% is the refundable portion of Part I tax on interest, rent and other AII; inter-corporate dividends are subject to Part IV tax at 38⅓%.

d. ✗ 错误。来自非联结公司的应税股息无论是合资格股息（eligible dividend）还是非合资格股息，均须按 38⅓% 缴纳 Part IV 税（区别仅在于进 ERDTOH 还是 NERDTOH）。 / Wrong. Taxable dividends from a non-connected corporation bear Part IV tax at 38⅓% whether they are eligible or non-eligible dividends (the only difference is whether the amount goes to ERDTOH or NERDTOH).

46 答案 c

a. ✗ 错误。掉入了『双池RDTOH退税方向搞反』陷阱：派发合资格股息（eligible dividend）只能掏 ERDTOH（上限 $15,000），绝对不能动用 NERDTOH（ITA s.129(1)）。 / Wrong. This falls into the trap 'Getting the direction of the dual-pool RDTOH refund backwards': paying an eligible dividend can draw ERDTOH only (up to $15,000) and can never use NERDTOH (ITA s.129(1)).

b. ✗ 错误。派发非合资格股息（non-eligible dividend）的法定顺序是必须先掏 NERDTOH，把 NERDTOH 掏干之后才能动用 ERDTOH，顺序不能颠倒。 / Wrong. The statutory order for paying a non-eligible dividend is to draw NERDTOH first and use ERDTOH only after NERDTOH is exhausted; the order cannot be reversed.

c. ✓ 正确。根据 ITA s.129(1)(a)，派非合资格股息（non-eligible dividend）的退税额度是已付股息的 38⅓%：$100,000 × 38⅓% ＝ $38,333。先掏空非合资格池（NERDTOH）$23,000，余下额度再从合资格池（ERDTOH）取，但 ERDTOH 只有 $15,000，所以合计退税 ＝ $23,000 ＋ $15,000 ＝ $38,000，受两个池余额封顶，拿不到 $38,333。 / Correct. Under ITA s.129(1)(a), the refund for a non-eligible dividend is 38⅓% of the dividend paid: $100,000 x 38⅓% = $38,333. NERDTOH ($23,000) is drawn down first, and the rest comes from ERDTOH, but ERDTOH has only $15,000, so the total refund is $23,000 + $15,000 = $38,000, capped by the pool balances, not the $38,333.

d. ✗ 错误。单向限制的是合资格股息（只能掏 ERDTOH）；非合资格股息把 NERDTOH 掏干之后，可以继续掏 ERDTOH。 / Wrong. The one-way restriction applies to eligible dividends (they can draw ERDTOH only); once NERDTOH is exhausted, a non-eligible dividend may continue to draw ERDTOH.

46′ 答案 a

a. ✓ 正确。根据双池 RDTOH 规则（ITA s.129(1)），派发合资格股息（eligible dividend）只能从合资格池（ERDTOH）申请退税，不能动用非合资格池（NERDTOH）。由于 ERDTOH 余额为 $0，即便公司有充足的 GRIP 和 $30,667 的 NERDTOH，本次派息的股息退税也是 $0。 / Correct. Under the dual-pool RDTOH rules (ITA s.129(1)), an eligible dividend can obtain a refund only from the eligible pool (ERDTOH) and cannot use the non-eligible pool (NERDTOH). Because ERDTOH is $0, even with enough GRIP and $30,667 of NERDTOH the dividend refund on this payment is $0.

b. ✗ 错误。GRIP 只能保证公司派发合资格股息不触发 20% 的 Part III.1 超额指定罚税，但不能让合资格股息去掏 NERDTOH 的钱。 / Wrong. GRIP only keeps the corporation from the 20% Part III.1 tax on an excessive eligible dividend designation; it does not let an eligible dividend draw NERDTOH.

c. ✗ 错误。股息退税率是 38⅓% 而非 30⅔%，且合资格股息无法动用 NERDTOH，退税额应为 $0。 / Wrong. The dividend refund rate is 38⅓%, not 30⅔%, and an eligible dividend cannot use NERDTOH, so the refund is $0.

d. ✗ 错误。税法中没有『GRIP 清零即可退一半 NERDTOH』的规定；要拿回 NERDTOH，必须派发非合资格股息（non-eligible dividend）。 / Wrong. The Act has no rule that 'reducing GRIP to zero lets half of NERDTOH be refunded'; to recover NERDTOH, the corporation must pay a non-eligible dividend.

47 答案 d

a. ✗ 错误。掉入了『资本股息超额与迟报后果混淆』陷阱：每年 $500 封顶是迟报 T2054 选择的罚款（s.83(4)），而派超 CDA 余额触发的是 60% 的 Part III 税，且不会自动转为应税股息（转应税股息必须满足 90 天期限与股东一致同意并主动做 s.184(3) 选择）。 / Wrong. This falls into the trap 'Confusing the capital dividend excess with the consequences of late filing': the $500 annual cap is the penalty for filing the T2054 election late (s.83(4)), whereas paying more than the CDA balance triggers 60% Part III tax, and the excess is not automatically converted into a taxable dividend (that requires the 90-day deadline, unanimous shareholder consent and an active s.184(3) election).

b. ✗ 错误。20% 的 Part III.1 税适用于合资格股息超额指定（excessive eligible dividend designation，超 GRIP），而派超 CDA 适用的是 60%（3/5）的 Part III 税。 / Wrong. The 20% Part III.1 tax applies to an excessive eligible dividend designation (more than GRIP), whereas paying more than the CDA triggers 60% (3/5) Part III tax.

c. ✗ 错误。在 CDA 余额（$100,000）范围内的部分依然是有效的免税资本股息，只有超额的 $50,000 触发 60% 的 Part III 税。 / Wrong. The part within the CDA balance ($100,000) is still a valid tax-free capital dividend; only the $50,000 excess triggers the 60% Part III tax.

d. ✓ 正确。根据 ITA s.184(2)，资本股息派超资本股息账户（capital dividend account, CDA）余额时，公司须按超额部分的 3/5（60%）缴纳 Part III 税（$50,000 × 60% ＝ $30,000），利息自选择之日起算（s.185(2)）；收款股东按所收股息占股息全额的比例（各 50%）与公司负连带责任（jointly and severally liable），每人上限为 $30,000 × 50% ＝ $15,000（s.185(4)）。 / Correct. Under ITA s.184(2), when a capital dividend exceeds the capital dividend account (CDA) balance, the corporation pays Part III tax of 3/5 (60%) of the excess ($50,000 x 60% = $30,000), with interest running from the election date (s.185(2)); recipient shareholders are jointly and severally liable with the corporation in proportion to the dividends received (50% each), up to $30,000 x 50% = $15,000 each (s.185(4)).

47′ 答案 b

a. ✗ 错误。掉入了『年末才算 CDA 余额』的陷阱：年末计算的是 GRIP，而 CDA 余额是累计到『股息成为应付或实际支付那一刻』计算的。 / Wrong. This falls into the trap of measuring the CDA balance at year-end: it is GRIP that is computed at year-end, whereas the CDA balance accumulates up to the moment the dividend becomes payable or is paid.

b. ✓ 正确。资本股息账户（capital dividend account, CDA）是从公司最后一次成为私人公司起累计到『派息那一刻』的通知账户，而非年末结算账户。既然 2026 年 3 月 20 日派息前一刻 CDA 确有 $80,000 余额，该次资本股息选择完全有效；同年 10 月后来才发生的资本亏损只会冲减以后的 CDA 可派余额，不会追溯导致 3 月的派息超额。 / Correct. The capital dividend account (CDA) is a notional account accumulated from the time the corporation last became a private corporation up to the moment the dividend is paid, not a year-end account. Since the CDA did have an $80,000 balance immediately before the March 20, 2026 payment, that capital dividend election is fully valid; a capital loss arising later, in October of the same year, reduces the CDA available for later dividends and does not retroactively make the March payment an excess.

c. ✗ 错误。因为 3 月派息时并未超额，根本不产生 Part III 税，无需走 s.184(3) 的补救选择。 / Wrong. Because the March payment was not an excess, there is no Part III tax and no need for the s.184(3) remedial election.

d. ✗ 错误。资本亏损不可扣的一半只冲减由资本利得形成的那部分 CDA（减至零为止），不冲减寿险赔款形成的额度，且不会触发 20% 罚款。 / Wrong. The non-allowable half of a capital loss reduces only the CDA component built from capital gains (down to zero), not the component from life insurance proceeds, and it does not trigger a 20% penalty.

48 答案 a

a. ✓ 正确。CCPC 的一般税率收入池（general rate income pool, GRIP，Schedule 53）在税年末按 0.72 的一般税率因子（general rate factor，ITA s.89(1)）计算；公司可在年中先派合资格股息（须在付款时或之前书面通知股东），但若年末回看时已派总额超过年末 GRIP，超额部分须缴 20% 的 Part III.1 税，若属人为拉高 GRIP 则罚 30%（ITA s.185.1(1)）。 / Correct. A CCPC's general rate income pool (GRIP, Schedule 53) is computed at the end of the tax year using the 0.72 general rate factor (ITA s.89(1)). A corporation may pay eligible dividends earlier in the year (with written notice to shareholders at or before payment), but if at the year-end look-back the total paid exceeds year-end GRIP, the excess bears 20% Part III.1 tax, or 30% if GRIP was artificially inflated (ITA s.185.1(1)).

b. ✗ 错误。低税率收入池（low rate income pool, LRIP，Schedule 54）是非 CCPC 才有的阻挡池；CCPC 只有 GRIP，没有 LRIP。 / Wrong. The low rate income pool (LRIP, Schedule 54) is a blocking pool for non-CCPCs only; a CCPC has GRIP and no LRIP.

c. ✗ 错误。要求在每次派息前一刻核实余额、超额罚 60% Part III 税的是资本股息账户（CDA），而 GRIP 是在年末计算的，超额罚 20% 或 30%（Part III.1 税）。 / Wrong. The account that must be checked immediately before each payment, with 60% Part III tax on the excess, is the capital dividend account (CDA); GRIP is computed at year-end and the excess is taxed at 20% or 30% (Part III.1 tax).

d. ✗ 错误。根据 ITA s.89(14)，合资格股息必须在付款当时或之前书面通知股东（董事会纪要记一行即可）；迟报指定可在三年内补作，但也要通知股东，不存在「永不通知、只在 T2 上报」就成立的合资格股息。 / Wrong. Under ITA s.89(14), an eligible dividend must be notified to shareholders in writing at or before payment (one line in the board minutes will do); a late designation can be made within three years but must still be notified to shareholders; there is no eligible dividend that is valid by 'never notifying and merely reporting it on the T2'.

48′ 答案 b

a. ✗ 错误。GRIP 在年末才结算，年中可以先派合资格股息，只要年末有足够的 GRIP 即可覆盖；因此 $40,000 部分有效，只有超出的 $60,000 属于超额指定。 / Wrong. GRIP is settled at year-end. Eligible dividends may be paid earlier in the year as long as year-end GRIP covers them, so $40,000 is valid and only the $60,000 above it is an excessive designation.

b. ✓ 正确。年末回看时已派合资格股息（$100,000）超出年末 GRIP（$40,000）的 $60,000 构成超额合资格股息指定（excessive eligible dividend designation，Schedule 55），适用 20% 的 Part III.1 税（$12,000）；因为不涉及人为拉高 GRIP（30% 档），该 20% 罚税可经股东同意将超额部分改按普通（非合资格）股息处理来化解（ITA s.185.1）。 / Correct. At the year-end look-back, the eligible dividends paid ($100,000) exceed year-end GRIP ($40,000) by $60,000, which is an excessive eligible dividend designation (Schedule 55) bearing 20% Part III.1 tax ($12,000). Because no artificial inflation of GRIP is involved (the 30% tier), the 20% tax can be avoided if the shareholder consents to treat the excess as an ordinary (non-eligible) dividend (ITA s.185.1).

c. ✗ 错误。年中先派、等年末算 GRIP 是税法允许的正常时点机制，不属于人为拉高 GRIP 的安排，不适用不可豁免的 30% 惩罚档。 / Wrong. Paying early and settling GRIP at year-end is a normal timing mechanism the Act allows. It is not an arrangement to inflate GRIP artificially, so the non-waivable 30% tier does not apply.

d. ✗ 错误。60% 的 Part III 税和 T2054 表格针对的是资本股息账户（CDA），与 GRIP 和合资格股息无关。 / Wrong. The 60% Part III tax and Form T2054 relate to the capital dividend account (CDA), not to GRIP or eligible dividends.

49 答案 d

a. ✗ 错误。两条递减是取大者（exceeds the greater of，ITA s.125(5.1)），不相加。应税资本递减 = $500,000 × ($12,000,000 − $10,000,000) ÷ ($50,000,000 − $10,000,000) = $25,000；被动收入递减 = ($70,000 − $50,000) × 5 = $100,000；$25,000 + $100,000 = $125,000 是相加的错算。 / Wrong. The two grinds are not added; the reduction is the greater of the two (ITA s.125(5.1)). Taxable capital grind = $500,000 x ($12,000,000 – $10,000,000) / ($50,000,000 – $10,000,000) = $25,000; passive income grind = ($70,000 – $50,000) x 5 = $100,000; $25,000 + $100,000 = $125,000 is the mistaken sum.

b. ✗ 错误。两条递减取大者而非取小者；$25,000 是 2026 现行 $10M–$50M 区间下的应税资本递减（$500,000 × $2,000,000 ÷ $40,000,000），不是最终削减额。 / Wrong. The two grinds are taken at the greater, not the smaller; $25,000 is the taxable capital grind under the current 2026 $10M–$50M range ($500,000 x $2,000,000 / $40,000,000), not the final reduction.

c. ✗ 错误。$10M–$15M 是 2022-04-07 之前的旧区间（旧培训材料仍写这个）：按它算 $500,000 × $2,000,000 ÷ $5,000,000 = $200,000。2026 现行区间是 $10M–$50M，应税资本递减只有 $25,000。 / Wrong. $10M–$15M is the old range from before 2022-04-07 (the old training material still says so): on it, $500,000 x $2,000,000 / $5,000,000 = $200,000. The current 2026 range is $10M–$50M, and the taxable capital grind is only $25,000.

d. ✓ 正确。被动收入递减 = ($70,000 − $50,000) × 5 = $100,000；2026 现行应税资本递减区间为 $10M–$50M，$500,000 × ($12,000,000 − $10,000,000) ÷ $40,000,000 = $25,000；两条递减取大者（ITA s.125(5.1)），削减 $100,000，剩余经营限额 $400,000。 / Correct. Passive income grind = ($70,000 – $50,000) x 5 = $100,000; under the current 2026 range of $10M–$50M, the taxable capital grind is $500,000 x ($12,000,000 – $10,000,000) / $40,000,000 = $25,000; the reduction is the greater of the two (ITA s.125(5.1)), so $100,000, leaving a business limit of $400,000.

49′ 答案 c

a. ✗ 错误。掉入了计量期混淆陷阱：只看『上一个税年（preceding tax year)』的是应税资本递减（s.125(5.1)(a)），而被动收入递减（s.125(5.1)(b)）看的是『在上一历年内结束的每一个税年』的 AAII 合计。 / Wrong. This falls into confusing the measurement periods: only the taxable capital grind looks at the 'preceding taxation year' (s.125(5.1)(a)), whereas the passive income grind (s.125(5.1)(b)) totals the AAII of each tax year ending in the preceding calendar year.

b. ✗ 错误。$50,000 门槛是针对上一历年内结束的所有税年的 AAII 加总数（$35,000 + $45,000 = $80,000），不是每个短税年各自享有一个 $50,000。 / Wrong. The $50,000 threshold applies to the total AAII of all tax years ending in the preceding calendar year ($35,000 + $45,000 = $80,000); each short tax year does not get its own $50,000.

c. ✓ 正确。根据 ITA s.125(5.1)(b)，被动收入递减公式中的 E 计量的是公司在『上一历年内结束的每一个税年（all taxation years ending in the preceding calendar year)』的 AAII 总和。因此 2025 历年内结束的两个税年的 AAII 必须相加（$35,000 + $45,000 = $80,000)，削减 2026 年经营限额 ($80,000 − $50,000) × 5 = $150,000。 / Correct. Under ITA s.125(5.1)(b), the E element of the passive income grind measures the total AAII of all taxation years ending in the preceding calendar year. So the AAII of both tax years ending in calendar 2025 must be added ($35,000 + $45,000 = $80,000), cutting the 2026 business limit by ($80,000 – $50,000) x 5 = $150,000.

d. ✗ 错误。即便把两个税年的 AAII 加总为 $80,000，乘以 5 的也只是超出 $50,000 的 $30,000 部分（削 $150,000)，且应税资本递减只取上一税年（不把两个税年的应税资本相加)。 / Wrong. Even adding the two years' AAII to $80,000, only the $30,000 over $50,000 is multiplied by 5 (a $150,000 cut), and the taxable capital grind uses only the preceding tax year (the taxable capital of two tax years is not added).

第 8 章答案与解析

50 答案 b

a. ✗ 落入股息计入赚取收入陷阱。根据《所得税法》(ITA) s.146(1)，注册退休储蓄计划（RRSP）的赚取收入（earned income）只包含雇佣所得、自营所得及不动产净租金等，股息不在清单内，因此不会产生 $18,000 的 RRSP 额度。 / Falls into the 'Treating dividends as earned income' trap. Under ITA s.146(1), earned income for the registered retirement savings plan (RRSP) includes only employment income, self-employment income and net rental income from real property, among others; dividends are not on the list, so no $18,000 of RRSP room is generated.

b. ✓ 正确。股息既不产生加拿大退休金计划（Canada Pension Plan, CPP）可保收入，也被排除在 ITA s.146(1) 的 RRSP 赚取收入（earned income）和 ITA s.63(3) 的托儿费扣除赚取收入之外，只靠分红维生会让这三项资格全部归零。 / Correct. Dividends neither create Canada Pension Plan (CPP) pensionable earnings nor count as earned income for RRSP room under ITA s.146(1) or for the child care deduction under ITA s.63(3); living on dividends alone reduces all three qualifications to zero.

c. ✗ 落入股息计入赚取收入陷阱。托儿费扣除额度虽按赚取收入（earned income）的三分之二封顶（ITA s.63(3)），但该定义只认雇佣与自营所得，不含股息或毛额化股息。 / Falls into the 'Treating dividends as earned income' trap. The child care deduction is indeed capped at two-thirds of earned income (ITA s.63(3)), but that definition recognizes only employment and self-employment income and does not include dividends or grossed-up dividends.

d. ✗ 混淆了工资与分红在公司层面的扣除规则。工资可以作为经营支出在算税前扣除，而分红是用公司交完税后的留存利润分配的，在公司层面不可扣除。 / Confuses the deduction rules for salary and dividends at the corporate level. Salary can be deducted before tax as an operating expense, while a dividend is paid out of after-tax retained profit and is not deductible at the corporate level.

50′ 答案 d

a. ✗ 落入股息计入赚取收入陷阱。非合资格股息（non-eligible dividend）不属于赚取收入（earned income），发 $70,000 分红产生的 RRSP 额度和托儿费扣除基数均为 $0。 / Falls into the 'Treating dividends as earned income' trap. A non-eligible dividend is not earned income, so paying a $70,000 dividend generates $0 of RRSP room and a $0 child care deduction base.

b. ✗ 落入股息计入赚取收入陷阱。无论股息是否经过 15% 毛额化（dividend gross-up），股息都不计入 ITA s.146(1) 或 s.63(3) 的赚取收入。 / Falls into the 'Treating dividends as earned income' trap. Whether or not the dividend is grossed up by 15%, dividends are never included in earned income under ITA s.146(1) or s.63(3).

c. ✗ 混淆了公司留存利润与个人 RRSP 额度生成机制。个人 RRSP 额度必须凭个人上一年 18% 的赚取收入（earned income）产生，不能用公司留存利润直接生成。 / Confuses retained corporate profit with how personal RRSP room is generated. Personal RRSP room must come from 18% of the individual's prior-year earned income; it cannot be created directly from profit retained in the corporation.

d. ✓ 正确。发放 $70,000 工资属于雇佣所得（赚取收入［earned income］），既可在下一年产生 18% × $70,000 = $12,600 的 RRSP 供款额度，也能提供托儿费扣除所需的赚取收入基数及 CPP 记录。 / Correct. Paying $70,000 of salary is employment income (earned income), which generates RRSP room of 18% x $70,000 = $12,600 for the following year, and also provides the earned income base needed for the child care deduction and a CPP record.

51 答案 c

a. ✗ 错用了合资格股息的参数。38% 毛额化、联邦 6/11 抵免和 BC 省 12% 抵免适用于一般税率利润派发的合资格股息（eligible dividend），而非享小企业扣除后的非合资格股息。 / Uses the parameters of an eligible dividend. The 38% gross-up, the federal 6/11 credit and the BC 12% credit apply to eligible dividends paid out of general rate profit, not to a non-eligible dividend from profit that claimed the small business deduction.

b. ✗ 混淆了省级股息税收抵免的计算基数。卑诗省 2026 年非合资格股息的 1.96% 抵免率乘的是放大后的应税股息（$102.35），而不是实际收到的现金股息（$89.00）。 / Confuses the base for the provincial dividend tax credit. For 2026, BC's 1.96% credit on a non-eligible dividend is applied to the grossed-up taxable dividend ($102.35), not to the actual cash dividend received ($89.00).

c. ✓ 正确。享小企业低税率的利润分出的是非合资格股息（non-eligible dividend），按 ITA s.82(1)(b) 放大 15% 得应税股息 $102.35；联邦股息税收抵免（DTC）为毛额化增量的 9/13（ITA s.121），BC 省抵免为应税股息 $102.35 的 1.96%。 / Correct. Profit taxed at the small business rate is paid out as a non-eligible dividend, grossed up by 15% under ITA s.82(1)(b) to a taxable dividend of $102.35; the federal dividend tax credit (DTC) is 9/13 of the gross-up (ITA s.121), and the BC credit is 1.96% of the $102.35 taxable dividend.

d. ✗ 误解了整合（integration）机制。个人必须先按毛额化放大再抵免，且扣掉抵免后个人层面仍需按边际税率补交第二道税，整合只是近似而非免除个人税。 / Misunderstands integration. The individual must first gross up and then claim the credit, and after the credit there is still a second layer of personal tax at the marginal rate; integration is only approximate and does not remove the personal tax.

51′ 答案 a

a. ✓ 正确。从 GRIP 中派发的合资格股息（eligible dividend）按 38% 毛额化（dividend gross-up），联邦股息税收抵免为放大部分的 6/11（ITA s.121），卑诗省 2026 年省级抵免为放大后应税股息的 12%。 / Correct. An eligible dividend paid out of GRIP is grossed up by 38%, the federal dividend tax credit is 6/11 of the gross-up (ITA s.121), and the BC provincial credit for 2026 is 12% of the grossed-up taxable dividend.

b. ✗ 错用了非合资格股息（non-eligible dividend）的比例。15% 毛额化、联邦 9/13 与 BC 省 1.96% 适用于享小企业扣除的低税利润分红。 / Uses the ratios of a non-eligible dividend. The 15% gross-up, federal 9/13 and BC 1.96% apply to dividends paid from low-taxed profit that claimed the small business deduction.

c. ✗ 混用了联邦抵免分数且算错了省级基数。合资格股息的联邦抵免是毛额增量的 6/11（不是 9/13），且 BC 省 12% 抵免乘的是放大后的应税股息而非实际收到的现金。 / Mixes up the federal credit fraction and gets the provincial base wrong. The federal credit for an eligible dividend is 6/11 of the gross-up (not 9/13), and the BC 12% credit is applied to the grossed-up taxable dividend, not the actual cash received.

d. ✗ 臆造了毛额化比例。合资格股息的法定毛额化率自 2012 税年起长青固定为 38%（ITA s.82(1)(b)），并非直接按 27% 合计公司税率放大。 / Invents a gross-up rate. The statutory gross-up for an eligible dividend has been fixed at 38% since the 2012 tax year (ITA s.82(1)(b)); it is not derived from the 27% combined corporate rate.

52 答案 a

a. ✓ 正确。发工资须由雇员与公司各付 5.95% 的基本 CPP（合计 11.9%），并在 YMPE 至 $85,000（YAMPE）区间各付 4% 的第二层附加 CPP 供款（CPP2），$85,000 以上不再缴；同时因 Tariq 控制超过 40% 有表决权股份，按《雇佣保险法》s.5(2)(b) 属于不可保雇佣，免缴雇佣保险（EI）。 / Correct. Paying salary requires the employee and the corporation to each pay 5.95% base CPP (11.9% in total), and from the YMPE up to the $85,000 YAMPE each pays 4% second additional CPP contribution (CPP2), with nothing above $85,000; and because Tariq controls more than 40% of the voting shares, his employment is uninsurable under Employment Insurance Act s.5(2)(b), so no employment insurance (EI) premiums are due.

b. ✗ 落入控股股东照常缴 EI 陷阱。控制公司超过 40% 有表决权股份的股东，其雇佣关系按《雇佣保险法》s.5(2)(b) 直接属于不可保雇佣，不用缴 EI 保费，也不能领常规 EI 福利。 / Falls into the 'Paying EI as usual for a controlling shareholder' trap. A shareholder who controls more than 40% of the voting shares is in uninsurable employment under Employment Insurance Act s.5(2)(b), pays no EI premiums and cannot collect regular EI benefits.

c. ✗ 混淆了公司雇员与无限责任个体经营者的申报方式。没有公司的个体经营者才在 T1 上自己扛两份 CPP；公司发工资必须先开立薪资扣缴账户（payroll program account, RP），由公司代扣雇员部分并配缴雇主部分。 / Confuses a corporate employee with an unincorporated self-employed person. Only a self-employed person with no corporation carries both shares of CPP on his own T1; when a corporation pays salary it must first open a payroll program account (RP), withhold the employee share and match the employer share.

d. ✗ 忽略了 CPP2 的封顶上限。CPP2 仅对 YMPE 到 YAMPE（2026 年为 $85,000）之间那一段收入课征 4%，超过 $85,000 YAMPE 的部分不再缴纳。 / Ignores the CPP2 ceiling. CPP2 is charged at 4% only on income between the YMPE and the YAMPE ($85,000 in 2026); income above the $85,000 YAMPE is not charged.

52′ 答案 c

a. ✗ 落入控股股东照常缴 EI 陷阱。《雇佣保险法》s.5(2)(b) 规定的不可保雇佣门槛是控制超过 40% 的有表决权股份，而不是 50%；Nadia 持股 45% 已超过 40% 门槛。 / Falls into the 'Paying EI as usual for a controlling shareholder' trap. The uninsurable employment threshold in Employment Insurance Act s.5(2)(b) is control of more than 40% of the voting shares, not 50%; Nadia's 45% exceeds the 40% threshold.

b. ✗ 扩大了免除范围。超过 40% 表决权股份只免除雇佣保险（EI），并不免除加拿大退休金计划（CPP）；只要发放工资，雇员与雇主仍须各按 5.95% 缴纳 CPP。 / Overstates the exemption. Holding more than 40% of the voting shares exempts only employment insurance (EI), not the Canada Pension Plan (CPP); as long as salary is paid, the employee and the employer must each still pay 5.95% CPP.

c. ✓ 正确。因 Nadia 控制超过 40% 有表决权股份（45% > 40%），按《雇佣保险法》s.5(2)(b) 免缴 EI；但工资依然产生 CPP 可保收入，她本人与公司须各按 5.95% 配缴 CPP。 / Correct. Because Nadia controls more than 40% of the voting shares (45% > 40%), she is exempt from EI under Employment Insurance Act s.5(2)(b); but her salary still creates CPP pensionable earnings, and she and the corporation must each pay 5.95% CPP.

d. ✗ 违反了 CPP 对等供款规则。公司发放工资时，雇员与雇主必须各付一份 5.95% 的 CPP（合计 11.9%），雇员不能免缴。 / Violates the CPP matching rule. When a corporation pays salary, the employee and the employer must each pay a 5.95% share of CPP (11.9% in total); the employee cannot be exempt.

53 答案 d

a. ✗ 落入 TOSI 年龄与工时错配陷阱。实质参与经营（excluded business）排除要求在本年度、或者过去累计任意五个纳税年度（不需连续）平均每周工作达到或超过 20 小时；Rosa 已有六年达标，当年不工作也依然满足该排除。 / Falls into the 'Mismatching the age and hours tests for TOSI' trap. The excluded business exclusion requires an average of at least 20 hours a week in the current year or in any five prior tax years (not necessarily consecutive); Rosa has six qualifying years, so the exclusion is met even if she does not work this year.

b. ✗ 落入 TOSI 年龄与工时错配陷阱。合资格股份（excluded shares）要求收款人持有的表决权与市值均不低于 10%；Rosa 持有的是无表决权股且市值仅占 5%，不满足合资格股份排除。 / Falls into the 'Mismatching the age and hours tests for TOSI' trap. Excluded shares require the recipient to hold at least 10% of both the votes and the market value; Rosa holds non-voting shares worth only 5%, so the excluded shares exclusion is not met.

c. ✗ 误以为必须同时满足所有排除条件。分割收入税（TOSI）的三条排除线只需命中任意一条即可按收款人自己的边际税率课税，虽然 Victor 未满 65 岁，但 Rosa 已命中实质参与经营排除。 / Wrongly assumes all exclusion conditions must be met together. Only one of the three TOSI exclusions needs to be met for the dividend to be taxed at the recipient's own marginal rate; although Victor is not yet 65, Rosa has already met the excluded business exclusion.

d. ✓ 正确。根据实质参与经营（excluded business）排除规则，年满 18 岁的收款人在本年度或过去累计任意五个纳税年度中平均每周实际工作满 20 小时即可豁免 TOSI；Rosa 在过去六个纳税年度每周工作 25 小时，分红按她自己的边际税率课税。 / Correct. Under the excluded business exclusion, a recipient aged 18 or over who worked an average of at least 20 hours a week in the current year or in any five prior tax years is exempt from TOSI; Rosa worked 25 hours a week in each of the last six tax years, so her dividend is taxed at her own marginal rate.

53′ 答案 b

a. ✗ 落入 TOSI 年龄与工时错配陷阱。第三条排除线（ITA s.120.4(1.1)(c)）看的是创造收入的业主本人是否年满 65 岁，只要 Arthur 当年满 65 岁，配偶 Wendy 自己几岁不论。 / Falls into the 'Mismatching the age and hours tests for TOSI' trap. The third exclusion (ITA s.120.4(1.1)(c)) looks at whether the owner who generated the income is 65 or over; as long as Arthur is 65 this year, the spouse Wendy's own age is irrelevant.

b. ✓ 正确。根据 ITA s.120.4(1.1)(c) 的业主满 65 岁排除规则，创造收入的业主 Arthur 当年已满 65 岁，且这笔钱若由他本人收取不受 TOSI 限制，那么分给配偶 Wendy 也不受 TOSI 限制，按 Wendy 自己的边际税率课税。 / Correct. Under the owner-aged-65 exclusion in ITA s.120.4(1.1)(c), Arthur, who generated the income, is 65 in 2026, and if he had received the amount himself it would not be subject to TOSI; so paying it to his spouse Wendy is also not subject to TOSI and is taxed at Wendy's own marginal rate.

c. ✗ 落入 TOSI 年龄与工时错配陷阱。合资格股份（excluded shares）要求收款人同时持有不少于 10% 的表决权与 10% 的市值，Wendy 仅持 2% 无表决权股，无法走合资格股份排除。 / Falls into the 'Mismatching the age and hours tests for TOSI' trap. Excluded shares require the recipient to hold at least 10% of both the votes and the market value; Wendy holds only 2% non-voting shares, so the excluded shares exclusion is not available.

d. ✗ 混淆了工资与分红的规则。分红本来就不能在公司层面扣除，不适用针对工资费用的 s.67 合理性测试（reasonableness test）。 / Confuses the rules for salary and dividends. A dividend is never deductible at the corporate level in the first place, so the s.67 reasonableness test, which applies to salary expense, does not apply.

54 答案 b

a. ✗ 同时搞错了还款期限与利息规则。还款限期是借款那个公司税年结束后一年内（2027 年 12 月 31 日），且即便按时还清本金，零息借款仍须计算 s.80.4 推定利息福利。 / Gets both the repayment deadline and the interest rule wrong. The deadline is one year after the end of the corporation's tax year in which the loan was made (December 31, 2027), and even if the principal is repaid on time, a zero-interest loan still has a s.80.4 deemed interest benefit.

b. ✓ 正确。根据 ITA s.15(2)，股东贷款只要在放款那个公司税年（2026 年 12 月 31 日）结束后一年内（即 2027 年 12 月 31 日前）还清且非循环借还，本金不并入所得；但实付利息（0%）低于 CRA 规定利率（prescribed rate，2026 年 Q4 为 3%），差额仍须按 s.80.4 计入推定利息福利（deemed interest benefit）。 / Correct. Under ITA s.15(2), a shareholder loan repaid within one year after the end of the corporation's tax year in which it was made (December 31, 2026), that is, before December 31, 2027, and not part of a series of loans and repayments, does not have its principal included in income; but interest actually paid (0%) below the CRA prescribed rate (3% for 2026 Q4) still produces a s.80.4 deemed interest benefit on the difference.

c. ✗ 落入股东贷款免本金即免利息陷阱，且误把期限算成放款日起 365 天。条文规定的是放款那个公司税年结束后一年内（横跨两个公司年结日），且按期还款不免除 s.80.4 利息福利。 / Falls into the 'no principal inclusion means no interest benefit' trap, and also wrongly counts the deadline as 365 days from the advance. The rule is one year after the end of the corporation's tax year in which the loan was made (spanning two corporate year-ends), and repaying on time does not remove the s.80.4 interest benefit.

d. ✗ 混淆了滑单申报截止日与股东贷款还款期。次年 2 月最后一天是滑单申报截止日，不是 s.15(2) 的还款期限，且公司未收的利息不能作为费用扣除。 / Confuses the slip filing deadline with the loan repayment deadline. The last day of February of the next year is the slip filing deadline, not the s.15(2) repayment deadline, and interest the corporation did not collect cannot be deducted as an expense.

54′ 答案 a

a. ✓ 正确。借款发生在截至 2026 年 6 月 30 日的公司税年内，在该税年结束后一年内（2027 年 6 月 30 日前）的 2027 年 5 月 15 日还清，免除了 s.15(2) 本金并入；但实付 1% 低于 3% 规定利率（prescribed rate）的 2% 差额仍须按 s.80.4 计为推定利息福利。 / Correct. The loan was made in the corporation's tax year ending June 30, 2026 and repaid on May 15, 2027, within one year after that year-end (before June 30, 2027), so s.15(2) inclusion of the principal is avoided; but the 2% gap between the 1% actually paid and the 3% prescribed rate is still a deemed interest benefit under s.80.4.

b. ✗ 误将公司税年结束后一年内算成借款日起 12 个月。借款所在公司税年于 2026 年 6 月 30 日结束，还款宽限期截至 2027 年 6 月 30 日。 / Wrongly counts 'one year after the end of the corporation's tax year' as 12 months from the loan date. The corporation's tax year in which the loan was made ended June 30, 2026, so the grace period runs to June 30, 2027.

c. ✗ 落入股东贷款免本金即免利息陷阱。只要实付利率（1%）低于 CRA 公布的规定利率（3%），差额部分依然触发 s.80.4 的推定利息福利（deemed interest benefit）。 / Falls into the 'no principal inclusion means no interest benefit' trap. As long as the interest actually paid (1%) is below the CRA prescribed rate (3%), the difference still triggers a s.80.4 deemed interest benefit.

d. ✗ 落入滑单混报陷阱。按时归还已免除本金并入，且利息福利走 T4A 计入普通所得，绝非 T5 上的合资格股息。 / Falls into the slip-mixing trap. Timely repayment already removes the principal inclusion, and the interest benefit is reported on a T4A as ordinary income, never as an eligible dividend on a T5.

55 答案 c

a. ✗ 同时犯了打折条件错误与滑单混报错误。公务里程 7,000 / 18,000 未超过 50%，不能享受按私用公里打折；且股东福利不能报在 T5 上当股息。 / Makes both an error in the conditions for the reduction and a slip-mixing error. Business use of 7,000 of 18,000 km is not over 50%, so the reduction by personal kilometres is not available, and a shareholder benefit cannot be reported on a T5 as a dividend.

b. ✗ 混淆了买断车与租赁车的公式及申报表。2/3 是租赁车乘月租的系数，买断车应按每月 2% 乘原始成本；且因股东身份给的福利应报进 T4A 而非 T4。 / Confuses the formulas for an owned and a leased car and the reporting form. 2/3 is the factor for the monthly lease payment on a leased car; an owned car uses 2% of the original cost per month; and a benefit given because of shareholder status goes on a T4A, not a T4.

c. ✓ 正确。买断车待命费（standby charge）公式为每月 2% × 原始成本 × 可用月数（ITA s.6(1)(e)/(2)）；只有公务用途超过 50% 时才能按私用公里 ÷（1,667 × 12）打折，本题公务仅 7,000/18,000（低于 50%），按全额 $12,000 算；因股东身份取得的应税福利（taxable benefit）应报在 T4A 上（计入 T1 第 13000 行），不享股息抵免。 / Correct. The standby charge for an owned car is 2% per month x original cost x months available (ITA s.6(1)(e)/(2)); it can be reduced by personal km / (1,667 x 12) only when business use exceeds 50%, and here business use is only 7,000/18,000 (below 50%), so the full $12,000 applies; a taxable benefit received because of shareholder status goes on a T4A (included on line 13000 of the T1) and does not earn the dividend credit.

d. ✗ 落入滑单混报陷阱。股东福利报进 T4A 后属于普通所得（报在 T1 第 13000 行），不是股息，不能享受联邦或 BC 省的股息税收抵免（DTC）。 / Falls into the slip-mixing trap. A shareholder benefit reported on a T4A is ordinary income (on line 13000 of the T1), not a dividend, and does not earn the federal or BC dividend tax credit (DTC).

55′ 答案 d

a. ✗ 忽略了行车日志的证据要求。待命费（standby charge）只有在公务用途超过 50% 且备有私用与公务公里记录（行车日志）时才能打折，凭感觉估算无日志只能按全额计算。 / Ignores the evidence requirement of a mileage log. The standby charge can be reduced only if business use exceeds 50% and a record of personal and business kilometres (a logbook) is kept; an estimate without a log can only be charged in full.

b. ✗ 混淆了买断车与租赁车的计算公式。每月 2% 适用于买断车的原始成本，租赁车应按 2/3 × 月租计算。 / Confuses the formulas for an owned and a leased car. The 2% per month applies to the original cost of an owned car, whereas a leased car is charged at 2/3 x the monthly lease payment.

c. ✗ 误解了待命费减免机制。即便公务过半且有日志，也只是按私用公里 ÷（1,667 × 可用月数）比例打折，只要有私用就不会直接免除为 $0，更何况本题没有行车日志。 / Misunderstands how the standby charge is relieved. Even with more than half business use and a log, the charge is only reduced in proportion to personal km / (1,667 x months available); as long as there is personal use it never goes straight to $0, and in this case there is no logbook at all.

d. ✓ 正确。租赁车待命费（standby charge）按 2/3 × 月租 × 可用月数计算（ITA s.6(1)(e)/(2)）；待命费只有在公务用途超过 50% 且有里程日志记录时才能按私用公里 ÷（1,667 × 可用月数）打折，不记行车日志凭感觉估只能按全额 $7,200 计算。 / Correct. The standby charge for a leased car is 2/3 x monthly lease payment x months available (ITA s.6(1)(e)/(2)); the charge can be reduced by personal km / (1,667 x months available) only when business use exceeds 50% and mileage records exist, so without a logbook an estimate gives only the full $7,200.

56 答案 a

a. ✓ 正确。付给家庭成员的报酬必须通过 ITA s.67 合理性测试（reasonableness test），超出付给陌生人做同等工作公允市价（$3,000）的不合理部分（$62,000）公司不得扣除，但个人已收款项仍可能被追征导致双重不利；此外常规雇主的源头扣缴（payroll source deductions）须在每月 15 日前汇缴。 / Correct. Pay to a family member must pass the s.67 reasonableness test; the unreasonable portion ($62,000) above the fair market amount an unrelated person would be paid for the same work ($3,000) is not deductible by the corporation, although the individual may still be assessed on what was received, a double disadvantage; also, regular employer payroll source deductions must be remitted by the 15th of the following month.

b. ✗ 混淆了工资与分红的反避税规则。分割收入税（TOSI）及每周 20 小时排除线管辖的是分红等分拆收入，而支付给家庭成员的雇佣工资受 s.67 合理性测试与 business purpose 测试规制。 / Confuses the anti-avoidance rules for salary and dividends. Tax on split income (TOSI) and the 20-hour-a-week exclusion apply to split income such as dividends, whereas salary paid to a family member is governed by the s.67 reasonableness test and the business purpose test.

c. ✗ 误以为按时申报 T4 就能绕过实质审查。虽然 T4 滑单确须在次年 2 月最后一天前申报，但徒有其名或远超公允市价的家庭成员工资仍会被 CRA 按 s.67 打回扣除。 / Wrongly assumes that filing the T4 on time bypasses substantive review. A T4 must indeed be filed by the last day of February of the following year, but a salary to a family member that is nominal or far above fair market value can still be denied by the CRA under s.67.

d. ✗ 错配了罚税条款。20% 的 Part III.1 罚税专门针对公司超一般税率收入池（GRIP）余额错发合资格股息的行为，不适用于超额工资。 / Mismatches the penalty provision. The 20% Part III.1 penalty tax is aimed specifically at a corporation paying eligible dividends in excess of its general rate income pool (GRIP) balance and does not apply to excess salary.

56′ 答案 b

a. ✗ 混淆了工资合理性测试与 TOSI 满 65 岁分红排除。真实付出劳动、按公允市价领工资的配偶一直合法可扣，无需等业主满 65 岁。 / Confuses the salary reasonableness test with the TOSI age-65 dividend exclusion. A spouse who really works and is paid fair market salary is always deductible, with no need to wait until the owner is 65.

b. ✓ 正确。配偶真实提供服务且 $45,000 工资处于同类岗位市场公允区间（$42,000–$48,000）内，满足 business purpose 测试与 s.67 合理性测试（reasonableness test），公司可全额税前扣除；T4 滑单须于次年 2 月最后一天前完成发放与申报。 / Correct. The spouse actually provides services and the $45,000 salary is within the fair market range for the same kind of job ($42,000–$48,000), so it passes the business purpose test and the s.67 reasonableness test and the corporation can deduct it in full; the T4 must be issued and filed by the last day of February of the following year.

c. ✗ 违反了滑单互斥原则。T4 与 T5 是两张完全独立的表，同一笔钱绝对不能同时上两张单。 / Violates the rule that slips are mutually exclusive. A T4 and a T5 are two entirely separate slips, and the same money can never be reported on both.

d. ✗ 混淆了工资申报与资本股息账户（CDA）申报。T2054 当天申报要求仅适用于用 CDA 派发免税资本股息，发工资走的是 RP 薪资账户按月汇缴与次年 2 月底报 T4。 / Confuses salary reporting with the capital dividend account (CDA) filing. The same-day T2054 filing requirement applies only when a tax-free capital dividend is paid from the CDA; salary goes through the RP payroll account with monthly remittances and the T4 by the end of February.

第 9 章答案与解析

57 答案 b

a. ✗ 落入了『用借款日加一年算还款死线』的陷阱；ITA s.15(2.6) 的一年起算点是放款公司该税年结束之日（2026-12-31），而不是放款当天（2026-03-01）。 / Falls into the 'Counting the repayment deadline as one year from the loan date' trap; the starting point of the one year in ITA s.15(2.6) is the end of the lending corporation's tax year (2026-12-31), not the day of the loan (2026-03-01).

b. ✓ 首先，s.15(2.4) 的雇员股东购房例外（employee-shareholder exception）仅限『取得（购买）』供本人居住的住宅，装修不在其中，且她持股 100% 属指定雇员（specified employee）；因此只能走 s.15(2.6) 的一年内还清例外，死线为放款公司税年结束日（2026-12-31）之后一年，即 2027-12-31。 / First, the employee-shareholder home purchase exception in s.15(2.4) covers only 'acquiring (buying)' a dwelling for the person's own use, and renovation is not included; she also holds 100% of the shares and is a specified employee; so only the one-year repayment exception in s.15(2.6) is available, and the deadline is one year after the end of the lending corporation's tax year (2026-12-31), that is, 2027-12-31.

c. ✗ 混淆了本金还款死线与利息支付死线；次年 1 月 30 日（日历年结束后 30 天内）是支付实际利息以抵减 s.80.4 视同利息利益（deemed interest benefit）的截止日。 / Confuses the deadline for repaying principal with the deadline for paying interest; January 30 of the next year (within 30 days after the end of the calendar year) is the deadline for paying actual interest to reduce the s.80.4 deemed interest benefit.

d. ✗ 误读了 s.15(2.4) 住宅例外的适用范围；条文写的是『购买』供本人居住的住宅，借钱装修现有自住房不能适用该条例外。 / Misreads the scope of the s.15(2.4) residence exception; the provision says 'buying' a home for the person's own use, and borrowing to renovate an existing home cannot use that exception.

57′ 答案 d

a. ✗ 落入了『借款日加一年』的陷阱；必须先确定放款落入公司的哪一个税年，再从该税年结束日往后推一年。 / Falls into the 'one year from the loan date' trap; you must first determine which corporate tax year the loan falls in and then count one year after the end of that tax year.

b. ✗ 少算了一年；2027–01–31 只是放款所在公司税年的结束日，s.15(2.6) 允许在该税年结束之后再往后一年内还清。 / Counts one year short; 2027–01–31 is merely the end of the corporate tax year in which the loan was made, and s.15(2.6) allows repayment within one year after the end of that tax year.

c. ✗ 误把个人日历年当成起算点；s.15(2.6) 看的是放款方（公司）的税年结束日（1 月 31 日），而非 12 月 31 日。 / Wrongly uses the individual's calendar year as the starting point; s.15(2.6) looks at the tax year–end of the lender (the corporation), which is January 31, not December 31.

d. ✓ 公司的税年结束日为 1 月 31 日，2026 年 2 月 1 日放出的股东贷款（shareholder loan）落在 2027–01–31 结束的那个公司税年内；按 s.15(2.6) 往后推一年，还款死线为 2028–01–31。 / The corporation's tax year–end is January 31, so a shareholder loan made on February 1, 2026 falls in the corporate tax year ending 2027–01–31; counting one year after that under s.15(2.6) gives a repayment deadline of 2028–01–31.

58 答案 a

a. ✓ 因为她在 2027–12–31 死线前还清本金，本金不按 s.15(2) 计税，须按 s.80.4 计算视同利息利益（deemed interest benefit）：$80,000 × 规定利率（prescribed rate）3% × 306/365 ≈ $2,012；只要在日历年结束后 30 天内（即 2027 年 1 月 30 日或之前）实际付息即可抵为零。 / Because she repays the principal before the 2027–12–31 deadline, the principal is not taxed under s.15(2), and the s.80.4 deemed interest benefit must be computed: $80,000 x prescribed rate 3% x 306/365 = about $2,012; actually paying interest within 30 days after the end of the calendar year (on or before January 30, 2027) reduces it to zero.

b. ✗ 混淆了 s.15(2) 与 s.80.4 的互补关系；正因为走掉了 s.15(2.6) 的一年内还款例外、本金未被全额课税，才轮到 s.80.4 对白用公司资金的期间计算视同利息利益。 / Confuses the complementary relationship between s.15(2) and s.80.4; precisely because the one–year repayment exception in s.15(2.6) applies and the principal is not fully taxed, s.80.4 then computes a deemed interest benefit for the period the corporation's funds were used free of charge.

c. ✗ 把本金还款死线当成了利息抵减死线；s.80.4 明确要求抵减的利息必须在日历年结束后 30 天内（次年 1 月 30 日前）实际支付。 / Treats the principal repayment deadline as the interest offset deadline; s.80.4 requires that interest offsetting the benefit be actually paid within 30 days after the end of the calendar year (by January 30 of the next year).

d. ✗ 违反了 s.80.4(3)(b) 同一笔钱不双重课税的原则，且她在 2027 年 11 月（早于 2027–12–31 死线）还清本金，本金无需计入 2026 年收入。 / Violates the principle of s.80.4(3)(b) that the same money is not taxed twice, and she repaid the principal in November 2027 (before the 2027–12–31 deadline), so the principal need not be included in her 2026 income.

58′ 答案 c

a. ✗ 误以为购房贷款利率是『既封顶又托底』且永久不变；实际上它是只封顶不托底（利率下行时按当期较低利率算），且每满五年要重新锁定一次。 / Wrongly assumes the home purchase loan rate is both capped and floored and permanently fixed; in fact it is a cap only, with no floor (if rates fall, the lower current rate is used), and it is re-locked every five years.

b. ✗ 忽略了 s.80.4(4) 对符合条件的购房与搬迁贷款设有放款时规定利率封顶的保护规则。 / Overlooks the protection in s.80.4(4), which caps the prescribed rate at the rate at the time of the loan for qualifying home purchase and relocation loans.

c. ✓ 根据 ITA s.80.4(4) 与 (6)，购房与搬迁类借款的视同利息利益（deemed interest benefit）计算利率以放款当时的规定利率（prescribed rate）封顶、下行时按当期较低利率算；期限超过五年的，第五年末余额视同一笔新贷款，按那一刻的规定利率重新锁顶。 / Under ITA s.80.4(4) and (6), the rate used to compute the deemed interest benefit on a home purchase or relocation loan is capped at the prescribed rate in force when the loan was made (a lower current rate is used when rates fall); for a term longer than five years, the balance at the end of the fifth year is treated as a new loan and the cap is re-locked at the prescribed rate at that time.

d. ✗ 前五年期间只要是无息或低息借款，仍须按季计算 s.80.4 视同利息利益，并非免算五年。 / Even in the first five years, an interest-free or low-interest loan still has the s.80.4 deemed interest benefit computed each quarter; there is no five-year holiday.

59 答案 b

a. ✗ 落入了『s.85 拿超额票据仍以为零税负』的陷阱；虽然对价包含股份，但非股份对价（boot）$80,000 超过了税基合计 $52,000，不能再填 $52,000。 / Falls into the 'Assuming a s.85 transfer is tax-free even with excess boot' trap; although the consideration includes shares, the non-share consideration (boot) of $80,000 exceeds the total tax basis of $52,000, so the elected amount cannot be $52,000.

b. ✓ 根据 ITA s.85(1)(b)，选举金额（elected amount）的下限是所收非股份对价（boot）的公平市值；当票据开到 $80,000 时，超出税基 $52,000 的 $28,000 把选举金额下限顶到 $80,000，当年立刻产生 $28,000 的应税收益。 / Correct. Under ITA s.85(1)(b), the floor of the elected amount is the fair market value of the non-share consideration (boot); when the note is $80,000, the $28,000 above the $52,000 tax basis pushes the minimum elected amount up to $80,000, creating an immediate taxable gain of $28,000 in 2026.

c. ✗ 选举金额填得比 boot 低并不会使整份第 85 条转让（section 85 rollover）作废，法律是直接按 s.85(1)(b) 将选举金额自动调高到 boot 的公平市值 $80,000。 / Setting the elected amount below the boot does not void the whole section 85 rollover; the law simply raises the elected amount to the $80,000 fair market value of the boot under s.85(1)(b).

d. ✗ 混淆了公司欠股东的票据（boot）与股东欠公司的借款（shareholder loan）；票据是公司应付给关先生的对价，适用 s.85(1)(b) 确认转让收益，不适用 s.15(2)。 / Confuses a note owed by the corporation to the shareholder (boot) with a loan owed by the shareholder to the corporation (shareholder loan); the note is consideration payable by the corporation to Mr. Guan, governed by s.85(1)(b) recognition of gain on the transfer, not by s.15(2).

59′ 答案 a

a. ✓ 根据 s.85(1.1)，存货里的不动产不属于合格财产（eligible property），不能用 s.85 转进公司；根据 s.85(6)，T2057 必须在转让双方各自报税截止日中最早的那一天（2027–06–15 与 2027–11–30 取早，即 2027–06–15）之前单独递交。 / Correct. Under s.85(1.1), real property held as inventory is not eligible property and cannot be moved into a corporation under s.85; under s.85(6), T2057 must be filed separately by the earliest of the filing due dates of the two parties to the transfer (the earlier of 2027–06–15 and 2027–11–30, that is, 2027–06–15).

b. ✗ 自建商誉属于合格财产（可按税基 $0 选举转让）；且 T2057 不随 T2 一起递交，截止日取双方中最早的 2027–06–15 而非公司的 2027–11–30。 / Internally generated goodwill is eligible property (it can be rolled at a $0 tax basis by election); also, T2057 is not filed with the T2, and its deadline is the earlier date of the two parties, 2027–06–15, not the corporation's 2027–11–30.

c. ✗ 虽然找对了不合格财产，但错选了较晚的公司报税截止日；s.85(6) 规定取转让方与受让公司申报期限中最早的一个（2027–06–15）。 / It identifies the ineligible property correctly but picks the later corporate filing date; s.85(6) says to take the earliest of the filing deadlines of the transferor and the transferee corporation (2027–06–15).

d. ✗ 折旧设备属于合格财产（eligible property），可以通过 s.85 递延转让。 / Depreciable equipment is eligible property and can be transferred on a deferred basis under s.85.

60 答案 d

a. ✗ 落入了『漏算历年终身资本利得豁免冲减』的陷阱；未先按 s.39(9) 扣减往年资本利得扣除额的两倍（$60,000）。 / Falls into the trap of 'forgetting the offset for the lifetime capital gains exemption claimed in earlier years'; it fails to first reduce the loss by twice the prior–year capital gains deduction ($60,000) under s.39(9).

b. ✗ 同时犯了两个错误：既误用了从未生效的 66.67% 纳入率，又漏算了 s.39(9) 对往年终身资本利得豁免（LCGE）的冲减。 / Makes two errors at once: it uses the 66.67% inclusion rate that never took effect, and it ignores the s.39(9) reduction for the lifetime capital gains exemption (LCGE) claimed in earlier years.

c. ✗ 冲减倍数算错；s.39(9) 规定往年申报的 s.110.6 资本利得扣除额（$30,000）要按『两倍』（即当初被豁免的利得总额 $60,000）冲减本年的营业投资损失。 / Gets the multiplier of the reduction wrong; s.39(9) says the s.110.6 capital gains deduction claimed in earlier years ($30,000) reduces this year's business investment loss at 'twice' the amount (that is, the $60,000 of total gains originally exempted).

d. ✓ 根据 ITA s.39(9)，以前年度申报过的 s.110.6 资本利得扣除（$30,000）按两倍（即 $60,000）冲减本年的营业投资损失（business investment loss, BIL）；$50,000 的 BIL 被削成 $0，故可扣营业投资损失（ABIL）为 $0，该笔 $50,000 损失退回普通资本损失，只能抵资本利得。 / Correct. Under ITA s.39(9), a s.110.6 capital gains deduction claimed in earlier years ($30,000) reduces this year's business investment loss (BIL) at twice the amount ($60,000); the $50,000 BIL is cut to $0, so the allowable business investment loss (ABIL) is $0, and the $50,000 loss reverts to an ordinary capital loss that can offset only capital gains.

60′ 答案 b

a. ✗ 两处皆错：判 ABIL 只需在处置前 12 个月内任一时点符合 SBC 定义即可；且 ABIL 只能作为非资本亏损结转 10 年（普通非资本亏损才是 20 年）。 / Both parts are wrong: for an ABIL it is enough that the corporation met the SBC definition at any time in the 12 months before disposition; and an unused ABIL carries forward only 10 years as a non-capital loss (ordinary non-capital losses are 20 years).

b. ✓ 判可扣营业投资损失（ABIL）时，只要处置前 12 个月内的任何一个时点符合小企业公司（small business corporation, SBC）定义即可（倒闭前卖光设备剩现金不影响资格）；按 s.111，未用完的 ABIL 结转 10 年后转为净资本亏损（net capital loss），此后只能抵应税资本利得。 / Correct. For an allowable business investment loss (ABIL), it is enough that the corporation met the definition of a small business corporation (SBC) at any time in the 12 months before disposition (selling off the equipment before failure and being left with cash does not affect the status); under s.111, an unused ABIL carries forward 10 years and then becomes a net capital loss, which can thereafter offset only taxable capital gains.

c. ✗ ABIL 不要求连续 24 个月持有测试（那是处置前 12 个月内任一时点测试），且第 10 年后未用完的 ABIL 是转为可无限期结转的净资本亏损，而非彻底作废。 / An ABIL does not require a 24-month continuous holding test (the test is at any time in the 12 months before disposition), and an ABIL not used after year 10 becomes a net capital loss that can be carried forward indefinitely rather than expiring entirely.

d. ✗ 根据 s.39(1)(c)，触发 ABIL 必须是 s.50(1) 视同处置选举或与『非关联方』的真实处置；把烂股份卖给配偶属于关联方交易，不产生 ABIL。 / Under s.39(1)(c), an ABIL requires either a s.50(1) deemed disposition election or a real disposition to a person with whom he deals at arm's length; selling worthless shares to a spouse is a related-party transaction and produces no ABIL.

61 答案 c

a. ✗ 落入了『清算时拿个人 ACB 算视同股息』的头号陷阱；s.84(2) 的视同股息必须用分配款减去公司层面的 PUC（$1,000），不能减个人的 ACB（$61,000）。 / Falls into the number one trap of 'Using the personal ACB to compute the deemed dividend on a wind-up'; the s.84(2) deemed dividend must be the distribution minus the corporation-level PUC ($1,000), not the personal ACB ($61,000).

b. ✗ 忽略了 s.88(2) 允许将清算股息中不超过 CDA 余额的 $40,000 视同独立股息并作 s.83(2) 免税选举，也漏算了 s.112(3)(a) 止损规则对资本损失的 $40,000 调减。 / Ignores that s.88(2) allows the part of the wind-up dividend not exceeding the CDA balance ($40,000) to be treated as a separate dividend and elected as a tax-free capital dividend under s.83(2), and also misses the $40,000 reduction of the capital loss under the s.112(3)(a) stop-loss rule.

c. ✓ 第一步按 s.84(2) 算视同股息（deemed dividend）：$300,000 − 实缴资本（PUC）$1,000 = $299,000；第二步切出资本股息账户（CDA）余额内的 $40,000 作 s.83(2) 免税选举，余下 $259,000 为应税股息；第三步算股份处置：处置对价 $300,000 剔除视同股息 $299,000 得 $1,000，减去调整成本基础（ACB）$61,000 得未调整资本损失 $60,000，再按 s.112(3)(a) 止损规则扣减已免税收到的 $40,000 资本股息，最终可认的资本损失为 $20,000（这是资本损失本身，可扣的一半即允许资本损失为 $10,000）。 / Step one computes the deemed dividend under s.84(2): $300,000 − paid-up capital (PUC) $1,000 = $299,000. Step two carves out $40,000 within the capital dividend account (CDA) balance for a tax-free s.83(2) election, leaving $259,000 as a taxable dividend. Step three computes the disposition of the shares: proceeds of $300,000 less the $299,000 deemed dividend gives $1,000, minus the adjusted cost base (ACB) of $61,000 gives an unadjusted capital loss of $60,000, then the s.112(3)(a) stop-loss rule reduces it by the $40,000 capital dividend received tax-free, for a final recognized capital loss of $20,000 (this is the capital loss itself; the deductible half, the allowable capital loss, is $10,000).

d. ✗ 把公司清算分配当成了向第三方卖股票；公司清算必须先按 s.84(2) 将超过 PUC 的部分定性为视同股息，再将视同股息从处置对价中剔除。 / Treats the wind-up distribution as a sale of shares to a third party; on a wind-up, the part above PUC must first be characterized as a deemed dividend under s.84(2), and the deemed dividend is then removed from the proceeds of disposition.

61′ 答案 b

a. ✗ 超额选举不会使 CDA 真实余额内的 $40,000 免税部分自动作废；惩罚针对的是超出的 $10,000 部分。 / An excessive election does not automatically void the $40,000 tax-free part that is within the real CDA balance; the penalty targets only the $10,000 excess.

b. ✓ 根据 ITA s.184，资本股息（capital dividend）选举金额超过资本股息账户（CDA）余额的部分（$10,000），公司要缴 3/5 的第三部分税（Part III tax）；救济是在超额评税通知书发出后 90 天内再作一次选举，把超额部分改按应税股息处理。 / Correct. Under ITA s.184, the part of a capital dividend election that exceeds the capital dividend account (CDA) balance ($10,000) bears 3/5 Part III tax for the corporation; the relief is to make another election within 90 days after the notice of assessment for the excess, treating the excess as a taxable dividend.

c. ✗ 混淆了不同条文的罚则；每月 $100、封顶 $8,000 是 s.85(8) 资产转让选举或 s.220(3.2) 迟报选举的罚金，不是 s.184 超额资本股息的第三部分税。 / Confuses the penalties of different provisions; $100 a month capped at $8,000 is the penalty for s.85 transfer elections or late-filed elections under s.220(3.2), not the Part III tax on an excessive capital dividend under s.184.

d. ✗ CDA 超额选举与终身资本利得豁免（LCGE）没有自动抵扣关系，超额部分触发的是公司层面的 3/5 第三部分税。 / There is no automatic offset between an excessive CDA election and the lifetime capital gains exemption (LCGE); the excess triggers 3/5 Part III tax at the corporate level.

62 答案 a

a. ✓ 根据 ITA s.159(2)(3)，法定代表人（legal representative）在向股东分配公司财产之前，必须先凭 TX19 取得清税证明书（clearance certificate）；未取得证书就先分钱的，在已分配财产价值（$300,000）的范围内对公司欠缴的税款、利息与罚金承担个人连带责任。 / Correct. Under ITA s.159(2)(3), before distributing the corporation's property to shareholders, the legal representative must first obtain the clearance certificate with TX19; one who distributes without a certificate is personally and jointly liable for the corporation's unpaid tax, interest and penalties up to the value of the property distributed ($300,000).

b. ✗ RC145 只是最后一步用来关闭营业号下各程序账户的申请表，不能免除未取得 TX19 清税证明书就先行分配财产所触发的 s.159(3) 个人责任。 / RC145 is only the application form in the last step for closing the program accounts under the business number, and it cannot remove the s.159(3) personal liability triggered by distributing property without first obtaining the TX19 clearance certificate.

c. ✗ $8,000 是迟报选举的封顶罚金；s.159(3) 的个人责任上限是『已分配财产的价值』（本例高达 $300,000），而非 $8,000。 / $8,000 is the maximum penalty for a late election; the cap of personal liability under s.159(3) is 'the value of the property distributed' (as high as $300,000 here), not $8,000.

d. ✗ 税法并不宣告转账在公司法上无效，而是直接依据 s.159(3) 让先分钱的法定代表人自己掏腰包赔付公司欠税。 / The tax law does not declare the transfer void under corporate law; instead s.159(3) makes the legal representative who distributed first personally liable to pay the corporation's tax.

62′ 答案 d

a. ✗ 把最致命的两步全做反了：不能在拿到 TX19 清税证明书之前分钱，且公司一旦注销就不存在了，CDA 选举必须在注销前完成。 / Reverses the two most fatal steps: money cannot be distributed before the TX19 clearance certificate is obtained, and once the corporation is dissolved it no longer exists, so the CDA election must be completed before dissolution.

b. ✗ 顺序颠倒：申请 TX19 清税证明书必须附上『最终 T2 的评税通知书』，因此必须先报最终 T2 并拿到评税通知书才能申请 TX19，而 RC145 关户排在最后一步。 / The order is reversed: the TX19 application must attach the final T2 notice of assessment, so the final T2 must be filed and its notice of assessment received before applying for TX19, and the RC145 closing of accounts comes last.

c. ✗ 在还没申报最终 T2 并取得最终 T2 评税通知书（含 Schedule 100 资产分配信息）之前，无法完成 TX19 清税证明书的申请。 / Before the final T2 is filed and its notice of assessment (including Schedule 100 asset distribution information) is obtained, the TX19 clearance certificate application cannot be completed.

d. ✓ 正确的七步法定顺序是：①股东决议 → ②变现资产清偿债务 → ③报最终 T2（第 078 行勾『是』）→ ④凭最终 T2 评税通知书等三份材料交 TX19 申请清税证明书（clearance certificate）→ ⑤收到清税证明书 → ⑥向股东分配剩余财产并在注销前完成 s.83(2) CDA 选举 → ⑦用 RC145 关闭营业号程序账户。 / The correct seven statutory steps are: (1) shareholder resolution, (2) realize assets and pay debts, (3) file the final T2 (answer 'Yes' on line 078), (4) apply for the TX19 clearance certificate with three documents including the final T2 notice of assessment, (5) receive the clearance certificate, (6) distribute the remaining property to shareholders and complete the s.83(2) CDA election before dissolution, (7) close the program accounts under the business number with RC145.

63 答案 c

a. ✗ 忽略了 s.50(1) 触发年份的唯一性；四个条件在某一个年末同时成立的那一年（2024 年）就是唯一可以正常作 s.50(1) 选举的年份，不能随便挪到 2026 年。 / Overlooks that the year in which s.50(1) is triggered is unique; the one year in which the four conditions are all met at year-end (2024) is the only year in which the s.50(1) election can be made in the normal way, and it cannot be moved to 2026 at will.

b. ✗ 虽然错过了 2024 当年的正常申报，但税法在 s.220(3.2) 下留有税年结束后十个日历年内的迟报选举救济窗口，并非永久丧失。 / Although he missed the normal filing for 2024, the tax law leaves a late-election relief window under s.220(3.2) of ten calendar years after the end of the tax year, so the loss is not permanent.

c. ✓ 第 50(1) 条选举（subsection 50(1) election）只能在四个条件于年末同时成立的那一年（2024 年）作出；既然该年已过去，只能按 s.220(3.2) 走迟报选举（窗口为税年结束后十个日历年，罚金为 $8,000 与 $100 × 完整月数取小）。 / A subsection 50(1) election can be made only in the year (2024) in which the four conditions all hold at year-end; since that year has passed, a late election under s.220(3.2) is the only way (the window is ten calendar years after the tax year-end, and the penalty is the lesser of $8,000 and $100 x full months).

d. ✗ 根据 s.39(1)(c)，向关联方（如配偶）转让股份不能触发营业投资损失（BIL）。 / Under s.39(1)(c), a transfer of shares to a related person (such as a spouse) cannot trigger a business investment loss (BIL).

63′ 答案 a

a. ✓ 根据 ITA s.88(2)，清算（winding-up）时分给股东的每一项财产均按公平市值视同处置，公司当年要认列相应的收入回收、折旧回收与资本利得，把车和电脑直接过户给股东并非零税事件。 / Correct. Under ITA s.88(2), on a winding-up each property distributed to shareholders is deemed disposed of at its fair market value, and the corporation recognizes the resulting income inclusions, recapture of depreciation and capital gains in the year; transferring the van and computers directly to the shareholder is not a tax-free event.

b. ✗ 普通小公司向个人股东清算适用的是 s.88(2) 而非免税结转；财产按公平市值视同处置，不存在自动按未折旧资本成本（UCC）零税过户的待遇。 / A wind-up of an ordinary small corporation into individual shareholders falls under s.88(2), not a tax-free rollover; the property is deemed disposed of at fair market value, and there is no automatic transfer at undepreciated capital cost (UCC) with no tax.

c. ✗ 清算分配是股东身份下的分配，公司在 s.88(2) 下按市值视同处置资产，股东则按 s.84(2) 与资本损益规则计税，不是雇佣福利。 / A liquidation distribution is made to shareholders in their capacity as shareholders; the corporation is deemed to dispose of the assets at market value under s.88(2) and the shareholder is taxed under s.84(2) and the capital gain and loss rules; it is not an employment benefit.

d. ✗ 违反了『公司与股东是两个独立纳税主体』的底层逻辑；财产在清算离开公司那一刻即按公平市值视同处置。 / Violates the underlying logic that the corporation and the shareholder are two separate taxpayers; the property is deemed disposed of at fair market value the moment it leaves the corporation on liquidation.

第 10 章答案与解析

64 答案 a

a. ✓ 正确。Marco 是以股东身份（因为公司是他的）而非雇员身份获得私人住宅装修，走股东福利（shareholder benefit, ITA s.15(1)）路径：由于该支出不是为赚取经营收入而发生（过不了 s.18(1)(a)），公司不得扣除这 $18,000，而 Marco 个人仍须全额计入收入，并报在 T4A 表的 code 028（其他收入）栏。 / Correct. Marco receives the private home renovation as a shareholder (because the corporation is his), not as an employee, so it follows the shareholder benefit (ITA s.15(1)) path: because the expense was not incurred to earn business income (it fails s.18(1)(a)), the corporation cannot deduct the $18,000, while Marco must still include the full $18,000 in income, reported on a T4A slip in code 028 (other income).

b. ✗ 错误。这是「同时是雇员和股东却一律按雇员报」的典型陷阱。如果 Marco 不是股东，公司根本不会替他装修私人厨房，因此事实判据属于股东福利（s.15(1)）而非受雇福利（taxable employment benefit, s.6(1)(a)），公司拿不到扣除。 / Wrong. This is the classic trap of treating a person who is both employee and shareholder always as an employee. If Marco were not a shareholder, the corporation would never renovate his private kitchen, so the factual test points to a shareholder benefit (s.15(1)) rather than a taxable employment benefit (s.6(1)(a)), and the corporation gets no deduction.

c. ✗ 错误。公司直接替股东支付私人装修并记入公司费用，属于直接授予股东福利（s.15(1)），本金 $18,000 全额计入收入并报 T4A code 028；只有股东贷款产生的推定利息福利（deemed interest benefit, s.80.4）才报 code 117。 / Wrong. The corporation directly paying a shareholder's private renovation and recording it as a corporate expense is a benefit conferred directly on a shareholder (s.15(1)); the full $18,000 principal is included in income and reported on a T4A code 028; only the deemed interest benefit (s.80.4) from a shareholder loan is reported under code 117.

d. ✗ 错误。公司能否扣除与个人是否计入收入是两道各自独立的闸；走上 s.15(1) 股东福利路径的后果正是公司不得扣除、个人照样全额计税，两级税负直接叠加，没有税收整合（integration）。 / Wrong. Whether the corporation can deduct and whether the individual includes the amount are two independent gates; going down the s.15(1) shareholder benefit path means precisely that the corporation cannot deduct and the individual is still taxed on the full amount, so the two levels of tax stack with no integration.

64′ 答案 c

a. ✗ 错误。其他雇员都没有这项福利，说明 Elena 是因持股身份而非受雇身份拿到这笔家庭度假费，不能按受雇福利（ITA s.6(1)(a)）在公司税前扣除并报 T4。 / Wrong. Other employees do not receive this benefit, which shows that Elena received the family holiday cost because she is a shareholder and not because she is an employee, so it cannot be deducted before tax by the corporation as an employee fringe benefit (ITA s.6(1)(a)) and reported on a T4.

b. ✗ 错误。根据股东福利规则（shareholder benefit, ITA s.15(1)），公司向股东或其关系人授予的福利，由股东本人（Elena）全额计入当年收入，而不是转嫁给未持股的父母申报。 / Wrong. Under the shareholder benefit rule (ITA s.15(1)), a benefit conferred by the corporation on a shareholder or a person connected to her is included in full in the shareholder's (Elena's) income for the year; it is not shifted to the parents, who hold no shares, to report.

c. ✓ 正确。替股东及其父母付私人度假费与赚取经营收入无关，过不了 ITA s.18(1)(a) 目的检验，公司不得扣除；同时按 ITA s.15(1) 股东福利规则，全额 $9,500 计入股东 Elena 的个人收入，报在 T4A code 028。 / Correct. Paying a private holiday for a shareholder and her parents has nothing to do with earning business income and fails the ITA s.18(1)(a) purpose test, so the corporation cannot deduct it; and under the ITA s.15(1) shareholder benefit rule, the full $9,500 is included in the shareholder Elena's personal income and reported on a T4A code 028.

d. ✗ 错误。身份判据看的是事实而非账务或扣缴动作，属于股东身份拿到的私人消费不能通过补做源头扣缴变成可扣除的雇员薪酬。 / Wrong. The capacity test looks at the facts, not at the bookkeeping or withholding steps; a private consumption received in the capacity of shareholder cannot be turned into deductible employee remuneration by withholding source deductions after the fact.

65 答案 b

a. ✗ 错误。$5,769.52 是雇员个人的三项最高扣款合计（$4,230.45 + $416 + $1,123.07）。雇主在 CPP 和 CPP2 上确实是 1:1 配比，但在就业保险（Employment Insurance, EI）上是雇员保费的 1.4 倍（$1,572.30），不能按 1:1 算。 / Wrong. $5,769.52 is the total of the employee's own three maximum deductions ($4,230.45 + $416 + $1,123.07). The employer does match 1:1 on CPP and CPP2, but on employment insurance (EI) it pays 1.4 times the employee premium ($1,572.30) and cannot be computed 1:1.

b. ✓ 正确。年薪 $92,000 已超过 2026 年三项上限：CPP 最高应计供款收入（YMPE）$74,600 减去基本免税额 $3,500 后乘 5.95% = $4,230.45（雇主 1:1 配比）；CPP2 第二层区间 $74,600 至 $85,000 共 $10,400 乘 4% = $416.00（雇主 1:1 配比）；EI 最高可保收入（MIE）$68,900 乘 1.63% 得雇员最高保费 $1,123.07，雇主按 1.4 倍承担 $1,572.30。三项雇主成本合计 $4,230.45 + $416.00 + $1,572.30 = $6,218.75。 / Correct. A salary of $92,000 exceeds all three 2026 ceilings: CPP maximum pensionable earnings (YMPE) of $74,600 less the $3,500 basic exemption, times 5.95%, is $4,230.45 (matched 1:1 by the employer); the CPP2 second-tier range of $74,600 to $85,000, or $10,400, times 4% is $416.00 (matched 1:1 by the employer); EI maximum insurable earnings (MIE) of $68,900 times 1.63% gives the employee maximum premium of $1,123.07, and the employer bears 1.4 times, or $1,572.30. The three employer costs total $4,230.45 + $416.00 + $1,572.30 = $6,218.75.

c. ✗ 错误。这是把 2024 年 CPP2 刚上线时的第一年上限 $188 当成了 2026 年现行数字；2026 年 CPP2 第二层上限（YAMPE）为 $85,000，最高供款为 $416.00。 / Wrong. This takes the first-year CPP2 limit of $188 from its 2024 launch as the 2026 figure; the 2026 CPP2 second-tier ceiling (YAMPE) is $85,000 and the maximum contribution is $416.00.

d. ✗ 错误。CPP 的 $3,500 基本免税额（basic exemption）不会因为高薪而消失，第一层 CPP 始终按（$74,600 − $3,500）× 5.95% = $4,230.45 封顶。 / Wrong. The CPP $3,500 basic exemption does not disappear because of high pay; first-tier CPP is always capped at ($74,600 – $3,500) x 5.95% = $4,230.45.

65′ 答案 a

a. ✓ 正确。这是讲义重点强调的判断：EI 雇员费率虽然从 2024 年的 1.66% 一路降到 2026 年的 1.63%，但最高可保收入（Maximum Insurable Earnings, MIE）从 $63,200 升到了 $68,900，两个数字反向变动，乘出来的 2026 年雇员最高保费（$1,123.07）与雇主最高保费（$1,572.30）仍然逐年上升。 / Correct. This is the judgment the lecture stresses: although the EI employee rate fell from 1.66% in 2024 to 1.63% in 2026, the maximum insurable earnings (MIE) rose from $63,200 to $68,900; the two numbers move in opposite directions, and the product, the 2026 employee maximum premium ($1,123.07) and employer maximum premium ($1,572.30), still rises year by year.

b. ✗ 错误。这是「只看费率判断保费涨跌」的典型陷阱，忽略了可保收入上限（MIE）从 $63,200 大幅上调至 $68,900 的影响。 / Wrong. This is the classic trap of judging whether premiums rise or fall from the rate alone, ignoring the large increase of the maximum insurable earnings (MIE) from $63,200 to $68,900.

c. ✗ 错误。CPP 基本免税额（basic exemption）$3,500 从 1997 年冻结至今不指数化，因此随着 YMPE 升至 $74,600，CPP 的实际有效费率其实在悄悄上升。 / Wrong. The CPP basic exemption of $3,500 has been frozen since 1997 and is not indexed, so as the YMPE rises to $74,600, the effective CPP rate is actually creeping up.

d. ✗ 错误。1.4 倍配比只适用于就业保险（EI）；CPP 与 CPP2 的雇主配比均为 1:1（各 $4,230.45 与 $416）。 / Wrong. The 1.4 multiple applies only to employment insurance (EI); the employer match for both CPP and CPP2 is 1:1 ($4,230.45 and $416 respectively).

66 答案 c

a. ✗ 错误。这是「减免待命费只看业务占比」的经典陷阱。减免待命费（reduced standby charge, ITA s.6(2)）要求两个并列条件：业务用途过半，并且个人里程不超过每 30 天 1,667 公里（全年 20,004 公里）。她的个人里程为 21,000 公里，超过了 20,004 公里上限，因此拿不到减免待命费。 / Wrong. This is the classic trap of 'reducing the standby charge by looking only at business use'. The reduced standby charge (ITA s.6(2)) has two parallel conditions: business use over half, and personal kilometres not over 1,667 km per 30 days (20,004 km a year). Her personal kilometres are 21,000, above the 20,004 limit, so she does not get the reduced standby charge.

b. ✗ 错误。个人里程 21,000 公里超过 20,004 公里，确实使她失去减免待命费资格（待命费按全额 2% × $50,000 × 12 = $12,000）；但运营费用福利的选择性算法（optional calculation）只要求「有待命费且业务用途过半」，她业务占 58%，仍可用选择性算法。 / Wrong. Personal kilometres of 21,000 exceed 20,004, which does cost her the reduced standby charge (the standby charge is the full 2% x $50,000 x 12 = $12,000); but the optional calculation of the operating expense benefit requires only 'a standby charge exists and business use is over half', and her business use is 58%, so she can still use the optional calculation.

c. ✓ 正确。减免待命费（reduced standby charge）必须同时满足「业务用途过半」和「个人里程不超过 1,667 公里 / 30 天（全年 20,004 公里）」两个条件；她个人跑了 21,000 公里，减免资格消失，待命费按全额 2% × $50,000 × 12 = $12,000。运营费用福利（operating expense benefit）的选择性算法前提是「有待命费且业务用途过半」（她业务 29,000 ÷ 50,000 = 58%），没有 20,004 公里这一条，所以仍可用：$12,000 的一半 = $6,000，比固定费率法 21,000 × 34¢ = $7,140 低。 / Correct. The reduced standby charge must meet both 'business use over half' and 'personal kilometres not over 1,667 km per 30 days (20,004 km a year)'; she drove 21,000 personal kilometres, so the reduction is lost and the standby charge is the full 2% x $50,000 x 12 = $12,000. The optional calculation of the operating expense benefit requires 'a standby charge and business use over half' (her business use is 29,000 / 50,000 = 58%) and has no 20,004 km condition, so it is still available: half of $12,000 = $6,000, which is lower than the fixed-rate method of 21,000 x 34 cents = $7,140.

d. ✗ 错误。税法中没有「业务里程超过 25,000 公里免除运营费用福利」的规则；且分子 A 取 20,004 时，A/B = 20,004/20,004 = 1，实质上就是没有任何减免的全额待命费。 / Wrong. The tax law has no rule that 'business kilometres over 25,000 remove the operating expense benefit'; also, with A at 20,004, A/B = 20,004/20,004 = 1, which is effectively the full standby charge with no reduction.

66′ 答案 b

a. ✗ 错误。个人里程 12,000 公里虽低于 20,004 公里，但业务用途只占 45%，未过半，不满足减免待命费（reduced standby charge）的第一个条件，待命费不能打折。 / Wrong. Personal kilometres of 12,000 are below 20,004, but business use is only 45%, not over half, so the first condition for the reduced standby charge is not met and the standby charge cannot be cut.

b. ✓ 正确。减免待命费与运营费用福利的选择性算法（optional calculation）都要求业务用途过半；本例业务只占 45%，两项都不可用。自有车待命费按全额：2% × $45,000 × 12 ＝ $10,800；运营费用福利只能用固定费率法：12,000 公里 × 34¢ ＝ $4,080。 / Correct. Both the reduced standby charge and the optional calculation of the operating expense benefit require business use over half; here business use is only 45%, so neither is available. The standby charge on an owned car is the full 2% x $45,000 x 12 = $10,800; the operating expense benefit can use only the fixed-rate method: 12,000 km x 34 cents = $4,080.

c. ✗ 错误。选择性算法（按待命费的一半计算）不仅要求存在待命费，还要求业务用途过半；业务仅占 45% 时不能用，$5,400 的算法不成立。 / Wrong. The optional method (half of the standby charge) requires both a standby charge and business use over half; with business use at only 45% it cannot be used, so the $5,400 calculation does not hold.

d. ✗ 错误。公司车辆产生的应税福利属于非现金福利，不构成可保收入（insurable earnings），因此只需扣缴 CPP 与所得税，不扣缴 EI。 / Wrong. Taxable benefits from a company car are non-cash benefits and are not insurable earnings, so only CPP and income tax are withheld, and not EI.

67 答案 a

a. ✓ 正确。根据财政部 2026-01-14 新闻稿，2026 年新购 Class 10.1 乘用车 CCA 上限已宣布升至 $39,000（但《所得税条例》ITR s.7307(1) 截至 2026-06-21 的合订本文本仍写 $38,000，须并列说明）；同时雇员开私家车办公事的合理免税里程津贴（reasonable per-kilometre allowance）在各省为前 5,000 公里 73¢/km、其后 67¢/km。 / Correct. According to the Department of Finance news release of 2026-01-14, the CCA ceiling for a newly purchased Class 10.1 passenger vehicle in 2026 has been announced to rise to $39,000 (but the text of ITR s.7307(1) in the consolidation as of 2026-06-21 still reads $38,000, which must be stated alongside); and the reasonable tax-free per-kilometre allowance for an employee driving a personal vehicle on business is 73 cents/km for the first 5,000 km and 67 cents/km thereafter in the provinces.

b. ✗ 错误。$61,000 是 Class 54 零排放乘用车（zero-emission passenger vehicle）的 CCA 上限，不是普通乘用车上限；34¢/km 是雇员开公司车办私事的运营费用福利固定费率（operating expense benefit），不是雇员开私家车办公事的里程津贴。 / Wrong. $61,000 is the CCA ceiling for a Class 54 zero-emission passenger vehicle, not the ordinary passenger vehicle ceiling; 34 cents/km is the fixed rate of the operating expense benefit for an employee driving a company car for personal use, not a mileage allowance for an employee driving a personal vehicle on business.

c. ✗ 错误。77¢ / 71¢ 是 2026 年三个领地（territories）的免税里程津贴标准，卑诗省等各省（provinces）的标准是 73¢ / 67¢。 / Wrong. 77 cents / 71 cents is the 2026 tax-free mileage allowance standard for the three territories; for provinces such as British Columbia the standard is 73 cents / 67 cents.

d. ✗ 错误。这是把方向彻底搞反了：工程师开自己的车替公司跑业务，公司按合理里程津贴付钱给她是免税的，不是她欠公司 34¢/km 的运营费用福利；且 $1,100 / 月是租入车的月租金扣除上限（leasing deduction limit），不是购车的 CCA 折旧额。 / Wrong. This reverses the direction completely: when an engineer drives her own car on the firm's business, the firm paying her a reasonable mileage allowance is tax-free, and she does not owe the firm a 34 cents/km operating expense benefit; also, $1,100 a month is the leasing deduction limit for a leased vehicle, not CCA depreciation on a purchased one.

67′ 答案 d

a. ✗ 错误。73¢ / 67¢ 是雇员开私家车办公事的合理免税里程津贴（reasonable per-kilometre allowance）；开公司车办私事的运营费用福利固定费率是 34¢/km。 / Wrong. 73 cents / 67 cents is the reasonable tax-free per-kilometre allowance for an employee driving a personal vehicle on business; the fixed rate for the operating expense benefit when an employee drives a company car for personal use is 34 cents/km.

b. ✗ 错误。$61,000 是 Class 54 零排放乘用车的 CCA 资本成本上限，而月租金扣除上限是 $1,100（税前）。 / Wrong. $61,000 is the CCA capital cost ceiling for a Class 54 zero-emission passenger vehicle, whereas the monthly deductible lease limit is $1,100 (before tax).

c. ✗ 错误。34¢/km（汽车销售或租赁雇员为 31¢/km）是开公司车产生个人里程时的应税运营费用福利费率（operating expense benefit），方向是计入雇员收入而非免税津贴。 / Wrong. 34 cents/km (31 cents/km for employees of automobile sales or leasing businesses) is the taxable operating expense benefit rate when personal kilometres are driven in a company car, in the direction of inclusion in the employee's income, not a tax-free allowance.

d. ✓ 正确。2026 税年乘用车的月租金扣除上限（leasing deduction limit）为 $1,100 / 月（税前），新车贷利息扣除上限（interest deduction limit）为 $350 / 月，两者在 2026 年均已生效且与条例文本一致。 / Correct. For the 2026 tax year the leasing deduction limit for a passenger vehicle is $1,100 a month (before tax) and the interest deduction limit on a new vehicle loan is $350 a month, both in force for 2026 and consistent with the text of the regulations.

68 答案 b

a. ✗ 错误。这里同时踩中两个陷阱：第一，年结日 2026-12-31 之后第 180 天是 2027 年 6 月 29 日，7 月 15 日支付已超过未付薪酬规则（unpaid remuneration rule, ITA s.78(4)）的 180 天死线，2026 年不得扣除；第二，CRA 的 $500 非现金礼品政策明文排除股东及亲属（non-arm's length exclusion），Chen 的 $450 礼篮必须全额计税。 / Wrong. This steps into two traps at once: first, the 180th day after the year-end of 2026-12-31 is June 29, 2027, so payment on July 15 is past the 180-day deadline of the unpaid remuneration rule (ITA s.78(4)) and the bonus cannot be deducted in 2026; second, the CRA's $500 non-cash gift policy expressly excludes shareholders and relatives (non-arm's length exclusion), so Chen's $450 gift basket is fully taxable.

b. ✓ 正确。根据 ITA s.78(4) 未付薪酬规则（unpaid remuneration rule），2026-12-31 年结后第 180 天为 2027 年 6 月 29 日，7 月 15 日才付导致公司 2026 年扣除被取消，改到实际支付的 2027 年才能扣除；根据 CRA 礼品与奖励政策（gifts and awards policy），公平交易店员 $500 以内的非现金礼品免税，但股东及亲属被明文排除，Chen 的 $450 全额应税。 / Correct. Under the ITA s.78(4) unpaid remuneration rule, the 180th day after the 2026-12-31 year-end is June 29, 2027; payment on July 15 cancels the corporation's 2026 deduction and moves it to 2027, the year of actual payment. Under the CRA gifts and awards policy, a non-cash gift of up to $500 to an arm's length clerk is tax-free, but shareholders and relatives are expressly excluded, so Chen's $450 is fully taxable.

c. ✗ 错误。ITA s.78(4) 的死线是精确的「税年结束后第 180 天」（对 12 月 31 日年结而言是次年 6 月 29 日），不是 6 个月加 30 天；此外公平交易店员收到的 $450 非现金礼篮在 $500 额度内免税。 / Wrong. The deadline in ITA s.78(4) is exactly 'the 180th day after the end of the tax year' (June 29 of the next year for a December 31 year-end), not six months plus 30 days; also, the $450 non-cash gift basket received by an arm's length clerk is tax-free within the $500 limit.

d. ✗ 错误。错过 180 天死线的后果是计提年度（2026）不得扣除，改为在实际支付的那一年（2027）扣除，并非永久不得扣除；且股东 Chen 不适用 $500 免税额。 / Wrong. The consequence of missing the 180-day deadline is that the deduction is denied in the year of accrual (2026) and moves to the year of actual payment (2027); it is not permanently non-deductible; also, the shareholder Chen does not get the $500 exemption.

68′ 答案 d

a. ✗ 错误。一方面，每满五年一次的 $500 非现金长期服务奖与每年 $500 的非现金礼品额度互不占用，公平交易雇员的 $400 与 $450 均免税；另一方面，股东配偶属于关系人（non-arm's length），不适用 $500 免税政策，$300 必须全额计税。 / Wrong. On one hand, the $500 non-cash long-service award given every five years and the $500 annual non-cash gift limit do not use each other up, so the arm's length employee's $400 and $450 are both tax-free; on the other, the shareholder's spouse is a non-arm's length person to whom the $500 policy does not apply, so the $300 is fully taxable.

b. ✗ 错误。一般礼品奖（$500）与五年一次的长期服务奖（$500）两个额度互不占用，同一年可以各用一次。 / Wrong. The general gift limit ($500) and the five-year long-service award limit ($500) do not use each other up, and each may be used once in the same year.

c. ✗ 错误。漏掉了 CRA 礼品政策的核心排除条款（non-arm's length exclusion）：股东及其亲属（包括配偶）收到的任何礼品，从第一块钱起就是应税福利。 / Wrong. This misses the core exclusion in the CRA gift policy (non-arm's length exclusion): any gift received by a shareholder or his relatives (including a spouse) is a taxable benefit from the first dollar.

d. ✓ 正确。对公平交易雇员而言，每年 $500 非现金礼品额度与每满五年 $500 非现金长期服务奖额度互不占用，因此 $400 与 $450 均免税，但现金与准现金（$200）永远是应税福利；对股东配偶而言，非公平交易雇员（non-arm's length employee）被明文排除在 $500 政策之外，$300 全额计税。 / Correct. For an arm's length employee, the annual $500 non-cash gift limit and the $500 non-cash long-service award limit every five years do not use each other up, so the $400 and $450 are both tax-free, but cash and near-cash ($200) are always a taxable benefit; for the shareholder's spouse, a non-arm's length employee is expressly excluded from the $500 policy, so the $300 is fully taxable.

69 答案 d

a. ✗ 错误。两边都踩了坑：第一，季度汇款人（quarterly remitter）要求的完美合规记录（perfect compliance history）涵盖过去 12 个月的薪资扣缴、GST/HST 缴纳以及 T4 和 GST/HST 按时申报，GST/HST 迟报一次即丧失按季汇款资格；第二，联营公司（associated corporations）的 AMWA 必须合并计算（$4,000 + $23,000 = $27,000 ⩾ $25,000），Y 和 Z 都变成加速汇款人。 / Wrong. It falls into traps on both sides: first, the perfect compliance history required of a quarterly remitter covers the last 12 months of payroll remittances, GST/HST payments, and on-time filing of T4s and GST/HST returns, so one late GST/HST filing loses quarterly status; second, the AMWA of associated corporations must be combined ($4,000 + $23,000 = $27,000, at least $25,000), so both Y and Z become accelerated remitters.

b. ✗ 错误。混淆了未扣缴罚（failure to deduct penalty，一律 10%）与迟缴罚（late remittance penalty，阶梯罚：1–3 天 3%、4–5 天 5%、6–7 天 7%、超过 7 天 10%）。迟缴 5 天适用 5% 的阶梯罚率，而非 10%。 / Wrong. This confuses the failure to deduct penalty (always 10%) with the late remittance penalty (a tiered penalty: 3% for 1–3 days, 5% for 4–5 days, 7% for 6–7 days, 10% for more than 7 days). Five days late falls under the 5% tier, not 10%.

c. ✗ 错误。X 公司因 GST/HST 迟报已失去季度资格；而 Y 与 Z 合并后的 AMWA 为 $27,000，属于加速门槛一（$25,000–$99,999.99，每月两次），达到 $100,000 及以上才是加速门槛二（Threshold 2）。 / Wrong. Company X has already lost quarterly status because of its late GST/HST filing; and the combined AMWA of Y and Z is $27,000, which makes them Threshold 1 accelerated remitters ($25,000–$99,999.99, twice a month); Threshold 2 begins only at $100,000 or more.

d. ✓ 正确。季度汇款人除了要求前一年或前两年 AMWA 低于 $3,000 外，还要求过去 12 个月具备完美合规记录（包括薪资扣缴、GST/HST 缴纳以及 T4 与销售税按时申报），X 公司迟报 GST/HST 导致失去季度资格，只能按普通汇款人（次月 15 日）缴；同时联营公司的两年前 AMWA 必须合并计算，Y 与 Z 合计 $27,000 落入 $25,000–$99,999.99 区间，因此组内所有公司（含仅 $4,000 的 Y 公司）均成为加速门槛一（Threshold 1 accelerated remitter）汇款人。 / Correct. Besides requiring an AMWA below $3,000 in the previous one or two years, a quarterly remitter must have a perfect compliance history for the last 12 months (including payroll remittances, GST/HST payments and on-time filing of T4s and sales tax returns); Company X's late GST/HST filing loses it quarterly status and it can only remit as a regular remitter (by the 15th of the next month). Also, the AMWA of associated corporations from two years earlier must be combined, so Y and Z together at $27,000 fall in the $25,000–$99,999.99 band, and every company in the group (including Y with only $4,000) becomes a Threshold 1 accelerated remitter.

69′ 答案 a

a. ✓ 正确。扣了迟交适用四级阶梯迟缴罚（late remittance penalty）：迟交 1–3 天罚 3%、4–5 天罚 5%、6–7 天罚 7%、超过 7 天或未交罚 10%；在非明知或严重疏忽的一般情形下，只对超过 $500 的那一部分计罚。迟交 6 天对应 7%。 / Correct. Late remittance attracts the four-tier late remittance penalty: 3% for 1–3 days late, 5% for 4–5 days, 7% for 6–7 days, and 10% for more than 7 days or not remitted; in ordinary cases that are not knowing or grossly negligent, the penalty applies only to the part above $500. Six days late corresponds to 7%.

b. ✗ 错误。10% 是未扣缴罚（failure to deduct penalty）或迟缴超过 7 天 / 根本未交的最高档罚率，迟交 6 天适用 7%。 / Wrong. 10% is the failure to deduct penalty, or the top tier for remitting more than 7 days late or not at all; six days late attracts 7%.

c. ✗ 错误。3% 仅适用于迟交 1–3 天（或加速门槛二雇主按时缴但未经金融机构缴纳的情形），6–7 天为 7%。 / Wrong. 3% applies only to remittances 1–3 days late (or where a Threshold 2 accelerated employer pays on time but not through a financial institution); 6–7 days is 7%.

d. ✗ 错误。20% 罚率仅在同一日历年内第二次违规、且属于明知或严重疏忽（knowingly or under circumstances amounting to gross negligence）时才触发。 / Wrong. The 20% penalty is triggered only on a second violation in the same calendar year that is knowing or in circumstances amounting to gross negligence.

70 答案 c

a. ✗ 错误。第一，薪酬在 $1,000,000.01 至 $1,500,000 之间适用 5.85% 的缺口费率（notch rate），不是 1.95%；第二，联营雇主（associated employers）必须共享 $1,000,000 免税额，且合计薪酬一旦超过 $1,500,000，全组都没有免税额。 / Wrong. First, remuneration between $1,000,000.01 and $1,500,000 is subject to the 5.85% notch rate, not 1.95%; second, associated employers must share the $1,000,000 exemption, and once combined remuneration exceeds $1,500,000, the whole group has no exemption.

b. ✗ 错误。单家公司薪酬 $1,300,000 未超过 $1,500,000，仍享有 $1,000,000 免税额，按 5.85% × ($1,300,000 − $1,000,000) = $17,550 计算；而加上第二家公司的 $400,000 后，联营组合计薪酬达 $1,700,000（超过 $1,500,000），全组免税额归零，不能再共享 $1,000,000 免税额。 / Wrong. A single corporation with $1,300,000 does not exceed $1,500,000 and still has the $1,000,000 exemption, so tax is 5.85% x ($1,300,000 – $1,000,000) = $17,550; and with the second corporation's $400,000 added, the associated group's combined remuneration is $1,700,000 (above $1,500,000), the exemption of the whole group goes to zero and cannot be shared as a $1,000,000 exemption.

c. ✓ 正确。单家公司 BC 薪酬 $1,300,000 落在 $1,000,000.01–$1,500,000 区间，按缺口费率（notch rate）计算：5.85% × ($1,300,000 − $1,000,000) = $17,550；当与第二家公司联营时，联营组合计薪酬为 $1,300,000 + $400,000 = $1,700,000，超过 $1,500,000 门槛，根据 BC 雇主健康税（Employer Health Tax, EHT）规则，联营组全组都没有免税额，各自按全额薪酬的 1.95% 缴税。 / Correct. A single corporation's BC remuneration of $1,300,000 falls in the $1,000,000.01–$1,500,000 band and is computed at the notch rate: 5.85% x ($1,300,000 – $1,000,000) = $17,550; when associated with the second corporation, the group's combined remuneration is $1,300,000 + $400,000 = $1,700,000, above the $1,500,000 threshold, and under the BC Employer Health Tax (EHT) rules the whole associated group has no exemption, each paying 1.95% on its full remuneration.

d. ✗ 错误。这是「拆公司发薪避税」的常见误区：BC EHT 规定联营组合计薪酬超过 $1,500,000 的，全组都没有免税额，看的是联营组合计数而非单家公司是否超 $1,500,000。 / Wrong. This is the common misconception of 'splitting payroll across corporations to avoid tax': BC EHT provides that where the associated group's combined remuneration exceeds $1,500,000, the whole group has no exemption, looking at the group's combined total and not at whether a single corporation exceeds $1,500,000.

70′ 答案 a

a. ✓ 正确。5.85% 的缺口费率（notch rate）正是为了在 $1,000,000 至 $1,500,000 之间平滑收回 $1,000,000 的免税额：当薪酬达到 $1,500,000 时，按缺口费率算为 5.85% × ($1,500,000 − $1,000,000) = $29,250，按全额 1.95% 算也是 1.95% × $1,500,000 = $29,250，两段刚好平滑衔接，不会出现断崖跳升。 / Correct. The 5.85% notch rate exists to phase out the $1,000,000 exemption smoothly between $1,000,000 and $1,500,000: at $1,500,000 the notch rate gives 5.85% x ($1,500,000 – $1,000,000) = $29,250, and the full 1.95% also gives 1.95% x $1,500,000 = $29,250, so the two segments join exactly, with no cliff.

b. ✗ 错误。一旦薪酬超过 $1,500,000，$1,000,000 的免税额整块消失，1.95% 是乘以全额 BC 薪酬。 / Wrong. Once remuneration exceeds $1,500,000, the $1,000,000 exemption disappears entirely, and 1.95% is applied to the full BC remuneration.

c. ✗ 错误。慈善与非营利雇主的免税额是 $1,500,000、缺口费率是 2.925%；1.95% 是一般雇主超过 $1,500,000 后的全额税率。 / Wrong. The exemption for charitable and non-profit employers is $1,500,000 and their notch rate is 2.925%; 1.95% is the full-amount rate for a general employer above $1,500,000.

d. ✗ 错误。BC 雇主健康税按日历年 BC 薪酬计征，与联邦所得税和源头扣缴（CPP/EI）完全无关。 / Wrong. BC Employer Health Tax is assessed on BC remuneration for the calendar year and has nothing to do with federal income tax and source deductions (CPP/EI).

第 11 章答案与解析

71 答案 a

a. ✓ 非营利组织（non-profit organization, NPO）在 s.149(1)(l) 下无需向联邦或省级注册即可享受免税，但不能就捐款或会费开具税务抵扣收据；同时，作为居民公司，即使应纳税额为零，每个税年仍必须提交 T2 公司所得税申报表（T2 return）。 / A non-profit organization (NPO) under s.149(1)(l) need not register federally or provincially to be tax-exempt, but it cannot issue tax-deductible receipts for donations or membership fees; also, as a resident corporation, it must file a T2 corporation income tax return every tax year even if tax payable is zero.

b. ✗ 这混淆了非营利组织与注册慈善机构（registered charity）：只有按 s.149(1)(f) 免税的注册慈善机构才需要向 CRA 申请注册并获得开具捐赠收据的权力。 / This confuses a non-profit organization with a registered charity: only a registered charity exempt under s.149(1)(f) must apply to the CRA for registration and obtain the power to issue donation receipts.

c. ✗ 这掉进了「零税免报 T2 陷阱」：全年都是注册慈善机构的公司确实免报 T2，但作为公司的非营利组织并不在 T2 免报例外名单中，哪怕零税也必须每年报 T2 或 T2 简表（T2 Short Return）。 / This falls into the 'Skipping the T2 because there is no tax' trap: a corporation that is a registered charity throughout the year is indeed not required to file a T2, but a non-profit organization that is a corporation is not on the list of exceptions to T2 filing and must file a T2 or a T2 Short Return every year, even with zero tax.

d. ✗ s.149(1)(l) 看的是「组织并运营」（exclusively organized and operated）两个动词，是逐年的事实判断而非永久保证，且非营利组织对捐款和会费均不能开具税务抵扣收据。 / Section 149(1)(l) looks at the two verbs 'organized and operated' (exclusively organized and operated), which is a year-by-year factual test, not a permanent guarantee; and a non-profit organization cannot issue tax-deductible receipts for either donations or membership dues.

71′ 答案 c

a. ✗ 非营利组织（non-profit organization, NPO）既不能开具捐赠收据，也不能因为零税而免报 T2。 / A non-profit organization (NPO) can neither issue donation receipts nor skip the T2 just because tax is zero.

b. ✗ 注册慈善机构（registered charity）必须经 CRA 注册才能取得身份，且全年均为注册慈善机构的公司免报 T2。 / A registered charity must be registered with the CRA to obtain its status, and a corporation that is a registered charity throughout the year need not file a T2.

c. ✓ 注册慈善机构（registered charity）接受 CRA 注册审查后按 s.149(1)(f) 免税、可开具捐赠收据且免报 T2；而作为公司的非营利组织无需注册、不可开收据，但每个税年结束后 6 个月内仍必须申报 T2（或 T2 简表）。 / Correct. A registered charity, after CRA registration review, is exempt under s.149(1)(f), can issue donation receipts and need not file a T2; an incorporated non-profit organization need not register and cannot issue receipts, but must still file a T2 (or T2 Short Return) within 6 months after the end of each tax year.

d. ✗ 把两者的待遇完全颠倒了：注册慈善机构既免报 T2 也免报 Form T1044，而非营利公司必须报 T2 且满足 s.149(12) 条件时还要报 T1044。 / This reverses the treatment of the two completely: a registered charity is exempt from both the T2 and Form T1044, whereas a non-profit corporation must file a T2 and must also file a T1044 when the s.149(12) conditions are met.

72 答案 b

a. ✗ s.149(12) 的被动收入门槛看的是应税股息、利息、租金、特许权使用费四项的「合计」(total)，而不是单看某一项是否超过 $10,000。 / The passive income threshold in s.149(12) looks at the 'total' of the four items of taxable dividends, interest, rent and royalties, not at whether any single item exceeds $10,000.

b. ✓ 在判定非营利组织信息申报表（Form T1044）的条件一时，应将本期收到或应收的应税股息、利息、租金、特许权使用费四项加总（会费与拨款不计入）；本例中租金 $7,000 加利息 $3,500 合计已超过 $10,000 门槛，因此必须在会计期结束后 6 个月内申报 T1044。 / Correct. In deciding condition one for the non-profit organization information return (Form T1044), add up the four items of taxable dividends, interest, rent and royalties received or receivable in the period (membership fees and grants are not counted); here rent of $7,000 plus interest of $3,500 already exceeds the $10,000 threshold, so a T1044 must be filed within 6 months after the end of the fiscal period.

c. ✗ 这掉进了「T1044 收入混算陷阱」：会费、募捐、政府拨款和活动收入根本不计入 s.149(12) 的 $10,000 被动收入测试，且 $200,000 是上一期末总资产门槛而非收入门槛。 / This falls into the 'T1044 income mixing' trap: membership fees, fundraising, government grants and event income are not counted in the s.149(12) $10,000 passive income test at all, and $200,000 is the threshold for total assets at the end of the prior period, not an income threshold.

d. ✗ s.149(12) 的三条触发条件是「或」而不是「且」；即便资产未超 $200,000，只要四项被动收入合计超过 $10,000，就必须提交 Form T1044。 / The three triggers in s.149(12) are 'or', not 'and'; even if assets do not exceed $200,000, Form T1044 must be filed if the four passive items total more than $10,000.

72′ 答案 d

a. ✗ 会费与活动收入（$340,000）不计入 $10,000 被动收入测试；只算利息 $3,000 与租金 $3,500 时未超过 $10,000，无需报 Form T1044。 / Membership fees and event income ($340,000) are not counted in the $10,000 passive income test; counting only interest of $3,000 and rent of $3,500, the total does not exceed $10,000, so Form T1044 is not required.

b. ✗ 虽然未触发 Form T1044，但它是居民公司（incorporated association），哪怕免税零税额也必须每年提交 T2。 / Although Form T1044 is not triggered, it is a resident corporation (an incorporated association) and must file a T2 every year even if it is exempt and has zero tax.

c. ✗ 条件二看的是上一期末总资产是否超过 $200,000（本例上一期末仅 $150,000），故无需报 T1044；但作为公司仍须报 T2。 / Condition two looks at whether total assets at the end of the prior period exceeded $200,000 (here only $150,000 at the end of the prior period), so no T1044 is needed; but as a corporation it must still file a T2.

d. ✓ 会费与活动收入不计入被动收入测试（passive income threshold），利息 $3,000 与租金 $3,500 合计未超 $10,000，上一期末总资产 $150,000 未超 $200,000，且从未报过 T1044，故不报 Form T1044；但作为居民公司仍须按期申报 T2 或 T2 简表。 / Correct. Membership fees and event income are not counted in the passive income threshold; interest of $3,000 and rent of $3,500 total less than $10,000, total assets at the end of the prior period of $150,000 do not exceed $200,000, and a T1044 was never filed, so no Form T1044 is required; but as a resident corporation it must still file a T2 or a T2 Short Return on time.

73 答案 c

a. ✗ 这同时违背了条件二（2026 年看的是 2025 年末资产 $480,000）与条件三棘轮规则（ratchet rule，报过一次就永久要报）。 / This violates both condition two (for 2026 the test looks at the 2025 year-end assets of $480,000) and the condition three ratchet rule (once filed, always required).

b. ✗ 这掉进了「棘轮可逆陷阱」：虽然 2026 年末资产降到了 $150,000，但条件三规定只要以前任何一个会计期曾有申报义务，2027 年及以后每年仍必须继续报。 / This falls into the 'Assuming the ratchet can be reversed' trap: although 2026 year-end assets fell to $150,000, condition three provides that as long as a filing obligation existed in any earlier fiscal period, filing must continue every year in 2027 and after.

c. ✓ 根据 s.149(12)，2026 年不仅上一期末（2025 年末）资产 $480,000 超过 $200,000，而且 2025 年已经报过非营利组织信息申报表（Form T1044）；根据只进不出的棘轮规则（ratchet rule），2026 年、2027 年及此后每一个会计期都必须继续申报，不论金额降到多少。 / Correct. Under s.149(12), for 2026 not only did the prior period-end (2025 year-end) assets of $480,000 exceed $200,000, but the non-profit organization information return (Form T1044) was also already filed for 2025; under the one-way ratchet rule, filing must continue for 2026, 2027 and every later fiscal period, however far the amounts fall.

d. ✗ 多数住宅共管公寓管理公司（condominium corporation）落入 s.149(1)(l) 并受 s.149(12) 管辖；s.149(1)(i) 免报例外仅针对专为向长者提供低成本住房而运营的公司。 / Most residential condominium management corporations fall under s.149(1)(l) and are governed by s.149(12); the s.149(1)(i) exception applies only to corporations operated solely to provide low-cost housing for the aged.

73′ 答案 b

a. ✗ 注册慈善机构（registered charity）属于 s.149(12) 明确列出的免报 T1044 例外。 / A registered charity is one of the exceptions expressly listed in s.149(12) from filing Form T1044.

b. ✓ 住宅共管公寓管理公司（condominium corporation）通常按 s.149(1)(l) 免税，当其上一会计期末总资产（$350,000）超过 $200,000 时，必须按 s.149(12) 提交 Form T1044。 / Correct. A residential condominium management corporation is usually exempt under s.149(1)(l), and when its total assets at the end of the prior fiscal period ($350,000) exceed $200,000, it must file Form T1044 under s.149(12).

c. ✗ 仅为向长者提供低成本住房而运营、按 s.149(1)(i) 免税的公司属于 T4117 指南列明的免报 T1044 例外。 / A corporation exempt under s.149(1)(i) and operated solely to provide low-cost housing for the aged is an exception from filing T1044 listed in Guide T4117.

d. ✗ 注册加拿大业余体育协会（registered Canadian amateur athletic association）与注册全国艺术服务组织同样免于提交 Form T1044。 / A registered Canadian amateur athletic association is exempt from filing Form T1044, as is a registered national arts service organization.

74 答案 c

a. ✗ 这掉进了「会所全部免税陷阱」：主要目的为提供餐饮、娱乐或体育设施的俱乐部会触发 s.149(5) 视同生前信托（deemed inter vivos trust），投资收益与闲置土地资本利得必须报 T3 纳税。 / This falls into the 'club entirely exempt' trap: a club whose main purpose is to provide dining, recreational or sporting facilities triggers the s.149(5) deemed inter vivos trust, and investment income and gains on idle land must be reported and taxed on a T3.

b. ✗ 这掉进了「会所全部课税陷阱」：s.149(5) 并未取消会费与餐饮收入在 s.149(1)(l) 下的免税待遇，而是将财产视同由生前信托持有、仅就财产收入及非服务用财产的资本利得在 T3 上课税。 / This falls into the 'club entirely taxed' trap: s.149(5) does not remove the tax exemption of membership fees and dining income under s.149(1)(l); instead it treats the property as held by an inter vivos trust and taxes on a T3 only the property income and the capital gains on property not used for services.

c. ✓ 根据 s.149(5)，主要目的为会员提供餐饮、娱乐或体育设施的会所，其财产视同由生前信托（deemed inter vivos trust）持有：会费与餐饮收入继续免税，但 $58,000 财产收入及未用于提供该类服务的闲置土地应税资本利得须报 T3 课税；同时因其是公司且被动收入超 $10,000，一年须交齐 T2、T1044 与 T3 三份表。 / Correct. Under s.149(5), a club whose main purpose is to provide dining, recreational or sporting facilities to its members is deemed to hold its property in an inter vivos trust: membership fees and dining income stay exempt, but the $58,000 of property income and the taxable capital gain on idle land not used to provide such services must be reported and taxed on a T3; also, because it is a corporation and its passive income exceeds $10,000, it must file all three returns, the T2, T1044 and T3, in the year.

d. ✗ s.149(5) 明确规定，处置未用于提供餐饮、娱乐或体育设施的财产所产生的应税资本利得同样落在视同生前信托中课税。 / Section 149(5) expressly provides that taxable capital gains from disposing of property not used to provide dining, recreational or sporting facilities are also taxed in the deemed inter vivos trust.

74′ 答案 a

a. ✓ 在 s.149(5) 视同生前信托（deemed inter vivos trust）规则下，只有「未用于提供餐饮、娱乐或体育设施服务」的财产在处置时产生的应税资本利得才课税；一直用作会员服务停车场的土地属于提供服务所需，其资本利得不在视同信托课税范围内，故仅 $58,000 财产收入需在 T3 上纳税。 / Correct. Under the s.149(5) deemed inter vivos trust rule, only the taxable capital gain on disposing of property 'not used to provide dining, recreational or sporting services' is taxed; land used throughout as the members' services parking lot is needed to provide the services, so its capital gain is outside the deemed trust's taxable range, and only the $58,000 of property income is taxed on a T3.

b. ✗ 判据是该块财产有没有用于提供餐饮、娱乐或体育服务，而不是凡属不动产一律课税。 / The test is whether the property was used to provide dining, recreational or sporting services, not that all real property is taxed.

c. ✗ 正好说反了：视同生前信托下的财产收入（利息与股息 $58,000）必须课税，而用于提供服务的停车场土地资本利得免税。 / This is exactly backwards: property income in the deemed inter vivos trust (interest and dividends of $58,000) must be taxed, whereas the capital gain on the parking lot land used to provide services is exempt.

d. ✗ s.149(5) 的判据是组织的「主要目的」（main purpose），而不是名字；叫「文化协会」但主要经营会员餐厅与球场的组织同样触发视同信托。 / The test in s.149(5) is the organization's 'main purpose', not its name; an organization called a 'cultural association' that mainly runs a members' restaurant and golf course also triggers the deemed trust.

75 答案 d

a. ✗ T2 并非按每日 $25 计罚，且对于按天计罚的 Form T1044，绝不能先等 CRA 答复再交表，否则等待期间罚款会继续按天累积到 $2,500 上限。 / The T2 is not penalized at $25 a day, and for a T1044, which is penalized by the day, one must never wait for the CRA's reply before filing, or the penalty keeps accumulating daily up to the $2,500 cap while waiting.

b. ✗ 只有 T2 的 s.162(1) 迟报罚以期限时未付税款为基数；Form T1044 的迟报罚是按每日 $25 计算的定额罚，与是否欠税无关。 / Only the T2 s.162(1) late-filing penalty uses the tax unpaid at the deadline as its base; the late penalty on Form T1044 is a fixed amount calculated at $25 a day and has nothing to do with whether tax is owing.

c. ✗ 10% 加每整月 2%（最多 20 个月）是 s.162(2) 下 T2 重犯时针对「未付税款」的比例，不是按总资产计算；且 $100 只是 T1044 迟报罚的最低下限而非固定金额。 / 10% plus 2% for each full month (up to 20 months) is the proportion under s.162(2) for a repeat T2 offence, applied to 'unpaid tax', not to total assets; and $100 is only the minimum floor of the T1044 penalty, not a fixed amount.

d. ✓ T2 迟报按 s.162(1) 以期限时未付的税为基数（5%＋每整月 1%，最多 12 个月），真正零税的免税公司算出来是 $0（但若日后被追溯否定免税身份则会从原始期限起算）；而 Form T1044 按每日 $25 基本罚（basic penalty $25 per day，最低 $100、最高 $2,500）计罚，正确实务是先把表交上去止住计天，同时随表附信援引纳税人纾困条款（taxpayer relief provisions）申请豁免。 / Correct. A late T2 is penalized under s.162(1) on the tax unpaid at the deadline (5% plus 1% for each full month, up to 12 months), so a truly zero-tax exempt corporation computes $0 (but if its exempt status is later denied retroactively, the penalty runs from the original deadline); Form T1044 carries a basic penalty of $25 a day (minimum $100, maximum $2,500); the correct practice is to file the form first to stop the daily count and at the same time attach a letter invoking the taxpayer relief provisions to request a waiver.

75′ 答案 b

a. ✗ 免税身份是逐年的事实判断，CRA 可以在正常复评期内追溯认定该年度不免税，而非仅对未来年度生效。 / Exempt status is a year-by-year factual determination, and the CRA may retroactively deny exemption for that year within the normal reassessment period; it does not apply only to future years.

b. ✓ 一旦事实判断显示组织为盈利运营或收入可供成员个人受益，CRA 可在正常复评期内追溯否定该年免税身份，全部所得按普通公司税率课税并加收按规定利率（prescribed rate）逐日复利的利息；此时期限时未付的税不再为零，s.162(1) 的 T2 迟报罚（5%＋每整月 1%，最多 12 个月）便有了计罚基数并从原始期限起算。 / Correct. Once the facts show that the organization was run for profit or that its income was available for the personal benefit of members, the CRA may retroactively deny exempt status for that year within the normal reassessment period, taxing all income at ordinary corporate rates and adding interest compounded daily at the prescribed rate; the tax unpaid at the deadline is then no longer zero, so the s.162(1) late T2 penalty (5% plus 1% per full month, up to 12 months) has a base and runs from the original deadline.

c. ✗ $2,500 只是迟报 T1044 信息表的罚款封顶，绝不能替代丧失免税身份后应补缴的企业所得税、利息及 T2 迟报罚。 / $2,500 is only the cap of the penalty for filing the T1044 information return late; it can never replace the corporate income tax, interest and late T2 penalty owing after exempt status is lost.

d. ✗ s.149(1)(l) 要求「专为……组织并运营」（exclusively organized and operated），章程写得再漂亮，实际运营偏离非营利目的同样会丧失当年免税身份。 / Section 149(1)(l) requires being 'exclusively organized and operated' for the purpose; however well the articles are written, actual operation that departs from the non-profit purpose also loses exempt status for that year.

76 答案 a

a. ✓ 在 BC 雇主健康税（Employer Health Tax, EHT）下，非营利雇主的每个排他使用的合格地点（qualifying location）各享一份 $1,500,000 免税额，两处独立办公楼各发薪 $1,300,000 均未超限，应缴为 $0；若同一法人的两个内部部门在同一栋楼的不同楼层，则合算为一个合格地点，仅享一份 $1,500,000 免税额，落在 $1,500,000.01–$4,500,000 缺口区间（notch rate amount），按 2.925% × ($2,600,000 − $1,500,000) = $32,175 计税。 / Under BC Employer Health Tax (EHT), a non-profit employer gets a $1,500,000 exemption for each qualifying location it uses exclusively; two separate office buildings each paying $1,300,000 do not exceed the limit, so tax is $0; if two internal departments of the same legal entity are on different floors of the same building, they count as one qualifying location with a single $1,500,000 exemption, falling in the $1,500,000.01–$4,500,000 notch rate band, taxed at 2.925% x ($2,600,000 – $1,500,000) = $32,175.

b. ✗ $50,700（1.95% × $2,600,000）是一般雇主超过 $1,500,000 时的算法；非营利雇主不仅按每个合格地点各享 $1,500,000 免税额，而且单地点要超过 $4,500,000 才按全额计税。 / $50,700 (1.95% x $2,600,000) is the method for a general employer above $1,500,000; a non-profit employer not only gets a $1,500,000 exemption for each qualifying location, but a single location must exceed $4,500,000 before the full amount is taxed.

c. ✗ 这掉进了「BC 雇主健康税单限额陷阱」：与联邦所得税一个纳税人一份限额不同，BC 非营利雇主在省内有多个排他使用的合格地点时，每个合格地点各享一份 $1,500,000 免税额。 / This falls into the 'one BC Employer Health Tax exemption per entity' trap: unlike federal income tax, where a taxpayer gets one limit, a BC non-profit employer with several exclusively used qualifying locations in the province gets a $1,500,000 exemption for each qualifying location.

d. ✗ 根据 BC 省财政厅口径，同一法人在同一栋楼里的各个内部部门只算一个合格地点（qualifying location），只能合用一份 $1,500,000 免税额。 / According to the BC Ministry of Finance, the internal departments of the same legal entity in the same building count as only one qualifying location and can share only one $1,500,000 exemption.

76′ 答案 b

a. ✗ 非营利雇主的免税额提高到了 $1,500,000（而非 $1,000,000），且其缺口费率是 2.925%（即 5.85% 的一半），不是 1.95%。 / The exemption of a non-profit employer is raised to $1,500,000 (not $1,000,000), and its notch rate is 2.925% (half of 5.85%), not 1.95%.

b. ✓ BC 给慈善与非营利雇主的三重优待（Employer Health Tax, EHT）包括：每个合格地点免税额从 $1,000,000 提至 $1,500,000；缺口区间拉长至 $1,500,000.01–$4,500,000 且缺口费率减半为 2.925%（一般雇主为 5.85%）；与非营利雇主联营的其他雇主无需与它共享免税额。 / Correct. BC's three preferential treatments of charitable and non-profit employers (Employer Health Tax, EHT) are: the exemption for each qualifying location is raised from $1,000,000 to $1,500,000; the notch band is extended to $1,500,000.01–$4,500,000 and the notch rate is halved to 2.925% (5.85% for general employers); and other employers associated with the non-profit employer need not share the exemption with it.

c. ✗ 非营利雇主并非无上限免征 BC EHT：单合格地点薪酬在 $1,500,000.01–$4,500,000 之间按 2.925% 计征，超过 $4,500,000 则按全额计税。 / A non-profit employer is not exempt from BC EHT without limit: payroll of a single qualifying location between $1,500,000.01 and $4,500,000 is taxed at 2.925%, and above $4,500,000 the full amount is taxed.

d. ✗ $4,500,000 是缺口区间（notch rate amount）的上限而非免税额，且联营雇主不必与非营利雇主共享免税额。 / $4,500,000 is the upper limit of the notch rate band, not an exemption, and associated employers need not share the exemption with a non-profit employer.

77 答案 b

a. ✗ 两项口径均错误：资产门槛看的是「上一会计期末」按公认会计原则计算的「账面价值」（而非本期公允价值），被动收入包含「收到或应收」（而非仅实收现金）。 / Both bases are wrong: the asset threshold looks at the 'book value' as at the end of the 'prior fiscal period' under generally accepted accounting principles (not the fair value of the current period), and passive income includes amounts 'received or receivable' (not only cash actually received).

b. ✓ 根据 s.149(12) 及 T4117 指南，资产门槛看的是上一会计期末按公认会计原则确定的账面价值（book value under GAAP）是否超过 $200,000；被动收入门槛看的是本会计期内收到或应收（received or receivable，即权责发生制应收也算）的应税股息、利息、租金、特许权使用费四项合计是否超过 $10,000。 / Under s.149(12) and Guide T4117, the asset threshold looks at whether the book value under generally accepted accounting principles (GAAP) at the end of the prior fiscal period exceeds $200,000; the passive income threshold looks at whether the total of the four items of taxable dividends, interest, rents and royalties received or receivable in the current fiscal period (that is, accrual receivables also count) exceeds $10,000.

c. ✗ 资产看的是全部总资产的 GAAP 账面价值而非仅不动产评估重置价值，且会费等非被动收入不计入 $10,000 门槛。 / The asset test uses the GAAP book value of total assets, not just the appraised replacement value of real estate, and membership fees and other non-passive income are not counted in the $10,000 threshold.

d. ✗ 法条看的是上一会计期末时点的总资产账面价值以及本期收到或应收的四项被动收入总额，不采用月均余额或扣减管理费后的净额。 / The statute looks at the book value of total assets at the end of the prior fiscal period and the total of the four passive income items received or receivable in the current period; they do not use average monthly balances or the net after deducting management fees.

77′ 答案 c

a. ✗ 非营利组织（non-profit organization, NPO）本来就不需要向 CRA 注册，也没有非营利注册号需要每年续期。 / A non-profit organization (NPO) does not need to register with the CRA in the first place, so there is no non-profit registration number to renew every year.

b. ✗ s.149(12) 的 $10,000 与 $200,000 门槛自 1993 年以来从未调整，没有指数化机制。 / The $10,000 and $200,000 thresholds in s.149(12) have not been adjusted since 1993 and there is no indexation mechanism.

c. ✓ s.149(1)(l) 要求组织「专为」非营利目的「组织并运营」（exclusively organized and operated），这是逐年的事实判定而非一次性证书；每个会计期结束时都须自检章程目的、实际经营是否偏离、是否有任何形式让成员个人受益（personal benefit of any member）以及是否仍非慈善机构。 / Correct. Section 149(1)(l) requires the organization to be 'exclusively organized and operated' for a non-profit purpose, which is a year-by-year factual determination and not a one-time certificate; at the end of each fiscal period it must self-check its constating purpose, whether actual operation has departed from it, whether there is any form of personal benefit to any member and whether it is still not a charity.

d. ✗ 6 个月是申报期限，公司的会计期最长可达 53 周、其他主体最长 12 个月；只有主要目的为提供餐饮、娱乐或体育设施的会所才会触发 s.149(5) 视同生前信托。 / 6 months is the filing deadline; a corporation's fiscal period can be up to 53 weeks and for other entities up to 12 months; only a club whose main purpose is to provide dining, recreational or sporting facilities triggers the s.149(5) deemed inter vivos trust.

第 12 章答案与解析

78 答案 b

a. ✗ 落入「慈善捐赠在 Schedule 1 漏加回」陷阱：算税务净收入（net income for tax purposes）时忘记把账上已扣的 $5,000 慈善捐赠加回（少加回 $5,000 得出 $230,500），随后在算应税收入（taxable income）时又扣了一次 $5,000 得出 $225,500，等于把同一笔捐赠扣了两次。 / Falls into the trap 'Missing the add-back of a charitable donation on Schedule 1': in computing net income for tax purposes, it forgets to add back the $5,000 charitable donation already deducted in the books (adding back $5,000 too little gives $230,500), and then deducts the $5,000 again in computing taxable income to get $225,500, which deducts the same donation twice.

b. ✓ 正确。从 Schedule 1 金额 A（$180,000）出发，加回账面折旧 $42,000（s.18(1)(b)）、餐饮娱乐费的一半 $8,000（s.67.1）、高尔夫俱乐部会费全额 $9,500（s.18(1)(l)）、坏账准备增加额 $8,000（s.18(1)(e)）、慈善捐赠 $5,000 及账面所得税费用 $38,000（加项合计 $110,500），再减去 Schedule 8 资本成本折让（capital cost allowance, CCA）$55,000，得出税务净收入（net income for tax purposes）= $180,000 + $110,500 − $55,000 = $235,500；最后在 T2 主表从税务净收入中扣除慈善捐赠 $5,000，得到应税收入（taxable income）$230,500。 / Correct. Start from Schedule 1 Amount A ($180,000) and add back book depreciation of $42,000 (s.18(1)(b)), half of the meals and entertainment of $8,000 (s.67.1), the full golf club dues of $9,500 (s.18(1)(l)), the increase in the bad debt reserve of $8,000 (s.18(1)(e)), the charitable donation of $5,000 and the book income tax expense of $38,000 (additions total $110,500), then subtract the Schedule 8 capital cost allowance (CCA) of $55,000, giving net income for tax purposes = $180,000 + $110,500 − $55,000 = $235,500; finally, on the main T2 form deduct the charitable donation of $5,000 from net income for tax purposes to get taxable income of $230,500.

c. ✗ 落入「俱乐部会费误按餐饮娱乐扣 50%」陷阱：把 $9,500 的高尔夫俱乐部会费只加回了一半（少加回 $4,750），忽略了 s.18(1)(l) 下高尔夫与康乐俱乐部会费是 100% 完全不扣。 / Falls into the trap 'Deducting only 50% of club dues as meals and entertainment': the $9,500 of golf club dues was added back only by half (adding back $4,750 too little), ignoring that dues for golf and recreational clubs are 100% non-deductible under s.18(1)(l).

d. ✗ 漏加回了账面所得税费用 $38,000（$235,500 − $38,000 = $197,500）：由于 GIFI 代码 9999 是计入所得税后的净利润，公司所得税本身在税法上不可扣除，必须在 Schedule 1 上全额加回。 / It misses the add-back of the book income tax expense of $38,000 ($235,500 − $38,000 = $197,500): because GIFI code 9999 is net income after income tax, corporate income tax itself is not deductible under tax law and must be added back in full on Schedule 1.

78′ 答案 c

a. ✗ 落入「慈善捐赠在 Schedule 1 漏加回」陷阱：漏掉了 $5,000 慈善捐赠加回项（$110,500 − $5,000 = $105,500），忘记慈善捐赠必须在 Schedule 1 先加回、到计算应税收入时再扣。 / Falls into the trap 'Missing the add-back of a charitable donation on Schedule 1': it leaves out the $5,000 charitable donation add-back ($110,500 − $5,000 = $105,500), forgetting that a donation must first be added back on Schedule 1 and deducted only when computing taxable income.

b. ✗ 落入「俱乐部会费误按餐饮娱乐扣 50%」陷阱：将 $9,500 的游艇及高尔夫俱乐部会费按 50% 加回（少加回 $4,750），违反了 s.18(1)(l) 全额不准扣除的规定。 / Falls into the trap 'Deducting only 50% of club dues as meals and entertainment': the $9,500 of yacht and golf club dues was added back at 50% (adding back $4,750 too little), contrary to s.18(1)(l), under which none of it may be deducted.

c. ✓ 正确。Schedule 1 加回项包括：账面摊销 $42,000 + 餐饮娱乐费 50%（$8,000）+ 游艇与高尔夫俱乐部会费 100%（$9,500）+ 坏账准备增加额 $8,000 + 慈善捐赠 $5,000 + 账面所得税费用 $38,000 = $110,500；税务净收入（net income for tax purposes）= $180,000 + $110,500 − $55,000（CCA）= $235,500。 / Correct. The Schedule 1 add-backs are: book amortization of $42,000 + 50% of meals and entertainment ($8,000) + 100% of yacht and golf club dues ($9,500) + the increase in the bad debt reserve of $8,000 + the charitable donation of $5,000 + the book income tax expense of $38,000 = $110,500; net income for tax purposes = $180,000 + $110,500 − $55,000 (CCA) = $235,500.

d. ✗ 把 $16,000 客户餐饮娱乐费 100% 全额加回了（多加回 $8,000）：合理餐饮娱乐费在 s.67.1(1) 下可扣 50%，只需加回一半即 $8,000（餐饮娱乐全额加回误区）。 / It added back the $16,000 of client meals and entertainment in full at 100% (adding back $8,000 too much): reasonable meals and entertainment are 50% deductible under s.67.1(1), so only half, $8,000, is added back (the full add-back of meals and entertainment misconception).

79 答案 a

a. ✓ 正确。财务信息通用索引（General Index of Financial Information, GIFI）严禁只报小计与合计（财报上有 40 项就要有 40 个代码），且所有校验必填项（validity check items：2599 总资产、3499 总负债、3620 股东权益或 3575 合伙人资本、8299 总收入、9368 总费用、9999 净利润，有农业活动时另加 9659/9898）即使金额为零也必须填 0，否则无法通过电子校验。 / Correct. The General Index of Financial Information (GIFI) strictly forbids reporting only subtotals and totals (40 items on the financial statements require 40 codes), and all validity check items (2599 total assets, 3499 total liabilities, 3620 shareholders' equity or 3575 partners' capital, 8299 total revenue, 9368 total expenses and 9999 net income, plus 9659/9898 where there is farming activity) must be entered as 0 even when the amount is zero, or the return cannot pass electronic validation.

b. ✗ 把一般规则和唯一例外彻底说反了：使用 GIFI 时不再随申报表提交传统财务报表，只有从事承保业务的保险公司（人寿、存款、财产与意外）因 GIFI 无保险业专用项目才仍须附交传统财报（例外颠倒陷阱）。 / This reverses the general rule and the only exception: when GIFI is used, traditional financial statements are no longer filed with the return; only insurance companies involved in underwriting (life, deposit, property and casualty) must still attach traditional statements because GIFI has no insurance-specific items (the reversed-exception trap).

c. ✗ 错在两个条件：第一，纸质简表 T1178（GIFI-Short）只适用于「不使用软件」的公司；第二，必须总收入与总资产「各自」低于一百万（$1,000,000），而不是二选一（简表门槛混淆陷阱）。 / It is wrong on two conditions: first, the paper short form T1178 (GIFI-Short) applies only to corporations that 'do not use software'; second, gross revenue and total assets must 'each' be under $1,000,000, not one or the other (the short-form threshold confusion trap).

d. ✗ 落入「GIFI 必填代码留空、只报小计」陷阱：找不到完全匹配的科目时，应使用该区块开头的通用项（generic item，代表同类兜底而非合计），且必填代码为零时必须填 0 而不能留空。 / Falls into the trap 'Leaving GIFI mandatory codes blank, or reporting only subtotals': when no item exactly matches, the generic item at the start of the block (which stands for a catch-all of the same kind, not a total) should be used, and a mandatory code with a zero amount must be entered as 0 and not left blank.

79′ 答案 d

a. ✗ 总收入与总资产各自低于一百万并不是豁免 GIFI，而是允许不用软件的公司改用纸质 GIFI 简表（Form T1178）（简表误当豁免陷阱）。 / Revenue and assets each under $1,000,000 is not an exemption from GIFI; it only allows a corporation that does not use software to use the paper GIFI short form (Form T1178) (the short form mistaken for an exemption trap).

b. ✗ 新公司首年必须另附 Schedule 101（期初资产负债表信息），且 GIFI 严禁只报几个小计或合计代码（漏报首年附表与只报小计陷阱）。 / A new corporation must attach Schedule 101 (opening balance sheet information) in its first year, and GIFI strictly forbids reporting only a few subtotal or total codes (the trap of missing the first-year schedule and reporting subtotals only).

c. ✗ Schedule 141（附加信息）对所有申报公司适用，专门询问谁主要经手财务信息、有无会计执业资格、是否与公司关联及有无保留意见，内部无执业资格人员编表同样必须如实填报（误以为无审计免填表 141 陷阱）。 / Schedule 141 (additional information) applies to all filing corporations and asks who mainly handled the financial information, whether that person holds an accounting designation, whether the person is related to the corporation and whether there was a reservation; statements prepared internally by someone without a designation must be reported truthfully as well (the trap of thinking no audit means no Schedule 141).

d. ✓ 正确。不用软件且总收入与总资产各自低于 $1,000,000 的公司可改用纸质简表 Form T1178（GIFI-Short）；新公司首年须另附 Schedule 101 期初资产负债表；且所有校验必填代码（validity check items）金额为零时也必须填 0。 / Correct. A corporation that does not use software and has gross revenue and total assets each under $1,000,000 may use the paper short form Form T1178 (GIFI-Short); a new corporation must attach Schedule 101 for the opening balance sheet in its first year; and all validity check codes with a zero amount must be entered as 0.

80 答案 c

a. ✗ 错在后两项：符合条件的临时工地营地餐食可 100% 全额扣除，而康乐或餐饮俱乐部会费在 s.18(1)(l) 下是 0% 可扣（100% 加回）（俱乐部会费误按餐饮娱乐扣 50% 陷阱）。 / The last two items are wrong: meals at a qualifying temporary work site camp are 100% deductible, and dues for recreational or dining clubs are 0% deductible under s.18(1)(l) (100% added back) (the trap of deducting club dues at 50% as meals and entertainment).

b. ✗ 把长途货运司机合格出差餐费（80% 可扣）与临时工地营地餐食（100% 可扣）的比例颠倒了（特例比例互换陷阱）。 / It reverses the percentages for the qualifying travel meals of long-haul truck drivers (80% deductible) and meals at a temporary work site camp (100% deductible) (the swapped special rates trap).

c. ✓ 正确。根据 s.67.1(1)，普通餐饮与娱乐费（meals and entertainment）按实际支出与合理金额取小者的 50% 扣除（加回 50%）；长途货运司机在合格出差期间的餐费按 80% 扣除（加回 20%）；符合条件的临时工地营地餐食可 100% 全额扣除（无需加回）；而以提供餐饮、康乐或体育设施为主要目的的俱乐部会费（club dues，含入会费）在 s.18(1)(l) 下完全不扣（0% 可扣，100% 加回）。 / Correct. Under s.67.1(1), ordinary meals and entertainment are deducted at 50% of the lesser of the actual expense and a reasonable amount (50% added back); qualifying travel meals of long-haul truck drivers are deducted at 80% (20% added back); meals at a qualifying temporary work site camp are 100% deductible (no add-back); and dues (including initiation fees) for a club whose main purpose is to provide dining, recreational or sporting facilities are completely non-deductible under s.18(1)(l) (0% deductible, 100% added back).

d. ✗ 全盘压低了法定可扣比例：普通合理餐饮娱乐费可扣 50% 而非 0%，长途货运司机出差餐费可扣 80%，临时工地营地餐食可扣 100%（比例整体错位陷阱）。 / It lowers all the statutory deductible percentages across the board: reasonable ordinary meals and entertainment are 50% deductible, not 0%, long-haul truck driver travel meals are 80% deductible, and meals at a temporary work site camp are 100% deductible (the shifted percentages trap).

80′ 答案 a

a. ✓ 正确。注意题干问的是「加回比例（added back）」：长途货运司机合格出差餐费可扣 80%，因此 Schedule 1 加回 20%；旅舍与高尔夫设施使用维护费（lodge and golf facility fees）在 s.18(1)(l) 下完全不扣，因此加回 100%；符合条件的临时工地营地餐食可 100% 全额扣除，因此加回 0%。 / Correct. Note that the question asks for the 'added back' percentage: qualifying travel meals of long-haul truck drivers are 80% deductible, so 20% is added back on Schedule 1; lodge and golf facility fees are completely non-deductible under s.18(1)(l), so 100% is added back; meals at a qualifying temporary work site camp are 100% deductible, so 0% is added back.

b. ✗ 同时踩中两个坑：一是把长途货运司机可扣的 80% 当成了加回比例（应加回 20%），二是把 s.18(1)(l) 下 100% 不可扣的旅舍与高尔夫费用以及 100% 可扣的工地营地餐食都按 50% 处理（可扣与加回方向搞反＋俱乐部会费扣半陷阱）。 / It steps into two pits: first, it treats the 80% deductible for long-haul truck drivers as the add-back percentage (it should be 20% added back); second, it treats lodge and golf fees, which are 100% non-deductible under s.18(1)(l), and work site camp meals, which are 100% deductible, both at 50% (reversed deduction and add-back directions, plus the trap of deducting club dues at half).

c. ✗ 忽略了 s.67.1 下的两项法定特例：长途货运司机合格出差餐费只需加回 20%（可扣 80%），临时工地营地合格餐食加回 0%（可扣 100%），均不按普通餐饮的 50% 加回（忽略法定特例陷阱）。 / It ignores the two statutory special cases under s.67.1: qualifying travel meals of long-haul truck drivers need only 20% added back (80% deductible), and qualifying temporary work site camp meals have 0% added back (100% deductible), neither being added back at the 50% for ordinary meals (the ignored statutory exception trap).

d. ✗ 落入「俱乐部会费误按餐饮娱乐扣 50%」陷阱，且把 100% 可扣的临时工地营地餐食误当成 100% 加回。 / Falls into the trap 'Deducting only 50% of club dues as meals and entertainment', and wrongly treats the work site camp meals, which are 100% deductible, as 100% added back.

81 答案 b

a. ✗ 落入「误用旧版 AII 日期」陷阱：考试旧口径里的 2018 版加速投资激励（AII，50% 加成至 2024 年前、2028 年前可用）在 2026 税年已全部作废，现行规则已恢复并更新为再加速投资激励财产（RIIP）及即时费用化参数。 / Falls into the 'old AII dates' trap: in the old exam basis, the 2018 Accelerated Investment Incentive (AII, 50% net addition before 2024, usable before 2028) is entirely void for the 2026 tax year; the current rules have been restored and updated to the reaccelerated investment incentive property (RIIP) and the immediate expensing parameters.

b. ✓ 正确。按 2026 税年现行 T2 指南规则（与旧版 AII 考试口径不同），2026 年取得并投入使用的制造与加工机器设备（53 类，或 2025 年后取得按 43 类判、若在 2025 年取得会归 53 类的）适用即时费用化（immediate expensing），首年可 100% 扣除全部 $200,000，且该类别（以及 43.1 类清洁能源设备）的退坡要到 2029 年之后可用的财产才开始。 / Correct. Under the current 2026 tax year T2 guide rules (different from the old AII exam basis), manufacturing and processing machinery acquired and put into use in 2026 (Class 53, or judged as Class 43 where property acquired after 2025 would be Class 53 if acquired in 2025) qualifies for immediate expensing, and the whole $200,000 can be deducted at 100% in the first year, and the phase-down for this category (and for Class 43.1 clean energy equipment) begins only for property available for use after 2029.

c. ✗ 混淆了不同资产类别的退坡时间表：「2027 年前可用享受 100%、2026 年之后可用只剩半年规则豁免」是生产力资产（44、46、50 类）的截止期，而不是制造加工机器（53 类）与清洁能源设备（43.1 类）的 2029 年后退坡期（类别退坡年份混淆陷阱）。 / It confuses the phase-down timetables of different asset classes: 'available before 2027 for 100%, with only the half-year rule exemption for property available after 2026' is the deadline for productivity assets (Classes 44, 46 and 50), not the post-2029 phase-down for manufacturing and processing machinery (Class 53) and clean energy equipment (Class 43.1) (the class phase-down year confusion trap).

d. ✗ 记错了现行再加速投资激励财产（reaccelerated investment incentive property, RIIP）的时间窗：RIIP 适用于 2024 年之后取得、2034 年前可用的合格财产（其中 50% 净增加成在 2030 年前可用），并非 2030 年后才适用（RIIP 年份记反陷阱）。 / It misremembers the time window of the current reaccelerated investment incentive property (RIIP): RIIP applies to eligible property acquired after 2024 and available for use before 2034 (with the 50% net addition available before 2030), not only after 2030 (the RIIP years reversed trap).

81′ 答案 a

a. ✓ 正确。生产力资产（44、46、50 类）在 2024-04-15 后取得且 2027 年前可用的享受首年 100% 即时费用化（immediate expensing），2026 年之后才可用的只保留半年规则豁免；同时 2026-01-01 后取得的 10.1 类乘用车 CCA 上限由 $38,000 升至 $39,000 属于财政部新闻稿已宣布（announced）状态，而《所得税条例》ITR s.7307(1) 现行合订本末行仍写 $38,000。 / Correct. Productivity assets (Classes 44, 46 and 50) acquired after 2024-04-15 and available for use before 2027 qualify for 100% first-year immediate expensing, and those available only after 2026 keep just the half-year rule exemption; also, the increase of the Class 10.1 passenger vehicle CCA ceiling for vehicles acquired after 2026-01-01 from $38,000 to $39,000 has only been announced, in a Department of Finance news release, while the last line of the current consolidation of ITR s.7307(1) still reads $38,000.

b. ✗ 错在两处：2034 年前可用是再加速投资激励财产（RIIP）半年规则豁免的截止期，而 44、46、50 类的 100% 即时费用化只到 2027 年前可用；此外 ITR s.7307(1) 现行合订本末行仍为 $38,000，$39,000 尚未写入条例合订本正文（把已宣布当已入法陷阱）。 / It is wrong in two places: 'available before 2034' is the deadline for the half-year rule exemption for reaccelerated investment incentive property (RIIP), whereas 100% immediate expensing for Classes 44, 46 and 50 lasts only for property available before 2027; also, the last line of the current consolidation of ITR s.7307(1) still reads $38,000, and $39,000 has not yet been written into the body of the consolidated regulations (the trap of treating announced as enacted).

c. ✗ 落入「误用旧版 AII 日期」陷阱：43.1 类清洁能源设备的 100% 首年扣除要到 2029 年之后可用的财产才开始退坡（不是 2026 年后），且 2018 版 AII 日期在 2026 税年已作废，现行适用 RIIP 参数。 / Falls into the 'old AII dates' trap: the 100% first-year deduction for Class 43.1 clean energy equipment begins to phase down only for property available for use after 2029 (not after 2026), and the 2018 AII dates are void for the 2026 tax year, with the RIIP parameters applying now.

d. ✗ 违反了 RIIP 的三项资格红线：再加速投资激励财产（RIIP）要求此前没有人就该财产申报过 CCA 或终止损失、没有以递延税基的滚存（rollover）方式转让给本公司、且此前未由本公司或非公平交易方（non-arm's length）持有或取得（RIIP 关联滚存禁令陷阱）。 / It violates the three qualification red lines for RIIP: reaccelerated investment incentive property (RIIP) requires that no one has previously claimed CCA or a terminal loss on the property, that it was not transferred to the corporation on a tax-deferred rollover, and that it was not previously owned or acquired by the corporation or a non-arm's length person (the RIIP related-party rollover ban trap).

82 答案 b

a. ✗ 落入「误用已取消的三分之二资本利得纳入率」陷阱：将资本利得纳入率从 1/2 提高到 2/3 的提案在推迟生效日到 2026-01-01 后已被正式宣布取消，2026 税年任何按 2/3 编写的考试口径或模板均已过期。 / Falls into the trap 'Using the cancelled two-thirds capital gains inclusion rate': the proposal to raise the capital gains inclusion rate from 1/2 to 2/3 was formally cancelled after its effective date was postponed to 2026-01-01, so any exam basis or template written with 2/3 is out of date for the 2026 tax year.

b. ✓ 正确。现行 T2 指南明确规定，Schedule 6（资本财产处置汇总）上的金额 P 若为利得，仍按二分之一（P × 1/2）填入金额 R 与 Schedule 1 第 113 行（2/3 提案已取消）；同时保留特殊纳入率：向合格受赠人捐赠特定证券或环境敏感土地一般适用零纳入率（0%），而在 s.100(1) 下处置资产全部为存货、可折旧财产或资源财产的合伙企业权益时，可按 100% 纳入。 / Correct. The current T2 guide expressly provides that if Amount P on Schedule 6 (summary of dispositions of capital property) is a gain, it is still entered at one-half (P x 1/2) in Amount R and on Schedule 1 line 113 (the 2/3 proposal was cancelled); special inclusion rates remain: donations of certain securities or ecologically sensitive land to a qualified donee generally carry a 0% inclusion rate, whereas the disposition of an interest in a partnership whose assets are all inventory, depreciable property or resource property under s.100(1) can be included at 100%.

c. ✗ 搞混了会计处置利得与税法应税资本利得的两步替代关系：账上记了的资产处置收益属于「账上记了而税上不计」的减项，应先在 Schedule 1 减去账面处置利得，再把 Schedule 6 算出的应税资本利得（P × 1/2）加回到 Schedule 1 第 113 行（税会处置损益替代关系陷阱）。 / It mixes up the two-step replacement of an accounting gain on disposal and the taxable capital gain under tax law: a disposal gain recorded in the books but not taxed is a deduction (booked but not taxed), so the book disposal gain should first be subtracted on Schedule 1, and then the taxable capital gain computed on Schedule 6 (P x 1/2) added back on Schedule 1 line 113 (the replacement relationship between book and tax gains on disposal trap).

d. ✗ 把 0% 纳入率和 100% 纳入率的对象彻底搞反了：0% 纳入率适用于向合格受赠人捐赠特定证券或环境敏感土地；而在 s.100(1) 下处置资产全部是存货、可折旧财产或资源财产的合伙企业权益时，整笔按 100% 纳入（特殊纳入率颠倒陷阱）。 / It swaps the objects of the 0% and 100% inclusion rates: the 0% inclusion rate applies to donations of certain securities or ecologically sensitive land to a qualified donee, whereas the disposition of an interest in a partnership whose assets are all inventory, depreciable property or resource property under s.100(1) is included in full at 100% (the swapped special inclusion rates trap).

82′ 答案 d

a. ✗ 落入「误用已取消的三分之二资本利得纳入率」陷阱：前两项特殊纳入率正确，但标准公司资本利得纳入率提至 2/3 的提案已取消，2026 年现行标准纳入率仍为 1/2。 / Falls into the trap 'Using the cancelled two-thirds capital gains inclusion rate': the first two special inclusion rates are right, but the proposal to raise the standard corporate capital gains inclusion rate to 2/3 was cancelled, and the current 2026 standard inclusion rate is still 1/2.

b. ✗ 把两项特殊规则的纳入率完全对调了：s.100(1) 下此类合伙权益处置按 100% 纳入，而向合格受赠人捐赠特定证券（无利益好处）适用 0% 零纳入率（特殊纳入率对调陷阱）。 / It swaps the inclusion rates of the two special rules: a disposition of such a partnership interest under s.100(1) is included at 100%, whereas a donation of certain securities to a qualified donee (with no benefit received) carries a 0% inclusion rate (the swapped special inclusion rates trap).

c. ✗ 误以为特殊纳入率已被废除：2026 税年现行 T2 指南仍然保留合格捐赠特定证券/环境敏感土地的 0% 纳入率以及 s.100(1) 下合伙企业权益处置的 100% 纳入率（虚构废除陷阱）。 / It wrongly assumes the special inclusion rates were repealed: the current 2026 T2 guide still keeps the 0% inclusion rate for donations of qualifying securities or ecologically sensitive land and the 100% inclusion rate for dispositions of partnership interests under s.100(1) (the invented repeal trap).

d. ✓ 正确。在 s.100(1) 下，若合伙企业资产全部是存货、可折旧财产或资源财产（无例外），处置该合伙企业权益整笔按 100% 纳入；向合格受赠人捐赠特定证券或环境敏感土地（未取得利益或好处）适用 0% 零纳入率；而普通公司资本利得在 2/3 提案取消后，2026 税年仍按 1/2（P × 1/2）填入 Schedule 6 金额 R 与 Schedule 1 第 113 行。 / Correct. Under s.100(1), where all of the partnership's assets are inventory, depreciable property or resource property (with no exception), a disposition of the partnership interest is included in full at 100%; a donation of certain securities or ecologically sensitive land to a qualified donee (with no benefit or advantage received) carries a 0% inclusion rate; and an ordinary corporate capital gain, after the 2/3 proposal was cancelled, is still entered at 1/2 (P x 1/2) in Amount R on Schedule 6 and on Schedule 1 line 113 for the 2026 tax year.

83 答案 d

a. ✗ 同时踩中「附表回填错位：账面准备进表 13、合伙利得进第 129 行」两个陷阱：合伙企业分配的应税资本利得严禁填在 Schedule 1 第 129 行，而财报上的会计准备严禁填进 Schedule 13。 / It steps into both pits of 'Misplaced schedule entries: accounting reserves on Schedule 13 and partnership gains on line 129': taxable capital gains allocated by a partnership must never be entered on Schedule 1 line 129, and accounting reserves from the financial statements must never be entered on Schedule 13.

b. ✗ 前半句正确，后半句踩中「账面准备进表 13」陷阱：准备金连续性表（Schedule 13）只放税法允许的准备，财报上的期初期末准备必须走 Schedule 1 的第 414 行与第 126 行。 / The first half is correct and the second half steps into the 'accounting reserves on Schedule 13' trap: the continuity of reserves schedule (Schedule 13) holds only reserves allowed by tax law, and the opening and closing accounting reserves on the financial statements must go through Schedule 1 lines 414 and 126.

c. ✗ 后半句正确，前半句踩中「合伙利得进第 129 行」陷阱：合伙企业分配给公司合伙人的应税资本利得或可扣资本损失，不能填在 Schedule 1 第 129 行，必须填进公司自己的 Schedule 6。 / The second half is correct and the first half steps into the 'partnership gains on line 129' trap: taxable capital gains or allowable capital losses allocated by a partnership to a corporate partner cannot be entered on Schedule 1 line 129 and must be entered on the corporation's own Schedule 6.

d. ✓ 正确。根据 T2 指南规则：第一，合伙企业分配给公司合伙人的应税资本利得或可扣资本损失，不填 Schedule 1 第 129 行，而应把公司所占份额填进公司自己的资本财产处置汇总表（Schedule 6）；第二，准备金连续性表（Schedule 13）只放税法明文允许的准备，财报上的期初期末会计准备直接走 Schedule 1 的第 414 行与第 126 行。 / Correct. Under the T2 guide rules: first, taxable capital gains or allowable capital losses allocated by a partnership to a corporate partner are not entered on Schedule 1 line 129 but the corporation's share is entered on the corporation's own summary of dispositions of capital property (Schedule 6); second, the continuity of reserves schedule (Schedule 13) holds only reserves expressly allowed by tax law, and the opening and closing accounting reserves on the financial statements go directly through Schedule 1 lines 414 and 126.

83′ 答案 b

a. ✗ 落入「附表回填错位：账面准备进表 13」陷阱，把两者的通道彻底说反了：Schedule 13 只填税法允许的准备，而财报上的期初期末会计准备走 Schedule 1 第 414 行与第 126 行。 / Falls into the trap 'accounting reserves on Schedule 13' and states the two channels the wrong way round: Schedule 13 holds only tax-permitted reserves, whereas the opening and closing accounting reserves on the financial statements go through Schedule 1 lines 414 and 126.

b. ✓ 正确。资本成本折让表（Schedule 8）将现行再加速投资激励财产（RIIP）与旧版加速投资激励（AII）分列在第 4、5 两栏；同时公司作为合伙企业成员（需填 Schedule 73）分得的资本利得或损失份额，必须填进公司自己的 Schedule 6，不得填在 Schedule 1 第 129 行。 / Correct. The capital cost allowance schedule (Schedule 8) shows the current reaccelerated investment incentive property (RIIP) and the legacy Accelerated Investment Incentive (AII) in separate columns 4 and 5; also, a corporation's share of capital gains or losses allocated as a partner of a partnership (which requires Schedule 73) must be entered on the corporation's own Schedule 6 and not on Schedule 1 line 129.

c. ✗ 把两张附表的功能互换了：Schedule 16 是惠顾分红扣除（patronage dividend deduction），而 Schedule 73 才是合伙企业成员的收入计入汇总（附表编号互换陷阱）。 / It swaps the functions of two schedules: Schedule 16 is the patronage dividend deduction, whereas Schedule 73 is the summary of income inclusions of a partnership member (the swapped schedule numbers trap).

d. ✗ 把 Schedule 1 上「其他加项」与「其他减项」的页码和行列号完全颠倒了：没有列名的加回项走第 3 页的 605 列、295 列与第 296 行「其他加项」，没有列名的减项才走第 4 页的 705 列、395 列与第 396 行「其他减项」（加减项行列号颠倒陷阱）。 / It reverses the page and line numbers of 'other additions' and 'other deductions' on Schedule 1: unlabeled additions go through column 605, column 295 and line 296 'other additions' on page 3, while unlabeled deductions go through column 705, column 395 and line 396 'other deductions' on page 4 (the swapped addition and deduction line numbers trap).

84 答案 a

a. ✓ 正确。Schedule 141（附加信息）把编表人的身份、执业资格、独立性（是否与公司关联）以及有无提出保留意见（reservation）写进申报内容；电子申报 T2 时，已编制的财报附注（notes to the financial statements）仍须以文本形式随传输一并提交（漏交属申报不完整）；且税务净收入全国一套不分省重算，BC 省在 Schedule 427 上直接沿用联邦算出的应税收入基数计算省税。 / Correct. Schedule 141 (additional information) puts the preparer's identity, professional designation, independence (whether related to the corporation) and any reservation expressed into the return; when e-filing the T2, the notes to the financial statements that have been prepared must still be submitted as text with the transmission (leaving them out makes the filing incomplete); and net income for tax purposes is one nationwide set without provincial recalculation, so BC's Schedule 427 directly uses the taxable income base computed federally to compute provincial tax.

b. ✗ 误解了「电子申报不用再寄纸质附注」的含义：「不用寄纸件」不等于「不用做或不用交」——只要编制了财报附注，电子申报时必须以文本形式随传输提交，漏交属于申报不完整（漏交附注陷阱）。 / It misunderstands 'electronic filers no longer mail paper notes': 'no need to mail paper' does not mean 'no need to prepare or submit'; as long as the notes to the financial statements have been prepared, they must be submitted as text with the transmission when e-filing, and leaving them out makes the filing incomplete (the omitted notes trap).

c. ✗ 两处均错：第一，Schedule 141 问的不是数字而是人（谁经手财务信息、有无会计执业资格、是否关联、有无保留意见及谁编制 T2）；第二，BC 省在 Schedule 427 上不重算税务净收入，而是共用联邦应税收入（表 141 用途与省级重算双重误区）。 / Both are wrong: first, Schedule 141 does not ask for numbers but about people (who handled the financial information, whether they hold an accounting designation, whether related, whether there was a reservation and who prepared the T2); second, BC does not recalculate net income for tax purposes on Schedule 427, but shares the federal taxable income (the double misconception of the use of Schedule 141 and provincial recalculation).

d. ✗ 错在两处：第一，Schedule 1 少加回导致应税收入被低估时，补税利息是按规定利率「逐日复利（compounded daily）」而非单利计算（若属重大失实陈述，正常复评期外仍可重开）；第二，Schedule 1 的每一处调整都会同时改变联邦税和省税两个数（复利与省税联动忽视陷阱）。 / It is wrong in two places: first, when understated Schedule 1 add-backs cause taxable income to be understated, interest on the additional tax is computed at the prescribed rate 'compounded daily', not simple interest (and if there is a misrepresentation, reassessment is still possible outside the normal reassessment period); second, every adjustment on Schedule 1 changes both the federal tax and the provincial tax figures (the trap of ignoring compound interest and the provincial tax link).

84′ 答案 b

a. ✗ 三处全错：内部无资格人员编表也必须填 Schedule 141；编了财报附注在电子申报时必须以文本随传输提交；BC 省在 Schedule 427 上不重算税务净收入（全盘违规陷阱）。 / All three are wrong: Schedule 141 must be filled in even if the statements were prepared internally by someone without a designation; the notes to the financial statements, once prepared, must be submitted as text with the transmission when e-filing; and BC does not recalculate net income for tax purposes on Schedule 427 (the all-wrong violation trap).

b. ✓ 正确。Schedule 141 要求如实披露经手财务信息人员的身份、无执业资格及与公司的关联关系（使 CRA 一眼区分内部编表与外部审计财报）；已编制的财报附注（notes to the financial statements）必须以文本形式随电子传输提交；且 BC 省 Schedule 427 直接在联邦应税收入基数上计算省税，不单独重算税务净收入。 / Correct. Schedule 141 requires truthful disclosure of the identity of the person who handled the financial information, the absence of a professional designation and any connection with the corporation (so the CRA can tell at a glance an internally prepared return from externally audited statements); the notes to the financial statements that have been prepared must be submitted as text with the electronic transmission; and BC's Schedule 427 computes provincial tax directly on the federal taxable income base without separately recalculating net income for tax purposes.

c. ✗ 电子提交 T2 的公司不必再寄送纸质财报与纸质附注（以文本随传输送出即可），且 BC 省 Schedule 427 随联邦 T2 一起申报，不需要单独的省级税号（冗余程序陷阱）。 / A corporation filing the T2 electronically need not mail a paper copy of the statements or paper notes (sending them as text with the transmission is enough), and BC's Schedule 427 is filed with the federal T2, with no separate provincial tax number needed (the redundant procedure trap).

d. ✗ 虚假填报 Schedule 141 属失实陈述（GIFI 校验查的是三条等式和七个必填代码，不要求必须外部审计），且省级投资税收抵免是在算出省税后在省级附表上抵扣，不在联邦 Schedule 1 上扣除（虚假披露与抵免错位陷阱）。 / A false answer on Schedule 141 is a misrepresentation (GIFI validity checks look at the three equations and seven mandatory codes and do not require an external audit), and a provincial investment tax credit is deducted on the provincial schedule after the provincial tax is computed, not on federal Schedule 1 (the false disclosure and misplaced credit trap).