Grace Pereira

Partner

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Business Tax
ETFs, Structured Products & Closed-End Funds
Mutual Funds
Private Funds, Hedge Funds & Alternative Investments
Investment Management

Grace has a taxation of investment funds practice, where she advises funds, their managers and sub-advisers. Her experience includes:

- Structuring new products;
- Restructurings;
- Acquisitions;
- Investment fund mergers, wind-ups and qualifying dispositions;
- Transfer pricing;
- Registered plans; and
- FATCA & CRS due diligence and reporting.

In her taxation of executive compensation practice, Grace is involved in all aspects of the design and implementation of tax-effective executive compensation plans for public and private employers. This includes:

- stock option plans
- share appreciation rights
- share bonus and share purchase plans
- restricted share unit (RSU) plans
- deferred share unit (DSU) plans
- performance-based medium and long-term incentive plans

Grace is an active member of the Taxation Working Groups of the Investment Funds Institute of Canada, the Canadian ETF Association and the Portfolio Management Association of Canada and has assisted them with submissions on investment funds industry issues to the Department of Finance and the Ontario Ministry of Finance. She also advises taxpayers in disputes with the Canada Revenue Agency.

Experience

- Advising a Canadian Schedule 1 bank in the creation and launch of a series of new exchange-traded funds (ETFs) in the Canadian market.
- Advising on the establishment of publicly-listed real estate investment trusts (REITs) in the Canadian market.
- Advising on the transfer pricing disputes relevant to Canadian-based global investment managers.

Insights & Events

- Author, "When is a Financial Institution not a Financial Institution: CRA Announces New Administrative Positions on FATCA/CRS Compliance", BLG Article, April 2024
- Author, "Employee ownership trusts: Business succession alternative for private businesses in Canada", BLG Article, February 2024
- Author, "New trust reporting rules are now in effect", BLG Article, January 2024
- Author, "Finance introduces relief for ETFs from Share Buyback Tax", BLG Article, November 2023
- Author, "2023 Fall Economic Statement – Tax measures", BLG Article, November 2023
- Pearls of wisdom: Investment management regulatory trends and preparing for the new SRO, BLG Video, January 2023
- Author, "Changes to the CRA’s FATCA/CRS guidance for financial accounts held by trusts", BLG Article, December 2022
- Author, "2022 fall economic update – Helping Canadians and tackling inflation", BLG Article, November 2022
- Author, "Winter and FATCA/CRS audits are coming for financial institutions", BLG Article, October 2022
- Author, "Canada’s First Home Savings account", BLG Article, September 2022
- Author, "Latest FATCA/CRS Guidance: What Canadian financial institutions need to know", BLG Article, March 2022
- Author, "Latest FATCA/CRS Guidance: Changes relevant to the asset management industry", BLG Article, March 2022
- Author, "Federal government introduces proposed trust reporting rules", BLG Article, March 2022
- Author, "Canadian government proposes legislation restricting employee stock option deductions", BLG Article, December 2020
- Author, "FATCA and CRS compliance for client name accounts", BLG Article, August 2020
- Author, "Newest developments on FATCA and CRS compliance", BLG Article, August 2020
- Author, "Latest developments on FATCA and CRS compliance", BLG Article, April 2020
- Author, "Canadian FATCA Compliance Update", BLG Article, October 2019
- Author, "Mutual Fund Trusts — Revised Proposals Relating to Allocation To Redeemers", BLG Article, August 2019
- Author, "Canadian FATCA and CRS Compliance Updates", BLG Article, December 2018
- Author, "Canadian FATCA and CRS Compliance Updates", BLG Article, December 2018
- Author, "Federal Budget 2018 – A Continued Focus on Fairness and the Middle Class", BLG Article, February 2018
- Author, "Cross-Border Tax Issues: Withholding Obligations", BLG Article, January 2018

- Author, "The proposed new GST/HST definition of an "investment limited partnership" and what it may mean for your business", BLG Article, September 2017
- Author, “Tax Topics,” Canadian Tax Journal

Beyond Our Walls

Professional Involvement

- Member, Canadian Bar Association
- Member, Canadian Tax Foundation
- Member, Tax Working Group, Portfolio Management Association of Canada
- Member, Tax Working Group, Canadian ETF Association
- Member, Taxation Working Group, The Investment Funds Institute of Canada

Community Involvement

- Portuguese-Canadian Lawyers Association

Awards & Recognitions

- Recognized in the 2024 edition of *Best Lawyers in Canada*® (Tax Law).
- Recognized in the 2024 edition (and since 2020) of *The Canadian Legal Lexpert® Directory* (Corporate Tax; Investment Funds & Asset Management - Investment Funds - Tax).
- Recognized in the 2023 edition of *Lexpert Special Edition: Finance and M&A*

Bar Admission & Education

- Ontario, 1999

- LLB, Queen's University, 1997
- BA (Hons.), Queen's University, 1994
