# Steve Suarez

## Partner

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Mining
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United Kingdom and Europe
Agribusiness
Renewable Energy

Steve Suarez is a partner in the Toronto office of Borden Ladner Gervais LLP. He works exclusively in the income tax area, focusing on mergers and acquisitions, inbound & outbound investment, corporate restructurings and audit management and tax dispute resolution, with particular focus on the energy and natural resources sector.

He writes and speaks frequently on taxation matters and is active in numerous Canadian and international tax organizations. He is the founder of Business Tax Canada, a website devoted to Canadian tax issues of interest to non-resident businesses and investors, and created and maintains www.miningtaxcanada.com, a website devoted to taxation issues of relevance to the mining community.

Steve is the Co-Chair of the Canadian Chamber of Commerce Economics & Taxation Committee, a Councillor of the Canadian Branch of the International Fiscal Association, and a member of the Taxation Committee of the Mining Association of Canada. He is listed as a leading tax practitioner in various international and Canadian directories of legal advisors.

Steve is a member of the Law Society of Ontario, admitted to the bar of New York, and on the Roll of Solicitors (England & Wales).

## Experience

- Williams Treaties First Nations on its $700 million investment in Ontario's Darlington New Nuclear Project
- Kubik, on the $75 million investment of Alaris Equity Partners into Kubik LP
- Invesco, on its sale of its Canadian fund business with combined total assets under management of approximately $27 billion to CI Global Asset Management Qvantel, a global leader in digital BSS, in its strategic acquisition of Optiva (TSX:OPT), a leader in cloud-native charging and agentic AI BSS capabilities.
- Counsel to **RFA Capital Holdings Inc.** in its business combination with Artis Real Estate Investment Trust to form RFA Financial.
- Counsel to **Guardian Capital Group** Limited in its $1.67 billion go-private transaction with Desjardins Global Asset Management Inc.
- Advised **Guardian Capital Group** on the acquisition of Galibier Capital Management.
- Acted for **Organigram Holdings Inc.** on the acquisition of Motif Labs Ltd.
- Acted for **Focus Financial Partners** on the consolidation of Dorchester Wealth Management with Cardinal Point Capital Management ULC.
- Advised **Trive Capital** in connection with its investment in Crunch Canada.
- Acted for **WasteCo** in connection with its sale to Republic Services Inc.
- Represented **Telesat Corporation** in $2.54B funding agreement (for its subsidiary, Telesat LEO Inc.) for its broadband satellite constellation.
- Acting for **Guardian Capital Group Limited** in connection with the $750 million sale of its insurance managing general agencies, mutual fund dealer and investment dealer businesses.
- Acting for **Focus Financial Group** in connection with the acquisition of various financial advisors in Canada, including Westcourt Capital, Gavin Wealth, and Cardinal Point.
- **Bell Canada** in its acquisition of Stratejm, a cybersecurity service company.
- **Bell Canada** in its acquisition of CloudKettle, a provider of tech services and Salesforces capabilities for enterprises.
- Represented **Modine** in its acquisition of Scott Springfield Manufacturing.
- Represented **Northland Power Inc.** and its affiliates on the acquisition, development, construction, debt and equity financing of the $750 million, 250 MW Oneida battery storage project.
- Represented **Pan American Silver Corp**. in its joint US$4.8 billion acquisition, with Agnico Eagle Mines Limited, of Yamana Gold Inc.
- Acted for **Capital Power Corporation** (TSX:CPX) in connection with its public offering of $350 million green 7.95% Fixed-to-Fixed Rate subordinated notes under a base shelf prospectus, as supplemented by a prospectus supplement.
- Acted as Counsel for the **Canadian Chamber of Commerce,** intervening before the Supreme Court of Canada in *Deans Knight Income Corporation v His Majesty the King*.
- **Loblaw Companies Limited,** on the $845 million acquisition by its wholly-owned subsidiary Shoppers Drug Mart of Lifemark Health Group.
- **Sterling Capital Brokers** in its merger with Luedey Consultants Inc. to become one of the largest independent employee-owned benefit consulting firms in Canada.
- **Epiroc Canada Holding Inc.**, a subsidiary of Epiroc Rock Drills AB, in its acquisition of 100% of MineRP Holdings Inc. from Dundee Precious Metals Inc. (TSX: DPM).
- **BNY Mellon Wealth Management**, Advisory Services, Inc. in its sale to Guardian Capital Group (TSX: GCG).
- **SterlingCapitalBrokers Ltd.** acquired all of the issued and outstanding shares of Riverview Insurance Solutions Inc.

- **Virtu Financial** (NASDAQ: VIRT), a leading provider of financial services and products that leverages cutting-edge technology, in its sale of MATCHNow marketplace to Cboe Global Markets.
- **Canadian Premier Life Insurance Company** in its acquisition of Gerber Life Insurance Company's Canadian insurance business from U.S.-based Western & Southern Financial Group.
- **Berkshire Hathaway Energy Company (BHE),** in its indirect share purchase acquisition of the Montana Alberta Tie-Line from Enbridge Inc. for an approximate purchase price of $200M.
- **Atlas Copco AB** on its divisive reorganization and spin-out of Epiroc AB.
- Represented the **Government of Canada** on its C$4.5 billion purchase of Kinder Morgan's Trans Mountain Pipeline to enable its inter-provincial expansion.
- **HollyFrontier Corporation** in connection with its acquisition of Petro-Canada Lubricants Inc. from Suncor Energy.
- **Health Care REIT** in connection with its $1-billion acquisition of HealthLease Properties REIT.
- **Ridley Inc.** in its acquisition by way of plan of arrangement by Alltech, Inc.
- **Cynapsus Therapeutics Inc.** in connection with its going-private transaction by way of plan of arrangement involving Sunovion Pharmaceuticals Inc.
- **The DOW Chemical Company** in connection with the sale of its ownership interest in MEGlobal to EQUATE Petrochemical Company K.S.C. (EQUATE).
- **JLL Partners** in connection with its acquisition of Patheon Inc. and concurrent combination with Royal DSM.
- Agents (co-led by RBC Capital Markets and TD Securities Inc.) in the offering of senior unsecured debentures, Series G of Cameco Corporation.
- **George Weston Limited** in connection with its issuance of senior unsecured notes.
- **Dominion Diamond Corporation** (formerly Harry Winston Diamond Corporation) in connection with its acquisition of the Ekati diamond mine from BHP Billiton Canada Inc.
- **Parrish & Heimbecker Limited** in its acquisitions of Weyburn Inland Terminal Ltd., Thirdcoast Limited and Dover Industries Limited.
- **Softchoice Corporation** in connection with its going-private transaction by way of plan of arrangement involving Birch Hill Equity Partners.
- **North American Energy Partners Inc.** in connection with the sale of its piling division to Keller Group plc.
- **Eldorado Gold Corporation** in its acquisition of European Goldfields Limited.
- **London Stock Exchange Group plc** in its proposed merger of equals with TMX Group Inc.
- **Inco Limited** on its proposed merger with Phelps Dodge Corporation and subsequent acquisition by Companhia Vale do Rio Doce.
- **Placer Dome Inc.** in the unsolicited offer by Barrick Gold Corporation and resulting negotiated merger.
- **BCE Inc.** in the formation of Bell Globemedia with The Thomson Corporation and The Woodbridge Company Limited.
- **Adolph Coors Company** on its merger with Molson Inc.
- **Walter Energy, Inc.** in its acquisition of Western Coal Corp.
- **The Seagram Company Ltd.** in its acquisition by Vivendi.
- **Magna International** in the going-private transactions of its publicly traded subsidiaries, Tesma, Decoma and Intier Automotive, and in its spin-out of MI Developments Ltd.
- **CanWest Global Communications Corp.** in its acquisition of Alliance Atlantis Inc.
- Acted for **Capital Power Corporation** (TSX:CPX) in connection with its public offering of $350 million green 7.95% Fixed-to-Fixed Rate subordinated notes under a base shelf prospectus, as supplemented by a prospectus supplement.

# Insights & Events

# Beyond Our Walls

### Professional Involvement

- Co-Chair, Economic & Taxation Policy Committee, Canadian Chamber of Commerce
- Councillor, Canadian branch of International Fiscal Association
- Co-chair, Toronto Centre Canada Revenue Agency and Tax Professionals Consultation Group
- Special Advisor, taxation committee of the Mining Association of Canada
- Member, Business at OECD Committee (BIAC)
- Past Chair, Tax Section of the Canadian Bar Association (Ontario)

# Awards & Recognition

- Recognized in the 2027 edition (and since 2023) of *The Best Lawyers in Canada* (Tax Law).
- Recognized in the 2026 edition of *ITR World Tax* (General Corporate Tax)
- Recommended as a key lawyer in the 2026 edition of *The Legal 500* (Tax)
- Recognized in the 2026 (and since 2016) edition of *Chambers Canada — Canada's Leading Lawyers for Business* (Tax (Nationwide - Canada)).
- Recognized in the 2026 (and since 2015) edition of *Chambers Global — The World's Leading Lawyers for Business* (Tax).
- Recognized in the 2025 edition of *Lexpert Special Edition: Insolvency & Restructuring*.
- Recognized in the 2025 edition of *Lexology Index* (formerly *Who's Who Legal*) *Thought Leaders: Global Elite 2025 Report*(Corporate Tax).
- Recognized in the 2026 edition (and since 2025) of *Lexpert Special Edition: Finance*
- Recognized in the 2024, 2023 and 2021 editions of *Lexpert Special Edition: Finance and M&A*
- Recognized in the 2026 (and since 2014) edition of *The Canadian Legal Lexpert Directory* (Corporate Tax)
- Recognized in the 2024 edition of *Lexpert Special Edition: Insolvency and Restructuring*
- Recognized as Leader in the 2023 edition of *ITR World Tax - World Tax Practitioners.*
- Recognized as one of the world's leading practitioners in the *Who's Who Legal: Corporate Tax 2024* report
- Recognized as a Global Leader in the 2024 edition (and since 2014) of *Who's Who Legal: Canada*(Corporate Tax Advisory, Corporate Tax Controversy) and as a National Leader in the 2022 edition of *Who's Who Legal: Canada* (Corporate Tax).
- Recognized in the 2022 edition of *IFLR1000 - Expert Guides - Guide to the World's Leading Tax Advisers* - Tax.
- Recognized in the 2022 (and 2016-2018) edition *of Lexpert/American Lawyer Guide to the Leading 500 Lawyers in Canada* (the Lexpert/ALM 500) (Corporate Tax).
- Recognized in the 2020 edition of *World Tax* (EG Tax Leading Advisor).
- Recognized in the fifth annual edition of the *Best Lawyers: Global Business Edition.*
- Recognized in the 2020 edition of *Who's Who Legal – Thought Leaders* (Corporate Tax - both Advisory and Controversy practice areas).
- Recognized as a leading Canadian lawyer in the 2019 (and since 2015) editions of the *Lexpert®/Report on Business Special Edition on Global Mining.*

- Recognized in the 2019 edition (and since 2015) of the *Lexpert®/ROB Special Edition – Canada's Leading Corporate Lawyers.*
- Recognized in the 2018 (and since 2016) edition of *The Legal 500 Canada (Tax).* Previously recognized in 2015 for Corporate Tax.
- Selected by peers for inclusion in the 2022 (and since 2015) editions of *The Best Lawyers in Canada®* (Tax Law).
- Recognized in the 2018 edition of *Who's Who Legal — The International Who's Who of Business Lawyers* (Corporate Tax — both advisory and controversy practice areas).
- Recognized as a Corporate Tax by *International Tax Review*.

## Bar Admission & Education

- Ontario, 1990
- New York, 1993
- Roll of Solicitors (England & Wales), 1994

- MBA, Ivey School of Business, University of Western Ontario, 1994
- JD, University of Toronto, 1988

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