Ryan Tax Review

Advice on International SR&ED Claims

The Canadian federal government's largest single source of business funding is the Scientific Research and Experimental Development (SR&ED) tax credit program. This incentive program was designed to encourage research and development (R&D) activities in Canada, but what happens if a Canadian business conducts a project outside of Canada?

We sat down with Jeffrey Stewart, a Senior Manager in Ryan's SR&ED practice, and asked about common concerns for SR&ED claims with an international component. Here's what Jeffrey had to say.

Question: *If a business is in Canada, but its parent company is outside of Canada, is the business still eligible for the SR&ED tax credit?*

Response: Yes, a business is not disqualified from SR&ED tax credits by virtue of its parent company being outside Canada, provided that the Canadian business pays Canadian taxes. In fact, one of the primary drivers for the start of the SR&ED program was to attract research to Canada paid for by foreign parent companies. However, the work must meet the SR&ED eligibility criteria (the how and why) and have eligible expenditures, such as labour, materials, and contractor expenses.

For example, say a food manufacturer producing baked goods in Ontario that is owned by an American company decides to undertake a project focused on increasing the shelf-life of one of its products. The Canadian entity would be able to claim the associated expenses as SR&ED and obtain both the federal and provincial investment tax credits in most provinces. Eligible expenses would include the cost of employees, contractors, and materials to modify the company's production processes to achieve their technical objective – a product with a longer shelf-life.

Question: *What if a Canadian business conducts SR&ED eligible activities outside of Canada? Can it still obtain the SR&ED tax credit for such work?*

Response: The answer depends on the kind of activities performed outside of Canada. If a Canadian business undertakes a project in Canada that meets the SR&ED eligibility criteria, and Canadian employees need to travel outside Canada to conduct eligible activities, such as testing, those labour costs may be eligible, up to a maximum of 10% of the overall claim amount. Materials for an eligible project may be purchased from anywhere in the world but must be consumed or rendered valueless by the SR&ED performed in Canada. On the other hand, contractor expenses for services being conducted outside of Canada are ineligible.

As an example, consider a Canadian concrete company operating out of Nova Scotia that wants to improve the strength of its concrete. Perhaps the company conducts SR&ED-eligible work in Canada, but to accurately measure the strength of various concrete mixtures, it needs to use specialized equipment to reliably test the material combinations that may result in a stronger product. If purchasing this equipment would be too expensive and Canada doesn't have a specialized testing lab with the required

THIS ISSUE

March 2024 | Volume 35 | Issue 1

equipment, the company might turn to a lab located in the U.S. to perform the necessary testing. The company might also ask certain employees to travel to that lab to conduct the tests. In this situation, the company could claim a portion of its employees' time spent outside Canada as a SR&ED expenditure. However, since the work would be performed outside of Canada, any expenses related to using the lab or materials for the trials would not be eligible for the tax credit.

Question: *Can a company claim expenditures related to materials purchased from an international supplier?*

Response: Yes, a business may generally claim materials purchased from foreign suppliers as an eligible expenditure, as long as those materials are required to complete an otherwise eligible SR&ED project taking place in Canada. The full "landed cost" of the materials – meaning the cost including shipping and duties – would form the expenditure base.

Question: *How about expenses for international contractors?*

Response: Unfortunately, no. Those expenses are not eligible. Contractors must be Canadian taxable suppliers and their work must take place within Canada for a business to claim such expenses as an eligible expenditure for SR&ED tax credit purposes.

Question: *What about overhead costs for locations outside of Canada? Can those be claimed as SR&ED?*

Response: No. The SR&ED eligibility criteria specifically state that overhead costs must be from a commercial location within Canada. When eligible, overhead costs can be calculated using either a specified proxy or traditional method in determining the expenditure amount for SR&ED purposes.

Question: *Do many other countries around the world have their own version of the SR&ED tax credit program, providing similar funding to help encourage investment in R&D?*

Response: Yes, many countries have implemented similar programs. In fact, 36 of 38 OECD (Organisation for Economic Co-operation and Development) countries have created R&D business incentive programs resembling Canada's SR&ED tax credit. The basis for these programs is the Frascati manual, which was created as a roadmap for countries to monetize their R&D efforts and allow businesses to commercialize and scale R&D projects.

To date, the United States, United Kingdom, and most countries in the European Union have their own variation of the SR&ED tax credit program which may be available to businesses operating internationally.

Question: *Can Ryan also help with international SR&ED claims?*

Response: Absolutely. Ryan is one of the largest SR&ED consulting firms in North America and Mentor Works, a Ryan company, specializes in Canadian government funding. Our team can provide a holistic approach to tax incentive and government funding programs and help businesses optimize their access to government assistance, whether a project is in the planning stages, underway, or already completed. We help businesses around the world apply for government funding, including those in the United States, United Kingdom, European Union, Canada, Australia, and more.

Jeffrey Stewart, PhD

Senior Manager,
Scientific Research and Experimental Development

jeffrey.stewart@ryan.com

Key Alternatives to the Canada Summer Jobs Program

Did your organization miss out on the last application window for the federal government's annual Canada Summer Jobs (CSJ) program? There may still be an opportunity to obtain a federal or provincial wage subsidy for younger hires in 2024.

The CSJ program is one of Canada's largest wage subsidy initiatives, providing funding for up to 100% of an eligible employee's wages for full-time work from 6 to 16 weeks in duration. This program is extremely popular and exhausts its funding each year. Unfortunately, many employers learn about this program too late, missing out on potential funding. To be successful, applications for a given year should generally be submitted in December of the previous year or early January of the current year, with eligible positions and candidates already in mind.

Alternative Programs

While the CSJ program application window for 2024 closed on

January 10, there are several other key wage subsidy, grant, and tax credit programs that can support labor costs for eligible positions and projects.

For youth hires, the National Research Council of Canada's Industrial Research Assistance Program (IRAP) Youth Employment Program (YEP) offers a Canada-wide wage support program for businesses conducting innovative research and development. To be eligible for the YEP, an organization must be an incorporated, for-profit, and financially stable Canadian business with 1 to 500 employees. Eligible candidates are graduates of post-secondary degree programs between 15 and 30 years old.

The YEP can provide funding up to $30,000 per graduate, for up to two candidates, for a period of 6 to 12 months. Applicants are responsible for finding eligible candidates before applying for the YEP, and funding for eligible projects varies depending on several factors, including business development, technological advancement, customer service, and administrative effort.

Another option is the Mitacs Accelerate Program, which matches small businesses with interns who have a master's or doctorate degree, or postdoctoral fellowship. These highly skilled young interns can help businesses overcome innovation challenges, conduct research, and develop relevant tools, models, technologies, or solutions. Available across Canada to businesses, corporations, and certain non-profit organizations in all industries and sectors, Mitacs Accelerate funding can provide up to $15,000 in business contributions of $7,500 per 4 to 6-month internship. In determining funding awards, preference is given to research and development projects in innovation.

In Ontario, the Canadian Tooling & Machine Association (CTMA) offers wage subsidies for youth hires by eligible employers in advanced manufacturing, tooling, precision machining, and other related trades. Under the Career-Ready with CTMA: Expanding Opportunities program, 50% of an eligible candidate's wages can be subsidized, to a maximum of $5,000 per 10 to 16-week placement, for successful applicants licensed to operate in Ontario. This program is designed to support employers in building a talent pipeline by introducing participants to careers in the precision metal-working sector.

Application Deadlines

The application process for all three alternatives is less stringent than for the CSJ program. Both the IRAP YEP and the Mitacs Accelerate programs have open intake periods, continuously accepting program applications. While the Career-Ready with CTMA program only has one intake period a year, which usually pops up between April and June, it is a lesser-known, more specialized program, giving eligible applicants in Ontario a greater chance for success.

Ryan and Mentor Works clients learn about available wage subsidy programs first. To find out more about Canadian hiring and training grant, loan, and funding programs, please visit our Mentor Works website at: https://www.mentorworks.ca/government-funding/human-resources-and-training/

Matthew Mongeon

Senior Specialist, Government Grants

matthew.mongeon@ryan.com

Bucking the Electric Vehicle Trend

While many Canadian jurisdictions currently offer various types of incentives to encourage the purchase of electric and hybrid electric vehicles by drivers and promote the development of electric vehicle technology by manufacturers, Alberta has defied this trend with one of the measures announced in its 2024 provincial budget – a new tax on electric vehicles.

Alberta's budget includes a proposal to introduce an annual tax of $200 on electric vehicles, excluding hybrid vehicles. The new tax will be paid by owners (in addition to the usual fee) when registering their electric vehicles. Ostensibly, the tax is required to ensure fairness, since electric vehicle drivers do not pay provincial fuel tax on gasoline that they do not purchase but use the same roads as drivers of other vehicles. The government also cites the unsupported fact that electric vehicles tend to be heavier than vehicles using internal combustion engines, potentially causing more wear on provincial roadways.

Fairness arguments aside, the new tax might also create a disincentive – albeit a small one – for drivers in Alberta to switch to electric vehicles. (Although it remains to be seen whether a $200 per year surcharge will discourage consumers from buying electric vehicles.) Nothing in the measure suggests that the government's objective is to curtail rising electric vehicle sales, but with Alberta's vast oil and gas resources, some will question whether the new tax is politically motivated.

The target date for implementation of the electric vehicle tax is January 1, 2025, leaving ample time for the province to clarify its intentions – and continue the debate.

New Tax on Home Flipping

In its 2024 budget, the Government of British Columbia announced an interesting measure designed to curb home flipping activity and further discourage speculators from driving up housing prices in the province. Under the proposed measure, a new "Home Flipping Tax" of up to 20% will apply to income from the sale of residential real estate held for less than two years, effective for properties sold on or after January 1, 2025.

Exemptions will be provided for various life circumstances resulting in the sale of a property within two years of purchase, as well as certain entities involved in residential construction and real estate development. Further details on the structure and reporting requirements for the tax are expected to be released in the spring.

Property Tax Deadlines Approaching

While the time limit to challenge a property tax assessment for the 2024 taxation year has already lapsed in certain Canadian jurisdictions, the deadline to file an appeal, complaint or request for reconsideration is fast approaching in others, as outlined below:

- Ontario – Request for reconsideration is due by April 2; and
- For several municipalities in Quebec, including Gatineau and Drummondville, the deadline to file a request for review for the current triennial roll is April 30.

Taxpayers should consider challenging the assessed value of a property whenever:

- A new property has been acquired in the last 12 months;
- There has been a change in use in all or a portion of a property;
- Physical changes to a property have been experienced, such as demolition, contamination, and additions; or
- There has been a recent appeal decision on a neighbouring property.

Latest CBSA Hit List Released

The Canada Border Services Agency (CBSA) regularly conducts trade verifications to ensure importers and exporters are compliant with various rules and regulations. In conducting audits and other verification activities in the areas of tariff classification, valuation, and origin, the CBSA uses both random verification measures and a list of verification priorities determined through risk-based assessment processes.

The verification priorities list (i.e., "Hit List") is helpful guidance for importers concerned about the potential risk associated with a compliance verification audit, as it details specific types of imported goods on which the CBSA intends to focus its compliance efforts.

The latest verification priorities list (dated January 2024), in addition to the usual targets, includes the following new items:

- The origin of bedding and drapery;
- The tariff classification of bags; and
- The tariff classification of spent fowl.

If your organization is selected for an audit and the CBSA identifies a compliance issue, corrective measures to import documentation will be required for up to four years.

For further information about the CBSA's compliance activities and priorities, please see:

CBSA Trade Compliance Verification – Latest List of Priorities

Automobile Deduction Limits and Expense Benefit Rates for 2024

As recently announced by both the Department of Finance Canada and Quebec Ministry of Finance, effective January 1, 2024, the automobile deduction limits and expense benefit rates are as follows:

- The limit on tax-deductible per kilometre allowances paid to employees for using their personal vehicles for business purposes has increased by two cents to 70 cents per kilometre for the first 5,000 kilometres and to 64 cents per kilometre thereafter (these rates are four cents per kilometre higher in the Northwest Territories, Nunavut, and Yukon);

- The capital cost allowance limit for passenger vehicles purchased in 2024 has increased by $1,000 to $37,000, plus applicable federal and provincial sales taxes, and the limit for eligible zero-emission passenger vehicles (CCA class 54) remains at $61,000, resulting in a maximum allowable input tax credit (ITC) of $1,850 for GST paid ($4,810 or $5,550 for HST paid at 13% or 15%, respectively) for a passenger vehicle acquired in 2024 that is not a zero-emission passenger vehicle;
- The limit on deductible leasing costs has increased by $100 to $1,050 per month (plus applicable federal and provincial sales taxes) for leases entered into in 2024, resulting in a maximum allowable ITC for GST paid in respect of an automobile lease entered into in 2024 of $52.50 per month for GST paid ($136.50 or $157.50 for HST paid at 13% or 15%, respectively); and
- The general prescribed rate used to determine the taxable benefit relating to the personal portion of the operating costs of an employer-provided automobile remains at 33 cents per kilometre (30 cents per kilometre for taxpayers employed principally in the selling or leasing of automobiles).

For further information about the impact of the new limits and rates on GST/HST ITC and QST input tax refund claims, please see:

Department of Finance Releases 2024 Automobile Deduction Limits and Expense Benefit Rates

Tax Alert | Quebec Confirms 2024 Automobile Deduction Limits and Rates

For more information on these and other recent tax developments, please visit our News & Insights page or contact the Ryan *Tax*Direct® line at taxdirect@ryan.com or 1.800.667.1600.

Enhanced GST/HST New Residential Rental Property Rebates

Last September, the federal government announced a significant enhancement to the GST rebate in place for new rental housing to help address the shortage of affordable housing in Canada by temporarily lowering development costs and providing builders with more incentive to undertake long-term rental residential construction projects.

Existing Rebate

The New Residential Rental Property Rebate is available in respect of the GST (or federal component of HST) paid by a landlord on the purchase of taxable rental property from a builder, or the same tax self-assessed on a deemed self-supply of rental property by a landlord-builder, where a qualifying residential unit costs less than $450,000, subject to several conditions. This rebate is calculated as the lesser of $6,300 and 36% of the total tax paid or self-assessed by the landlord in respect of the residential unit, if there is only one unit, or the proportion of the total tax paid or self-assessed represented by the particular unit's percentage of total floor space in a multiple unit residential complex. However, the rebate is also phased out by a formula where the fair market value of a unit is more than $350,000 and less than $450,000, limiting the tax relief available to builders.

Enhanced GST Rebate

Under the enhancement, the GST rebate has been increased to 100% and the phase-out mechanism has been removed for qualifying rental properties. The enhanced rebate is available for new rental housing developments (including projects undertaken by public service bodies) that qualify for the existing rebate and include at least four private apartment units or ten private rooms or suites, with 90% or more of the residential units designated as long-term rentals. Examples of eligible projects include apartment buildings, office building to residential complex conversions, student housing developments, and senior residences purpose-built for long-term rental accommodation.

However, the enhanced rebate is not available for the construction of individually owned condominium units, single-unit housing, duplexes, triplexes, housing co-ops in which the occupants have an equity interest, or owned houses situated on leased land or residential trailer park sites. (Note that the existing rebate may be available for these types of units.) In addition, the enhanced rebate does not apply to construction projects designed to substantially renovate existing residential housing. This is a logical exclusion, given that such projects typically take the under-renovation units off the market.

The enhanced rebate is available for new rental housing projects that commence between September 14, 2023, and December 31, 2030, provided construction is completed by December 31, 2035.

HST Rebates

When the enhanced GST rebate was announced, it was anticipated that certain provincial governments would follow suit by increasing rebates for the provincial component of the HST on qualifying projects. At the time of writing, four HST participating provinces have done so, with only New Brunswick not having announced plans to offer similar tax relief.

In its fall economic statement, Ontario announced that the existing HST New Residential Rental Property Rebate will be increased to 100% of the provincial component of the HST paid, with no maximum, for qualifying projects. This rebate was previously equal to 75% of the provincial portion of the HST paid and capped at a maximum of $24,000.

Consistent with the federal measure, the enhanced rebate will be subject to the same eligibility criteria and available for eligible new rental housing projects in Ontario that commence between September 14, 2023, and December 31, 2030 (inclusive), as long as construction is completed by December 31, 2035.

In addition, Prince Edward Island, Nova Scotia, and Newfoundland and Labrador have all announced enhanced HST rebates on new rental builds, with similar eligibility criteria and effective dates. However, in Prince Edward Island, the rebate will only cover the full provincial component of the HST on qualifying rental housing projects to a maximum of $35,000 per unit, and only a partial rebate will be available for projects completed after 2028 and before the end of 2035. In Newfoundland and Labrador, the provincial HST rebate will differ for qualifying purpose-built rental properties (100% rebate) and purchased or owner-built residential rental properties (36% rebate to a maximum of $12,600 per unit).

As with the existing residential rental property rebates, builders of qualifying projects are responsible for claiming GST/HST input tax credits during construction and filing rebate applications within the prescribed time limits.

If you have any questions about the enhanced GST/HST rebates for new residential rental properties, please contact Ryan *Tax*Direct® at 1.800.667.1600 or taxdirect@ryan.com.

From the Ryan *Tax*Direct® Line...

Our Client Support Services Team typically receives thousands of calls each year on the Ryan *Tax*Direct® line.

Every Canadian organization uses computer software and services to assist in the operation of their business. More recently, there has been a shift towards the use of cloud computing by organizations to satisfy their need for software and computing services. Cloud services can provide organizations with computing resources, including software, infrastructure, and data storage, through the internet on an on-demand basis. Since each of the Provincial Sales Tax (PST) provinces includes software in its tax base, many clients are questioning the tax status of cloud computing services. Here is a question we were recently asked about British Columbia PST and cloud computing services.

British Columbia PST and Cloud Computing Services

Question: We have a U.S. supplier who is not registered for British Columbia PST (BC PST) that is providing our company with cloud computing services. These services are to be accessed from Canadian locations, including several sites in British Columbia. It is our understanding that the server powering these services is in the U.S. We heard that a British Columbia Supreme Court case ruled that these services are not subject to BC PST. Does this court decision apply to the cloud computing services we are purchasing, and does it relieve us from the obligation to self-assess BC PST on these services?

Answer: Under the BC PST, software has been specifically identified as a taxable supply. As a result, a software program that is delivered or accessed by any means, or a right acquired to use a software program that is delivered or accessed by any means in British Columbia, will be taxable. The legislation requires that BC PST be paid or self-assessed on the purchase of software for use on, or with, an electronic device ordinarily situated in British Columbia, unless a specific exemption applies.

The BC PST legislation does not contemplate the tax status of software services, leaving these services outside the scope of the tax. Therefore, services to software, including services to test, install, configure, modify, repair, or restore software are generally not taxable. Complicating the application of tax to software services is the fact that BC PST applies to software updates. In general, mandatory maintenance agreements and optional maintenance agreements providing updates are taxable, but optional maintenance agreements providing only software services are exempt. Tax is only applicable to the amount charged for updates under optional agreements for both software services and updates, provided the charges are separately listed or the conditions under the bundled supply rules are met.

In the British Columbia Supreme Court case *Hootsuite Inc. v. The*

King (2023 BCSC 358), the application of tax to cloud computing services was the primary focus. The court undertook a detailed review of cloud computing services to determine if these types of supplies were taxable for BC PST purposes and found that there are two broad categories of cloud computing services available. The first category is Software as a Service (SaaS), where a cloud provider offers application software for their users which may be provided through the internet or made available offline with the ability to store data in the cloud. The second category is Infrastructure as a Service (IaaS), where cloud providers offer access to computational services, such as CPUs and storage through virtual machines on an on-demand basis. These services are typically marketed as providing computing capacity to eliminate the need for users to invest in hardware. The court concluded that SaaS is subject to BC PST where it is used from a British Columbia location, as it is considered the provision of software. On the other hand, IaaS was determined to be not subject to tax, as it is considered the purchase of a virtual computer and technical expertise, with no software provided to the user.

At the time of the court decision, it was thought that a clear understanding of how BC PST applies to cloud computing services was in place. However, British Columbia had a different viewpoint. The province's response was to announce its intention to introduce retroactive legislation in 2024 to ensure BC PST applies to cloud computing services, and this intention was reaffirmed in the province's 2024 budget. See Tax Alert | British Columbia Updates Software and Telecommunication Services Bulletins for more information about this change.

Therefore, customers purchasing cloud computing services for use from a British Columbia location are required to either pay BC PST when invoiced for the supply or self-assess the tax where the supplier does not collect it.

Have a different question? **Contact the Ryan *Tax*Direct® line at 1.800.667.1600 or taxdirect@ryan.com.**

Funding Support for Automotive SMEs in Ontario

As the Ontario government continues to prioritize the automotive sector, innovation and environmental consciousness are converging in the automotive industry, creating many opportunities for business. However, to remain competitive, automotive businesses must continually improve their efficiency and processes. In addition, the move toward a cleaner automotive sector may prove to be expensive for some businesses.

Recognizing the increased costs associated with the current transition in the industry, the Ontario government introduced the Ontario Automotive Modernization Program (O-AMP) to provide further support to small and medium-sized enterprises (SMEs) within the automotive supply chain. Funding under this program is intended to help qualifying SMEs modernize and adjust to the changing needs of their customers, and the next application intake window is expected to open later this month.

Funding Available

The O-AMP is specifically designed to assist Ontario automotive parts manufacturers in improving their operational efficiency and competitiveness through investments in new software technologies and lean methodologies. To achieve this objective, the program provides successful applicants with up to $150K to cover up to 50% of eligible project costs.

Eligible Applicants

To be eligible for the O-AMP, applicants must:

- Be a small or medium-sized manufacturer within the automotive supply chain in Ontario supplying original equipment manufacturers (OEMs) (distributors are ineligible for the program);
- Have less than 500 full-time payroll employees;
- Have less than $1 billion in annual revenue;
- Have at least 50% of their sales derived from the automotive sector; and
- Have a minimum of two years of financial statements.

Large companies (i.e., those with annual revenue of $1 billion or more) may be able to access funding through the O-AMP by partnering with an otherwise eligible SME automotive supplier. Past recipients of grants under the program must complete the project for which funding was received prior to submitting a new application.

Eligible Projects

To qualify for funding under the O-AMP, projects must fall within one of two categories: technology adoption or lean manufacturing. Technology adoption refers to the implementation of new software and related hardware (e.g., ERP systems, virtual machining software) to improve operational efficiency, productivity, or production sophistication. To be considered lean manufacturing, a business must adopt Industry 4.0 or lean manufacturing processes by implementing various lean principles or hiring a certified third-party consultant to help with a lean implementation project.

Application Deadline

The next O-AMP intake period is scheduled to open on March 27, 2024, and close on May 2, 2024.

The O-AMP has a vital role in steering automotive businesses towards sustainable upgrades and offers a competitive edge to successful applicants. In a landscape where innovation and efficiency are paramount, O-AMP stands out as a key opportunity for companies aspiring to stay at the forefront of the automotive sector in Canada.

The O-AMP is a popular program within the automotive industry, and we encourage prospective applicants to prepare for the upcoming application deadline as soon as possible. As with all competitive funding programs, swift, strategic action and proper planning are imperative to a successful application.

To learn more about the O-AMP and other grant opportunities in the automotive sector, please contact your Ryan or Mentor Works representative, or visit the Mentor Works website at:

https://www.mentorworks.ca/government-funding/automotive-funding-programs/

Malaga Mashrur

Marketing Specialist

malaga.mashrur@ryan.com

Ryan Training™

Check out our upcoming Ryan and Mentor Works webinars!

Ryan Webinars

APRIL	4/11/2024	Value-Added Taxation in Canada - Imports and Exports	**REGISTER**
	4/17/2024	Traversing Canada's Border – Part IV: Dealing with Canadian Governments	**REGISTER**
	4/25/2024	Employee Expense Reimbursements and Allowances	**REGISTER**
MAY	5/16/2024	Retail Sales Tax in Canada – Fundamentals	**REGISTER**
	5/22/2024	Traversing Canada's Border – Part V: Current Issues in Canadian Tax and Government Funding Roundtable	**REGISTER**
	5/30/2024	Retail Sales Tax in Canada - Exemptions and Real Property	**REGISTER**
JUNE	6/20/2024	Managing Common Audit Exposures – Part 1	**REGISTER**
	6/27/2024	Managing Common Audit Exposures – Part 2	**REGISTER**

Mentor Works Webinars

APRIL	4/3/2024	Top Government Funding Programs for Spring 2024	**REGISTER**
JUNE	6/5/2024	Top Government Funding Programs for Summer 2024	**REGISTER**

All courses are currently being offered only by webinar. Webinar start times vary. All course dates and times subject to change. Additional sessions may be added to accommodate client demand. For the most up-to-date webinar descriptions and dates, or to register for any Ryan training course, please visit the Ryan website at ryan.com/canada/about-ryan/events--webinars/ or Mentor Works events page at mentorworks.ca/events/.

6775 Financial Drive, Suite 102, Mississauga, Ontario L5N 0A4 | **PHONE** 905.567.7926 **FAX** 905.567.5549 **E-MAIL** info@ryanco.ca | *ryan.com/Canada*