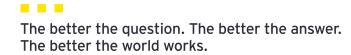
# How tax incentives fuel innovation and drive change





**Discovery considerations** 

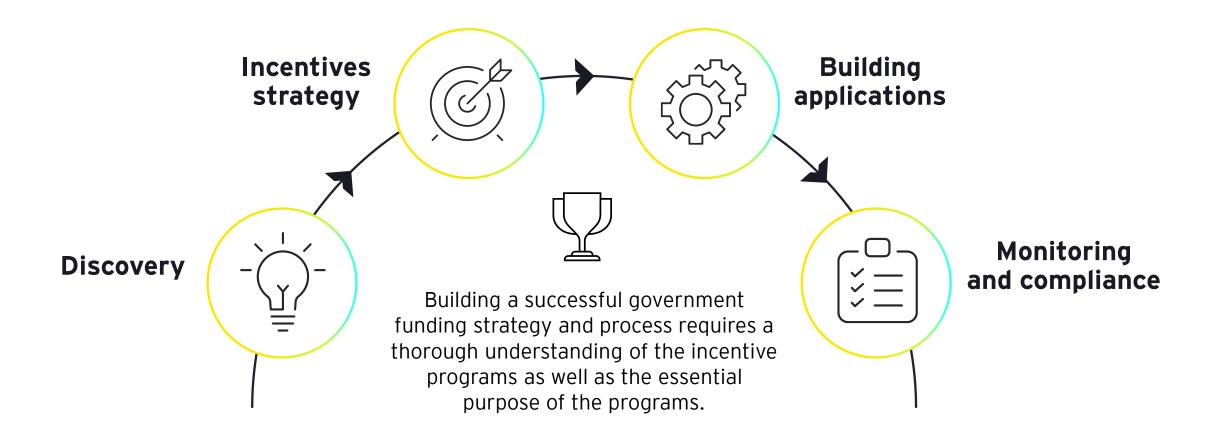
**Incentives strategy** 

Building applications case studies





# A practical approach to incentives







# Incentives indicators

Areas of investment that result in discretionary or legislated incentive opportunities

### Capital expenditures



- Greenfield investment
- Brownfield investment
- Facility expansion/ modernization
- Machinery/equipment
- Supply chain optimization
- Tariffs

### **Employment**



- Job creation/retention
- Training
- Upskilling
- New grads/apprentices

#### **Innovation**



- Research and development
- New product development
- Product performance or functionality enhancement
- Machinery/equipment development
- Software development

## Sustainability



- Green energy investments
- Energy efficient equipment
- Green buildings and development
- Renewable energy generation
- Carbon footprint reduction/carbon credits

# To fuel innovation and change



# Key elements to identify incentives

- What can have an impact on the incentive
- Incentives indicators / projects / investments
- Enable a forward looking and strategic incentives approach (Discretionary incentives vs tax credits)
- Update your incentives strategy every 6 months or with every change and new project / activity
- Have a robust and consistent method to track and capture incentives
- Use available tools

Collaborate with SMEs

Canadian IP

Projects with Indigenous communities

Focus on GHG reduction and increased energy efficiency and innovation

Location of the project / investment

Connectivity with government



# Tax policies that focus on innovation and emerging industries

#### Patent box regime

- In 2024, a prior Liberal government sought to establish a patent box.
- Preferential Tax treatment aimed at encouraging companies to retain intellectual property within Canada.
- Limited details in the platform; potential reduction in the combined corporate tax rate for income derived from eligible IP assets in Canada.

### Flow through shares

- AI, quantum computing, biotechnology, and advanced manufacturing to be able to offer flow-through shares to the public.
- The possibility of "stacked" tax incentives exists if integration with SR&ED is allowed, potentially enhancing the incentives available to businesses.

## Larger R&D refunds?

- CCPC's currently receive a 35% refundable tax credit on eligible R&D expenditures up to \$3 million, totaling \$1.05 million in refundable credits.
- The government Platform proposes to double the expenditure cap to \$6 million, allowing businesses to receive up to \$2.1 million in cash refunds annually.
- The Liberal Platform does not include a promise to expand the enhanced refundable tax credit to public companies from FES.



# Over 3600+ incentives available globally for sustainability activity

# Type of sustainability incentives

Sustainability incentives can generally be divided into three categories, that encourage:

A reduction in natural resource consumption

A switch to renewable or alternative energy sources

Innovation of new low carbon products and manufacturing processes

• €503b of EU budget

■ €672.5b EU Green Deal - funding allocated to meeting climate objectives

Europe



United States

IRA and ILJA

\$700b+ of new and

expanded incentives

related investments

for sustainability -



- £1b net Zero Innovation
- £1.4b Global Britain investment fund

United Kingdom

- Sustainability credits of over \$80b for the next 10 years
- The \$15b Canada Growth Fund will provide carbon pricing certainty

Canada



- \$15b National Reconstruction Fund: allocating \$3b for renewables and low emissions technologies
- \$2.55b Emission Reduction Fund

Australia

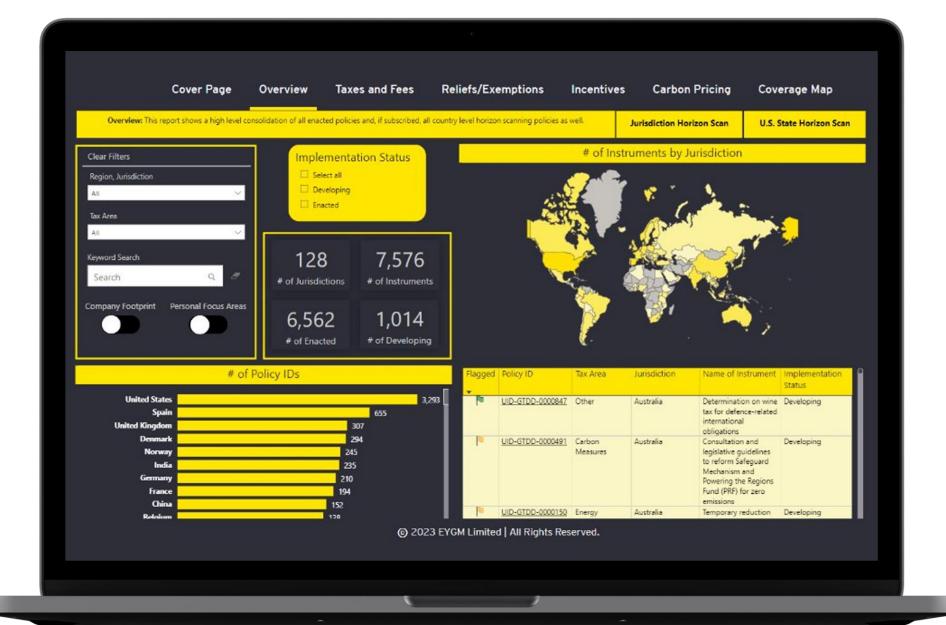


 \$3tn estimated total size of green investment opportunities

**ASEAN** 







# Incentives strategy

# Types of incentives offered

# Statutory: Automatic ("as of right")

Statutory tax credits & incentives that are provided to companies "as of right" if they meet defined statutory requirements

 Pre-certification or prior approval not required

General tax incentives

R&D incentives

Hiring incentives

Infrastructure incentives

Statutory: Pre-approval or

Statutory tax credits & incentives that

require companies to meet additional

approval qualifications within federal

and local regulations

**Prior Certification Required** 

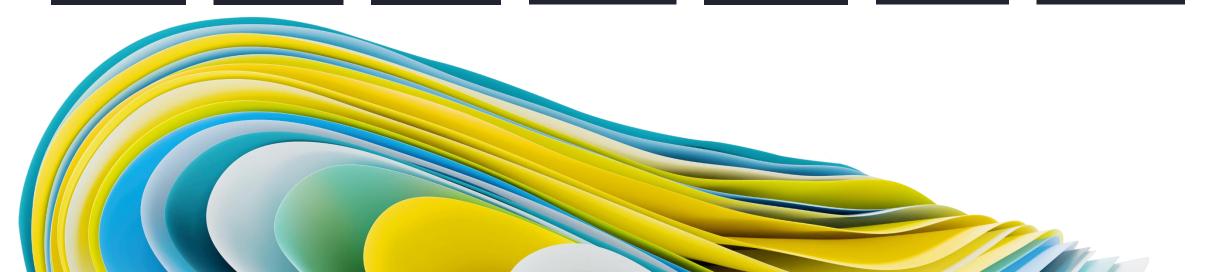
Incentives for energy savings

# Discretionary ("but for")

A "discretionary" grant is a grant in which a federal or provincial agency selects the awardee (i.e., grant recipient) based on merit and eligibility.

Grants and subsidies

Low or zero interest loans



# Discretionary versus statutory

# Discretionary

- Awarding process subjective and dependent on performance
- Application process before the project and involves negotiation and approval processes
- Financial support:
  - Grants
  - Subsidies
  - Loans
- Stacking limits

# **Statutory**

- Legislated objective and automatic, if eligibility criteria are met
- Claimed on tax returns with supporting documentation
- Financial support:
  - Tax credits
  - Reduced income tax rates (manufacturing rate reductions)
  - Accelerated tax deductions



# Federal and regional considerations

Tederal

30%\* Clean Technology Investment Tax Credit

30% Clean Technology Manufacturing Investment Tax Credit

15%\* Clean Electricity Investment Tax Credit

37.5%-60%\* Carbon capture utilization and storage Investment Tax Credit

15%-40%\* Clean hydrogen Investment Tax Credit

10% Electric vehicle supply chain Investment Tax Credit

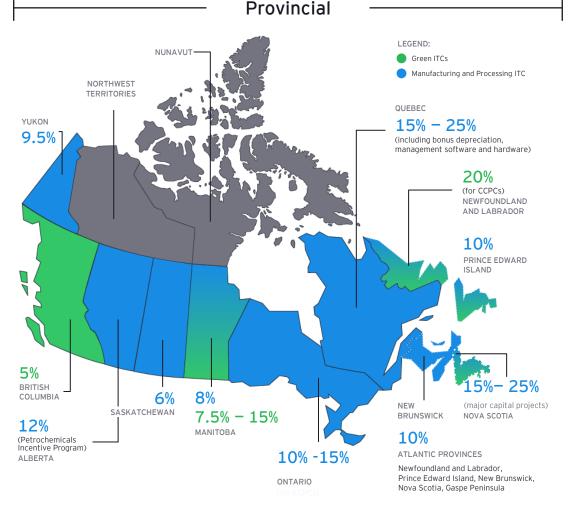
\*If certain labour requirements are not met, the ITC rate is reduced by 10%

Zero-emission technology manufacturing rate reduction



Up to 50%

reduction in Federal Corporate Income Tax Rate





# Roadmap

Incentives	Stacking Limits	Start Date	Mega Project components	Maximum funding %	Project Budget (CAD M)	Potential incentive (\$)		2024				2025			2026			2027					
								Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Scenario 1																							
EcoPerformance	75%	2025	Α		30		Grant*																
		2027	В	50%	15	10,0		Apply	Assesment & Negotiation			Execute the project											
		2025	С		10																		
C3I	No limits	2025	A	25%	30	5,0											Execute the p						
		2027	В		15	1,3	l ax credits										Execute the p						
		End of 2025	D		35	8,8							Execute the project										
		2025	С		10	0,0											Execute the p	project					
CT ITC	No limits	2027	В	30%	15	1,1	Tax credits												Execute th	e project			
Clean Hydrogen ITC	No limits	2025	С	15% - 40%	10	0,0	Tax credits					Execute the project								Apply			
Total					94	26,1																	
Scenario 2																							
LCEF	25% for	2025	A		30	7,5	Grant																
	federal 50% for all	2027	В	25%	15	3,8		Apply	Assesment & Negotiation			Execute the project											
	levels	2025	С		10	2,5																	
C3I	No limits	2025	А	25%	30	5,6	Tax credits					Execute the project											
		2027	В		15	2,8							Execute the project										
		End of 2025	D		35	8,8							Execute the project										
		2025	С		10	1,9							Execute the project										
ст ітс	No limits	2027	В	30%	15	2,5	Tax credits														Execute th	e project	
Clean Hydrogen ITC	No limits	2025	С	15% - 40%	10	2,3	Tax credits					Execute the project						Apply					
Total					94	37,6																	





# Case study 1:

# Manufacturing government grants and incentives

## Advanced manufacturing company

#### Background

 Advanced manufacturing company investing in a new production line for innovative, newly developed products engaged EY to maximize available funding.

#### Capital investment:

• \$31 Million

#### Jobs:

125 full-time jobs created

#### **Approach**

- EY analyzed the proposed project, which included a review of project budget documentation, and undertook discussions with key client personnel, including individuals from finance and operations, to understand the nature and benefits of the project
- The project was competitive, as the client was investing in innovative solutions for global market leaders in the medical, industrial, telecommunications, and aerospace industries, which would secure Canada's competitive position
- Assisted the client with preparation for meetings and negotiations with government officials, drafted a complete program application, assisted in contract review and ongoing compliance requirements for the project

#### Outcome

- Quebec government funding \$5M loan (0% interest, low interest, and forgivable)
- Federal government funding \$2M loan (0% interest)



# Case study 2:

# Clean technology tax incentives

#### Construction of new commercial office tower

#### Background

- Construction of a new commercial head office, including the installation of technology to reduce emissions.
- Project included:
  - Electric vehicle charging stations
  - Heat pump technology
  - Solar panels
  - Significant outdoor and communal areas
  - Significant technology investment

#### Capital investment:

\$170 million

#### Approach

- Reviewed proposed project and capital expenditures to identify and develop approach to secure:
  - Discretionary incentive opportunities prior to construction
  - Clean economy investment tax credits available
- Reviewed project documentation, discussions with key personnel, including individuals from finance and operations, to understand the nature of the project
- Real time review of capital expenditures to optimize available deductions and tax credits

#### Outcome

- Net present value tax shield benefit of approximately \$7 million from additional tax deductions through identification of:
  - Clean energy property
  - General equipment
  - Communal areas
  - Building technology
- Clean technology investment tax credit opportunities of over \$2 million



# **Dharmesh Gandhi**

Partner, Incentives and Capital Investment | EY Canada

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Dharmesh leads the Central Quantitative Services Practice and has 19 years of experience working with companies across Canada. He is responsible for strategy, operations, client relations, quality, risk management and knowledge sharing related to incentives and capital investment matters across the central region and nationally.

He works closely with his clients as a trusted business advisor, providing resultsoriented advice and delivering the connections and insight required to access government grants and incentives. He specializes in the SR&ED program, business grants and sustainability credits for Canadian and multi-national corporations.

Dharmesh's technical expertise is broadened by his focus on private and growth market boards. He has an in depth understanding of industry trends and state of the art technological advancements across a wide variety of industries.



# Martin McLaughlin

Partner, Incentives and Capital Investments | EY Canada

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Martin is a partner with over 20 years of experience in the incentives space helping companies in both the public and private sector across Canada.

He is the Canadian Capital Asset Review leader, specializing in fixed asset analysis, cost segregation and incentives related to capital expenditures. He works with companies to identify investments that are eligible for tax credits, incentive opportunities, accelerated tax depreciation, and immediately deductible costs around capital asset spending on new or existing facilities, sustainability and emissions reduction initiatives, equipment implementation, soft costs and software costs.

Martin works closely with clients as a trusted business advisor to help access funding to transform their operations, fund growth, and ensure they are sustainable and future ready.



# Julia Bolpois

Senior Manager, SR&ED and Business Tax Incentives | EY Canada

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Julia brings 18 years of expertise in filing tax credit and incentive applications. As a dedicated advisor, she prioritizes exceptional service to clients by developing and executing government program strategies that enable companies to maximize their return on investment in growth, transformation, and innovation projects.

Her role involves helping companies save time and fully leverage financial opportunities across various sectors, including sustainable development and environmental solutions, plant and process digitalization and modernization, as well as intellectual property and workforce expansion.

Julia's key responsibilities encompass reviewing government incentives for investment projects, preparing strategic incentives roadmaps, crafting applications that align with program criteria and governmental priorities, compiling supporting documentation, and liaising with government officials.

Additionally, she assists companies in identifying assets eligible for tax credits and incentive opportunities related to capital asset expenditures, which includes investments in new or existing facilities, decarbonization and emissions reduction initiatives, equipment implementation, and other relevant project costs.



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