



Siwei Chen

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Siwei is a corporate tax partner specializing in both domestic and international contexts. With a wealth of experience across various facets of corporate tax, her expertise encompasses:

- Advising on major purchase, sale, and takeover transactions.
- Ensuring optimal tax structuring in corporate reorganizations.
- Guiding clients through cross-border corporate transactions, managing and coordinating tax complexities across multiple jurisdictions.
- Structuring financing arrangements tailored to meet the unique needs and objectives of each client.
- Designing tax structures for non-residents conducting business in Canada, providing strategic solutions to facilitate smooth operations in the Canadian market.

Siwei frequently presents on tax topics and authors tax articles. She has taken on leadership roles in the tax community such as founding a chapter of Ladies of Tax in Calgary, the steering committee for the Canadian Tax Foundation Young Practitioners, and the Young IFA Network (YIN) Committee.

Experience

- Advised on **transfer pricing** notices of objection and mutual agreement procedure (MAP) applications involving a multi-million-dollar adjustment for a **multinational client in the energy sector**.
- **TBC Corporation** on its sale of Midas, including **Midas Canada**, to Mavis Tire Express Services Corp.
- **White Water Management Ltd.** and its majority shareholders on the sale of Whitewater and its subsidiary, **Catalyst Production Systems**, to Hillcore Group, a leading Canadian investment and advisory firm.
- **Matson, Driscoll & Damico**, a leading international forensic accounting firm, on its sale to Davies.
- **Occidental Petroleum Corp.** in the acquisition of Carbon Engineering for US\$1.1 billion.
- **Pan American Silver Corp. (PAAS)**, in its US\$4.8 billion acquisition of Yamana Gold Inc. shares and spinout of Canadian assets to Agnico-Eagle Mines Limited by way of Plan of Arrangement.
- **POSCO Canada Limited**, in the restructuring of their interest in the Greenhills and Elk Valley coal mines in southeastern British Columbia in exchange for common and preferred shares of Elk Valley Resources Inc. (EVR) and a gross revenue royalty on steelmaking coal. This transaction was part of the larger restructuring of **Teck Resources Limited**, into two independent, publicly-listed companies: Teck Metals Corp. and EVR.
- **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.
- Advising international private equity funds on the acquisition of Canadian businesses.
- Numerous public and private corporations on share purchase and asset purchase transactions.

Insights & Events

- Speaker, "Current Topics in Cross-Border M&A," 2025 IFA Canada International Tax Conference, May 2025
- Co-Presenter, "Convertible Debentures," Canadian Petroleum Tax Society, May 2025
- Author, "Duties and deductions in Canada and the U.S.: the taxing truth about tariffs," International Bar Association website, April 2025
- Author, ["Price points and pressure points: multinationals' transfer pricing in practice during a time of uncertainty."](#) International Bar Association website, April 2025
- Autrice, « Taxes and tariffs: Can you deduct the duty? », article de BLG, avril 2025
- Autrice, « Carrot and stick: How Bill 32 may decrease proposed tax savings in Alberta Budget 2025 », article de BLG, mars 2025
- Autrice, « Le prix est-il juste? Rôle des prix de transfert dans les chaînes d'approvisionnement des multinationales », article de BLG, mars 2025
- Co-Author, "CRA Reverses Long Standing View on Cross-Boarder Convertible Debentures," Corporate Finance, 2025
- Autrice, « Résidents étrangers qui travaillent au Canada : quelles incidences fiscales? », article de BLG, avril 2024
- Co-Presenter, "Due Diligence Reviews – Two Perspectives," Canadian Tax Foundation Young Practitioner, February 2023.
- Author, ["Getting ready for EIFEL rules: Part two."](#) The Lawyer's Daily, January 2023.
- Author, ["Getting ready for EIFEL rules."](#) The Lawyer's Daily, January 2023.
- Autrice, « Préparation en vue des nouvelles règles de RDEIF au Canada », article de BLG, janvier 2023
- Author, "CRA Clarifies its Concession on Earnout Requirements," Corporate Finance, Federated Press Volume XXV, No. 4, 2022

- Autrice, « Mise à jour économique de l'automne 2022 – Aider les Canadiens et les Canadiennes et lutter contre l'inflation », article de BLG, novembre 2022
- Autrice, « Tax Court of Canada: maximum price not sufficient to create reverse earn-out », article de BLG, octobre 2022
- Speaker, "Campaign Promises and Tax Policy", Canadian Bar Association (Taxation Section), October 12, 2021.
- Speaker, "Federal Election: From Promises to Reality?", CPTS Fall Lecture Series, September 29, 2021.
- Autrice, « Same, same but different: U.S. business and the 2021 Canadian election », article de BLG, septembre 2021
- Speaker, "Income and Commodity Tax Measures from the Recent Federal Budget," Tax Executive Institute – Calgary Branch, March 20, 2021.
- Presentation, "A Primer on the Process and Purpose of Tax Due Diligence," Canadian Bar Association (Tax Non-Specialist Section), February 4, 2021.
- Co-author, "[Federal Court of Appeal upholds application of anti-avoidance rule to limited partner \(Part II\)](#)," *The Lawyer's Daily*, November 2020.
- Co-author, "[Federal Court of Appeal upholds application of anti-avoidance rule to limited partner](#)," *The Lawyer's Daily*, November 2020
- Autrice, « FCA confirms GAAR applies to limited partner capital dividend tax plan », article de BLG, octobre 2020
- Autrice, « U.S. releases anti-hybrid regulations », article de BLG, mai 2020

Beyond Our Walls

Professional Involvement

- Member, Law Society of Alberta
- Member, Canadian Tax Foundation
- Member, International Fiscal Association (IFA)
- Member, American Bar Association
- Member, International Bar Association
- Member, Canadian Bar Association – Taxation Law Section
- Member, CPTS
- Member, Calgary Bar Association

Community Involvement

- Member, Ladies of Tax, Calgary (2017-Present)
- Co-Chair, BLG United Way Campaign (2022)
- Secretary, Marda Loop Communities Association (2021 - 2023)
- Director (Sports and Recreation Committee Chair), Marda Loop Communities Association (2019 - 2021)
- Steering Committee, Canadian Tax Foundation Young Practitioners (2022 - 2023)
- Committee Member, Young IFA Network (YIN) Canada Committee (2022 – 2023)
- Steering Committee and Women of IFA Network (WIN) Liaison, Young IFA Network (YIN) Canada (2022 - 2023)

Bar Admission & Education

- Alberta, 2016
- JD, Université de l'Alberta, 2015
- B.Sc. (with Distinction), Université de l'Alberta, 2012

BLG | Vos avocats au Canada

Borden Ladner Gervais S.E.N.C.R.L., S.R.L. (BLG) est le plus grand cabinet d'avocats canadien véritablement multiservices. À ce titre, il offre des conseils juridiques pratiques à des clients d'ici et d'ailleurs dans plus de domaines et de secteurs que tout autre cabinet canadien. Comptant plus de 725 avocats, agents de propriété intellectuelle et autres professionnels, BLG répond aux besoins juridiques d'entreprises et d'institutions au pays comme à l'étranger pour ce qui touche les fusions et acquisitions, les marchés financiers, les différends et le financement ou encore l'enregistrement de brevets et de marques de commerce.

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