

**Part IV Tax**

(30) That for the purposes of the Part IV tax on dividends received after April 19, 1983, other than dividends declared on or before that date, control of a payer corporation be determined without regard to any right referred to in paragraph 251(5)(b) of the Act.

**Special Recovery  
Share-Purchase Tax  
Credit**

(31) That for the 1983 and subsequent taxation years,

(a) a share-purchase tax credit be provided equal to the designated amount on any qualifying share acquired by a taxpayer who is the first registered holder thereof, other than a trader or dealer in securities, and, where the purchaser is a pension plan or other tax-exempt person described in paragraphs 149(1)(c) to (y) of the Act, the credit be refundable,

(b) any share-purchase tax credit earned by a taxpayer reduce the adjusted cost base of the share on which it is earned,

(c) the issuer of a qualifying share be required to pay a special tax equal to the amount designated by it in respect of the share, and

(d) the special tax be refundable to an issuer in a taxation year to the extent of any unclaimed share-purchase tax credit earned by it in the year and its investment tax credit earned after April 19, 1983 that was unclaimed at the end of the year

and for the purposes of this paragraph, "designated amount" means the amount designated by an issuing corporation in respect of a qualifying share not exceeding 25% of the consideration for which the share was issued, and "qualifying share" means a share, other than a preferred share, of a taxable Canadian corporation issued after June 30, 1983 and before 1987, but does not include a share issued subject to a right or obligation to be redeemed, acquired, cancelled or converted for an amount other than its fair market value, or a share which may reasonably be expected to be redeemed, acquired, cancelled or converted within 2 years of its date of issue.