TORYS

MID-LEVEL TAX ASSOCIATE, TORONTO

Torys LLP is a highly respected international business law firm with offices in Toronto, New York, Calgary, Montréal and Halifax. We focus on maintaining long-term relationships with Canadian and international clients who demand the best advice and service from their outside counsel. We believe that our continuing success over many years has come from adherence to our core values of excellence, client service, collaboration, long-term thinking and utmost professionalism and integrity. Dedication to professional excellence and outstanding client service is Torys' hallmark. Of equal importance is our commitment to maintaining a collegial working environment — one that brings together individuals with diverse backgrounds, personalities and styles in an atmosphere of friendship and team spirit. As a Torys employee, you will enjoy both an exciting, fast-paced work environment and a supportive, collegial and team-based culture. At Torys, we take pride in our ability to attract and retain individuals who excel in their respective fields. We do this by providing stimulating work and learning and development opportunities, as well as a competitive compensation and benefits package.

Position Overview

We are currently looking for a mid level tax associate to join our dynamic tax practice. Torys' Tax Practice ranks among the best in Canada, with the expertise to support the effective execution of our clients' most sophisticated goals. Our team approach integrates the firm's leading skills from across our practice areas. including M&A, competition and foreign investment review, executive compensation and benefits, real estate, intellectual property and securities. We represent large multinational businesses, domestic public and private companies, and financial institutions, including banks, insurance companies and trust companies. We also represent issuers and sponsors of private equity investment funds and superannuated pension funds, and assist venture capital investors, start-up companies and mature businesses. Through our Canadian and New York offices, we advise clients in the planning and structuring of tax matters for cross-border and international transactions. Torys' tax controversy and litigation lawyers have experience in dealing with all levels of tax authorities and with all phases of tax controversy, from the planning and implementation of specific transactions to tax filings, initial audits, assessments and appeals. In our transfer pricing practice, we work closely with clients to review risks and exposures before an audit happens. and we guide clients through best practices and managing documentation and compliance during an audit and dispute resolution process. Sales and commodity tax considerations are evaluated as part of our tax planning, tax advisory and tax controversy practices. The candidate will get extensive training and mentoring from a team of lawyers.

SKILLS & EXPERIENCE

The ideal candidate will have:

- 4 to 6 years of tax law experience;
- the ability to evaluate and assess complicated tax issues and research and analyze applicable tax law and matters;
- experience with tax planning for mergers, acquisitions and reorganizations, the structuring of private and public investment and advising on tax matters related to corporate financings;
- experience working on international tax matters, such as treaty interpretation, withholding tax, foreign tax credits, the foreign affiliate regime and transfer pricing;
- experience drafting tax memoranda and opinions;
- experience in applying for and pursuing advance income tax rulings and technical interpretations;
- some experience with tax advocacy, including litigation and dealing with tax authorities:
- excellent communication, interpersonal and drafting skills;
- the ability to juggle and take primary responsibility for multiple files;
- a positive attitude, a team orientation, an exceptional service ethos and a demonstrated work ethic; and
- · excellent academic credentials.

All qualified applicants must be members in good standing with the Law Society of Upper Canada.

Interested candidates should forward their resume in confidence to Kimberly Sheldrake-Head at ksheldrake@torys.com. We foster an inclusive and accessible environment and are committed to providing support to applicants and firm members with disabilities. If you require immediate accommodation at any time during the recruitment process, please contact Kimberly Sheldrake-Head, Senior Manager, Professional Resources.