The purpose of this article is to posit an approach to the classification of foreign business entities based on a determination of whether the entity is a “corporation”/“société” for Canadian tax purposes. The authors begin by reviewing the background to and setting out their views on the relevance of foreign entity classification. They then focus on the notion of corporation/société in Canadian tax law and expound their views on the proper common meaning of these terms in the English and French versions of the relevant statutes. Finally, building on this analysis, the authors propose an approach to foreign entity classification that they believe to be fully consistent with the scheme and purpose of Canadian tax law and with an often-overlooked Tax Appeal Board decision on point.

**KEYWORDS:** CORPORATIONS • PARTNERSHIPS • CLASSIFICATIONS • ENTITY • HYBRIDS