

CANADA

TAXATION

TREATY SERIES 1989 No. 31 REÇU DES TRAITÉS

**CONVENTION BETWEEN CANADA AND ITALY FOR THE AVOIDANCE  
OF DOUBLE TAXATION WITH RESPECT TO TAXES ON INCOME  
AND FOR THE PREVENTION OF FISCAL EVASION**

The Government of Canada and the Government of Italy,

Desiring to conclude a Convention for the avoidance of double taxation with respect to taxes on income and for the prevention of fiscal evasion,

Have agreed as follows:

ARTICLE I

*Personal Scope*

This Convention shall apply to persons who are residents of one or both of the Contracting States.

ARTICLE II

*Taxes Covered*

1. This Convention shall apply to taxes on income imposed on behalf of each Contracting State, irrespective of the manner in which they are levied.

2. There shall be regarded as taxes on income all taxes imposed on total income or on elements of income, including taxes on gains from the alienation of movable or immovable property, taxes on the total amounts of wages or salaries paid by enterprises, as well as taxes on capital appreciation.

3. The existing taxes to which the Convention shall apply are, in particular:

(a) in the case of Canada:

the income taxes imposed by the Government of Canada, (hereinafter referred to as "Canadian tax");

(b) in the case of Italy:

(i) the individual income tax (imposta sul reddito delle persone fisiche);

(ii) the corporate income tax (imposta sul reddito delle persone giuridiche);

(iii) the local income tax (imposta locale sui redditi),

even when deducted at source; (hereinafter referred to as "Italian tax").