

- (i) is a national of that State; or
- (ii) did not become a resident of that State solely for the purpose of rendering the services.

2. The provisions of paragraph 1 shall not apply to remuneration in respect of services rendered in connection with a business carried on by a Contracting State or a political subdivision or a local authority thereof.

#### Article 20

##### Students

Payments which a student, apprentice or business trainee who is, or was immediately before visiting a Contracting State, a resident of the other Contracting State and who is present in the first-mentioned State solely for the purpose of that individual's education or training receives for the purposes of that individual's maintenance, education or training shall not be taxed in that State, provided that such payments arise from sources outside that State.

#### Article 21

##### Other Income

1. Subject to the provisions of paragraph 2, items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Convention shall be taxable only in that State.

2. However, if such income is derived by a resident of a Contracting State from sources in the other Contracting State, such income may also be taxed in the State in which it arises, and according to the law of that State. However, in the case of income from an estate or trust, the tax so charged shall, provided that the income is taxable in the Contracting State of which the beneficial owner is a resident, not exceed 15 per cent of the gross amount of the income.

### IV. METHODS FOR PREVENTION OF DOUBLE TAXATION

#### Article 22

##### Elimination of Double Taxation

1. In the case of Canada, double taxation shall be avoided as follows:

- a) Subject to the existing provisions of the law of Canada regarding the deduction from tax payable in Canada of tax paid in the territory outside Canada and to any subsequent modification of those provisions -  
- which shall not affect the general principle hereof -- and unless a greater deduction or relief is provided under the laws of Canada, tax payable in Mexico on profits, income or gains arising in Mexico shall be deducted from any Canadian tax payable in respect of such profits, income or gains.