CONVENTION

BETWEEN

CANADA

AND

FINLAND

FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME

THE GOVERNMENT OF CANADA and THE GOVERNMENT OF FINLAND.

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

HAVE AGREED as follows:

ARTICLE 1

Persons Covered

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

ARTICLE 2

Taxes Covered

- 1. The existing taxes to which this Convention shall apply are:
 - a) in the case of Canada: the income taxes imposed by the Government of Canada under the *Income Tax Act*, (hereinafter referred to as "Canadian tax"); and
 - b) in the case of Finland:
 - (i) the state income taxes;
 - (ii) the corporate income tax;