ARTICLE 2

Taxes Covered

1. This Agreement shall apply to the following taxes imposed by the Parties:

(a) in the case of the Isle of Man, taxes on income or profits;

(b) in the case of Canada, taxes on income and on capital imposed or administered by the Government of Canada.

2. This Agreement shall also apply to any other taxes if the Parties so agree in an exchange of letters. The competent authority of each Party shall notify the other of substantial changes in laws which may affect the obligations of that Party pursuant to this Agreement.

ARTICLE 3

Definitions

1. In this Agreement:

(a) "Canada", used in a geographical sense, means:

(i) the land territory, air space, internal waters and territorial sea of Canada;

(ii) the exclusive economic zone of Canada, as determined by its domestic law, consistent with Part V of the *United Nations Convention on the Law of the Sea* of 10 December 1982 ("UNCLOS"); and

(iii) the continental shelf of Canada, as determined by its domestic law, consistent with Part VI of the UNCLOS;

(b) "Isle of Man", used in a geographical sense, means the island of the Isle of Man, including its territorial sea, in accordance with international law;

(c) "company" means any body corporate or any entity that is treated as a body corporate for tax purposes;