

- (b) 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").
2. The Convention shall apply also to any identical or substantially similar taxes that are imposed after the date of signature of the Convention in addition to, or in place of, the existing taxes. The competent authorities of the Contracting States shall notify each other of any significant changes that have been made in their respective taxation laws.

### ARTICLE 3

#### General Definitions

1. For the purposes of this Convention, unless the context otherwise requires:
- (a) the term "Korea" means the Republic of Korea, and when used in a geographical sense, means all the territory of the Republic of Korea, including its territorial sea, air space, and any other area adjacent to the territorial sea of the Republic of Korea which, in accordance with international law and the laws of Korea, is an area within which the sovereign rights or jurisdiction of the Republic of Korea with respect to the waters, the sea-bed and subsoil, and their natural resources may be exercised;
  - (b) the term "Canada", used in a geographical sense, means all the territory of Canada, including its territorial sea and air space over the territory and the territorial sea, and any other area adjacent to the territorial sea of Canada which, in accordance with its legislation and with international law, is an area within which the sovereign rights or jurisdiction of Canada with respect to the waters, sea-bed and subsoil, and their natural resources, may be exercised;
  - (c) the terms "a Contracting State" and "the other Contracting State" mean Korea or Canada, as the context requires;
  - (d) the term "tax" means Canadian tax or Korean tax, as the context requires;