

I. SCOPE OF THE AGREEMENT

ARTICLE 1

Persons Covered

This Agreement shall apply to persons who are residents of one or both of the Parties.

ARTICLE 2

Taxes Covered

1. The existing taxes to which this Agreement shall apply are:
 - (a) in the case of the Hong Kong Special Administrative Region, the taxes imposed by the Government of the Hong Kong Special Administrative Region under the *Inland Revenue Ordinance* ("Hong Kong Special Administrative Region tax");
 - (b) in the case of Canada, the taxes imposed by the Government of Canada under the *Income Tax Act* ("Canadian tax").
2. This Agreement shall apply also to any identical or substantially similar taxes that are imposed after the date of signature of this Agreement in addition to, or in place of, the existing taxes. The competent authorities of the Parties shall notify each other of any significant changes that have been made in their taxation laws.