

- (h) the terms "corporation of one of the Contracting States" and "corporation of the other Contracting State" mean a Canadian corporation or a Japanese corporation, as the context requires:
- (i) the term "Canadian enterprise" means an industrial or commercial enterprise or undertaking carried on by a resident of Canada; and the term "Japanese enterprise" means an industrial or commercial enterprise or undertaking carried on by a resident of Japan;
- (j) the terms "enterprise of one of the Contracting States" and "enterprise of the other Contracting State" mean a Canadian enterprise or a Japanese enterprise, as the context requires;
- (k) (i) the term "permanent establishment" means a fixed place of business in which the business of the enterprise is wholly or partly carried on;
- (ii) the term "permanent establishment" shall include especially:
- (aa) a place of management;
 - (bb) a branch;
 - (cc) an office;
 - (dd) a factory;
 - (ee) a workshop;
 - (ff) a mine, quarry or other place of extraction of natural resources;
 - (gg) a building site or construction or assembly project which exists for more than twelve months;
- (iii) the term "permanent establishment" shall not be deemed to include:
- (aa) the use of facilities solely for the purpose of storage, display or delivery of goods or merchandise belonging to the enterprise;
 - (bb) the maintenance of a stock of goods or merchandise belonging to the enterprise solely for the purpose of storage, display or delivery;
 - (cc) the maintenance of a stock of goods or merchandise belonging to the enterprise solely for the purpose of processing by another enterprise;
 - (dd) the maintenance of a fixed place of business solely for the purpose of purchasing goods or merchandise, or for collecting information, for the enterprise;
 - (ee) the maintenance of a fixed place of business solely for the purpose of advertising, for the supply of information, for scientific research or for similar activities which have a preparatory or auxiliary character, for the enterprise;
- (iv) a person acting in one of the Contracting States on behalf of an enterprise of the other Contracting State—other than an agent of an independent status to whom subparagraph (v) applies—shall be deemed to be a permanent establishment in the first-mentioned Contracting State if
- (aa) he has, and habitually exercises in that first-mentioned Contracting State, an authority to conclude contracts in the name of the enterprise, unless his activities are limited to the purchase of goods or merchandise for the enterprise, or
 - (bb) he maintains in that first-mentioned Contracting State a stock of goods or merchandise belonging to the enterprise from which he regularly fills orders on behalf of the enterprise;