

## I. SCOPE OF THE CONVENTION

### 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. This Convention shall apply to taxes on income, and on capital imposed on behalf of a Contracting State, irrespective of the manner in which they are levied.
2. There shall be regarded as taxes on income and on capital all taxes imposed on total income, on total capital, or on elements of income or of capital, including taxes on gains from the alienation of movable or immovable property, taxes on the total amounts of wages or salaries paid by enterprises, as well as taxes on capital appreciation.
3. The existing taxes to which the Convention shall apply are, in particular,
  - (a) in the case of Canada, the taxes imposed by the Government of Canada under the *Income Tax Act* (hereinafter referred to as "Canadian tax"); and
  - (b) in the case of Colombia,
    - (i) Tax on Income, and Complementary Taxes (Impuesto sobre la Renta y Complementarios); and
    - (ii) the National Tax on Capital;(hereinafter referred to as "Colombian Tax").
4. 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 which have been made in their respective taxation laws.