

- (ii) the income tax (pajak pendapatan);
 - (iii) the capital tax (pajak kekayaan);
 - (iv) the tax on interest, dividend and royalties (pajak atas bunga, dividen dan royalty),
- (hereinafter referred to as "Indonesian tax").

It is understood that "Menghitung Pajak Orang" (M.P.O.) is included in the company tax and the income tax.

4. The Convention shall also apply to any identical or substantially similar taxes on income and to taxes on capital which are imposed by either Contracting State after the date of signature of this Convention in addition to, or in place of, the existing taxes. The Contracting States shall notify each other of any substantial changes which have been made to their respective taxation laws.

CHAPTER II

DEFINITIONS

ARTICLE 3

General Definitions

1. In this Convention, unless the context otherwise requires:

- (a) (i) the term "Canada" comprises the territory of Canada as defined in its laws and parts of the continental shelf and adjacent waters, over which Canada has sovereignty, sovereign rights or other rights in accordance with international law;
- (ii) the term "Indonesia" comprises the territory of the Republic of Indonesia as defined in its laws and parts of the continental shelf and adjacent seas, over which the Republic of Indonesia has sovereignty, sovereign rights or other rights in accordance with international law;
- (b) The terms "a Contracting State" and "the other Contracting State" mean, as the context requires, Canada or Indonesia;
- (c) The term "person" includes an individual, a company, a partnership, an estate, a trust or any other body of persons;
- (d) The term "company" means any body corporate or any other entity which is treated as a body corporate for tax purposes; in French, the term "société" also means a "corporation" within the meaning of Canadian law;
- (e) The terms "enterprise of a Contracting State" and "enterprise of the other Contracting State" mean respectively an enterprise carried on by a resident of a Contracting State and an enterprise carried on by a resident of the other Contracting State;
- (f) The term "competent authority" means: