

## 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 each 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, 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");

(b) in the case of Gabon:

the company tax and the flat rate minimum tax,

the tax on income of individuals,

the supplementary tax,

the tax on income from movable capital,

including any withholding tax, any prepayment or advance payment with respect to the aforesaid taxes,

(hereinafter referred to as "Gabonese tax").