

ARTICLE 18

Government Service

1. (a) Salaries, wages and other similar remuneration, other than a pension, paid by the Government of a Party or of a political subdivision or of a local authority to an individual in respect of services rendered to that Party or subdivision or authority shall be taxable only in that Party.
 - (b) However, such salaries, wages and other similar remuneration shall be taxable only in the other Party if the services are rendered in that Party and the individual is a resident of that Party who:
 - (i) in the case of the Hong Kong Special Administrative Region, has the right of abode therein and in the case of Canada, is a national thereof, or
 - (ii) did not become a resident of that Party solely for the purpose of rendering the services.
2. The provisions of Articles 14 (Income from Employment), 15 (Directors' Fees) and 16 (Entertainers and Sportspersons) shall apply to salaries, wages and other similar remuneration in respect of services rendered in connection with a business carried on by the Government of a Party or of a political subdivision or of a local authority.

ARTICLE 19

Students

Payments which a student who is, or was immediately before visiting a Party, a resident of the other Party and who is present in the first-mentioned Party solely for the purpose of that individual's education receives for the purpose of that individual's maintenance or education shall not be taxed in that Party, provided that such payments arise from sources outside that Party.