

other Contracting State and who is present in the first-mentioned Contracting State solely for the purpose of his education or training shall not be taxed in that first-mentioned State in respect of remittances received by him from abroad for the purpose of his maintenance, education or training.

ARTICLE XXI

Income not Expressly Mentioned

1. Subject to the provisions of paragraphs 2 and 3 of this Article, items of income of a resident of a Contracting State which are not expressly mentioned in the foregoing Articles of this Convention shall be taxable only in that Contracting State.

2. However, if such income is derived by a resident of a Contracting State from sources in the other Contracting State, such income may also be taxed in the State in which it arises, and according to the law of that State.

3. Notwithstanding the provisions of paragraph 2, in the case of alimony or other similar payments and in the case of income from an estate or trust derived from sources in Canada by a resident of Pakistan who is subject to tax in respect thereof, the tax charged in Canada shall not exceed 15 per cent of the gross amount of the payments or the income, as the case may be.

Chapter IV

METHODS FOR ELIMINATION OF DOUBLE TAXATION

ARTICLE XXII

1. In the case of Canada, double taxation shall be avoided as follows:

- (a) Subject to the existing provisions of the law of Canada regarding the deduction from tax payable in Canada of tax paid in a territory outside Canada and to any subsequent modifications of those provisions (which shall not affect the general principle hereof), and unless a greater deduction or relief is provided under the laws of Canada, tax payable in Pakistan in accordance with this Convention on profits, income or gains arising in Pakistan shall be deducted from any Canadian tax payable in respect of such profits, income or gains;