

2. The Agreement shall apply also to any identical or substantially similar taxes which are imposed after the date of signature of the Agreement in addition to, or in place of, the taxes referred to in paragraph 1. The competent authorities of the Contracting States shall notify each other of any significant changes which have been made in their respective taxation laws.

### ARTICLE 3

#### General Definitions

1. In this Agreement, unless the context otherwise requires:
  - (a) the term "Canada" used in a geographical sense, means the territory of Canada, including:
    - (i) any area beyond the territorial seas of Canada which, in accordance with international law and the laws of Canada, is an area within which Canada may exercise rights with respect to the seabed and subsoil and their natural resources;
    - (ii) the seas and airspace above every area referred to in subparagraph (i) in respect of any activity carried on in connection with the exploration for or the exploitation of the natural resources referred to therein;
  - (b) the term "Russian Federation - Russia", used in a geographical sense, means its territory, including its internal bodies of water, territorial waters in the sea and the air space above them, as well as the continental shelf and the exclusive economic zone, where the Russian Federation has sovereign rights and exercises jurisdiction as defined by federal law and the rules of international law. The names "Russian Federation" and "Russia" are synonymous;
  - (c) the terms "a Contracting State" and "the other Contracting State" mean, as the context requires, Canada or the Russian Federation;
  - (d) the term "person" includes an individual, a trust, a company, a partnership and any other body of persons;
  - (e) the term "company" means any body corporate or any entity which is treated as a body corporate for tax purposes;
  - (f) the term "competent authority" means:
    - (i) in the case of Canada, the Minister of National Revenue or his authorized representative;
    - (ii) in the case of the Russian Federation, the Ministry of Finance or its authorized representative;
  - (g) the term "international traffic" means any transport by a ship or aircraft except when the ship or aircraft is operated solely between places in a Contracting State.
2. As regards the application of the Agreement by a Contracting State any term not defined therein shall, unless the context otherwise requires, have the meaning which it has under the law of that State concerning the taxes to which the Agreement applies.