

- (j) the term “national”, in relation to a Contracting State, means:
  - (i) any individual possessing the nationality or citizenship of that Contracting State, and
  - (ii) any legal person, partnership or association deriving its status as such from the laws in force in that Contracting State; and
- (k) the term “business” includes the performance of professional services and of other activities of an independent character.

2. As regards the application of the Convention at any time by a Contracting State, any term not defined therein shall, unless the context otherwise requires, have the meaning that it has at that time under the laws of that State for the purposes of the taxes to which the Convention applies, any meaning under the applicable tax laws of that State prevailing over a meaning given to the term under other laws of that State.

#### ARTICLE 4

##### Resident

1. For the purposes of this Convention, the term “resident of a Contracting State” means:
  - (a) any person who, under the laws of that State, is liable to tax therein by reason of the person’s domicile, residence, place of management or any other criterion of a similar nature, but does not include any person who is liable to tax in that State in respect only of income from sources in that State; and
  - (b) that State or a political subdivision or local authority thereof or any agency or instrumentality of any government of such State, subdivision or authority.