

4. The Convention shall apply also to any identical or substantially similar taxes which are imposed after the date of signature of this Convention in addition to, or in place of, the existing taxes. The competent authorities of the Contracting States shall notify each other of changes which have been made in their respective taxation laws.

5. The Convention shall not apply to taxes (even when deducted at source) payable on lottery winnings, on premiums other than those on securities, and on winnings from games of chance or skill, competitions and betting.

### ARTICLE III

#### *General Definitions*

1. In this Convention, unless the context otherwise requires:

- (a) the terms "a Contracting State" and "the other Contracting State" mean, as the context requires, Canada or Italy;
- (b) the term "Canada" used in a geographical sense, means the territory of Canada, including any area beyond the territorial waters of Canada which, under the laws of Canada, is an area within which Canada may exercise rights with respect to the sea-bed and sub-soil and their natural resources;
- (c) the term "Italy" means the Italian Republic and includes the zones outside the territorial sea of Italy and in particular the sea-bed and sub-soil adjacent to the territory of the Italian peninsula and islands and situated outside the territorial sea up to the limit provided for under Italian laws allowing exploration and exploitation of the natural resources of such zones;
- (d) the term "person" includes an individual, a company 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; in French, the term "société" also means a "corporation" within the meaning of Canadian law;
- (f) the terms "enterprise of a Contracting State" and "enterprise of the other Contracting State" mean respectively an enterprise carried on by a resident of a Contracting State and an enterprise carried on by a resident of the other Contracting State;
- (g) 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 Italy, the Ministry of Finance;
- (h) the term "nationals" means:
  - (i) all individuals possessing the nationality of a Contracting State;