

THE CANADA-JAMAICA INCOME TAX AGREEMENT

The Government of Canada and the Government of Jamaica, recognizing the desirability of entering into a comprehensive agreement for the avoidance of double taxation with respect to taxes on income but accepting the necessity of postponing the conclusion of any such agreement pending the completion of a tax reform in Canada and Jamaica, have agreed to conclude a limited agreement to avoid double taxation with respect to taxes on certain classes of income as follows:

ARTICLE I

Taxes Covered

(1) The Taxes which are the subject of this Agreement are—

(a) in Canada:

the income taxes, including the old age security tax on income, which are imposed by Canada (hereinafter referred to as "Canadian tax");

(b) in Jamaica:

the income tax, the company profits tax, the additional company profits tax, the investment company profits tax, and surtax which are imposed by Jamaica (hereinafter referred to as "Jamaican tax").

(2) This Agreement shall also apply to any identical or similar taxes which are imposed in addition to, or in place of, the taxes referred to in paragraph (1) by either Contracting State after the date of signature of this Agreement.

ARTICLE II

General Definitions

(1) In this Agreement, unless the context otherwise requires—

- (a) the term "Canada" means the territory of Canada including any area outside the territorial waters of Canada which under the laws of Canada is an area within which the rights of Canada with respect to the sea-bed and sub-soil and their natural resources may be exercised;
- (b) the term "Jamaica" means the Island of Jamaica, the Morant Cays and the Pedro Cays including any area outside the territorial waters of Jamaica which under the laws of Jamaica is an area within which the rights of Jamaica with respect to the sea-bed and sub-soil and their natural resources may be exercised;