

## II. DEFINITIONS

## Article 3

General Definitions

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

- a) the term "Canada" used in a geographical sense, means the territory of Canada;
- b) the term "Mexico" means the United Mexican States;
- c) the terms "a Contracting State" and "the other Contracting State" means, as the context requires, Canada or the United Mexican States;
- d) the term "person" includes an individual, an estate, 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; in French, the term "société" also means a "corporation" within the meaning of Canadian law;
- f) the term "competent authority" means:
  - (i) in the case of Canada, the Minister of National Revenue or the Minister's authorized representative;
  - (ii) in the case of Mexico, the Ministry of Finance and Public Credit;
- g) the term "tax" means Canadian tax or Mexican tax, as the context requires;
- h) the term "national" means:
  - (i) any individual possessing the nationality of a Contracting State;
  - (ii) any legal person, partnership and association deriving its status as such from the laws in force in a Contracting State;
- i) the term "international traffic" with reference to a resident of a Contracting State means any voyage of a ship or aircraft to transport passengers or property (whether or not operated or used by that resident) except where the principal purpose of the voyage is to transport passengers or property between places within the other Contracting State.

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