

### ARTICLE 3

#### Taxes Covered

1. The taxes which are the subject of this Agreement are, in the case of Canada, all existing taxes imposed or administered by the Government of Canada, and in the case of The Bahamas, all existing taxes imposed or administered by the Government of the Commonwealth of The Bahamas.
2. This Agreement shall apply to any identical or substantially similar taxes imposed after the date of signature of this Agreement in addition to, or in place of, the existing taxes. This Agreement shall also apply to such other taxes as may be agreed in an exchange of letters between the Contracting Parties. The competent authorities of the Contracting Parties shall notify each other of any substantial changes to the taxation and related information gathering measures covered by this Agreement within a reasonable time.

### ARTICLE 4

#### Definitions

1. For the purposes of this Agreement, unless otherwise defined:
  - a) the term "Canada", used in a geographical sense, means:
    - (i) the land territory, air space, internal waters and territorial sea of Canada;
    - (ii) the exclusive economic zone of Canada, as determined by its domestic law, consistent with Part V of the *United Nations Convention on the Law of the Sea* of 10 December 1982 (UNCLOS); and
    - (iii) the continental shelf of Canada, as determined by its domestic law, consistent with Part VI of UNCLOS;