

**CONVENTION
BETWEEN
THE GOVERNMENT OF CANADA
AND THE GOVERNMENT OF THE REPUBLIC OF KOREA
FOR THE AVOIDANCE OF DOUBLE TAXATION
AND THE PREVENTION OF FISCAL EVASION
WITH RESPECT TO TAXES ON INCOME**

**THE GOVERNMENT OF CANADA AND THE GOVERNMENT OF THE
REPUBLIC OF KOREA** (hereinafter referred to as the "Contracting States"),

DESIRING to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, have agreed as follows:

ARTICLE 1

Persons Covered

This Convention shall apply to persons who are residents of one or both of the Contracting States.

ARTICLE 2

Taxes Covered

1. The existing taxes to which this Convention shall apply are:
 - (a) in the case of Korea :
 - (i) the income tax;
 - (ii) the corporation tax;
 - (iii) the inhabitant tax; and
 - (iv) the special tax for rural development,
(hereinafter referred to as "Korean tax"); and