2. There shall be regarded as taxes on income all taxes imposed on total income or on elements of income, including taxes on gains from the alienation of any property, taxes on the total amounts of wages or salaries paid by enterprises, as well as taxes on capital appreciation.

3. The existing taxes to which this Convention shall apply are:

(a) in Japan:

(i) the income tax;

(ii) the corporation tax;

(iii) the special income tax for reconstruction;

(iv) the local corporation tax; and

(v) the local inhabitant taxes

(hereinafter referred to as "Japanese tax"); and

(b) in Uruguay:

(i) the tax on business income (Impuesto a las Rentas de las Actividades Económicas);

(ii) the personal income tax (Impuesto a las Rentas de las Personas Físicas);

(iii) the non-residents income tax (Impuesto a las Rentas de los No Residentes); and

(iv) the tax for social security assistance (Impuesto de Asistencia a la Seguridad Social)

(hereinafter referred to as "Uruguayan tax").

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

ARTICLE 3
GENERAL DEFINITIONS

1. For the purposes of this Convention, unless the context otherwise requires:

(a) the term "Japan", when used in a geographical sense, means all the territory of Japan, including its territorial sea, in which the laws relating to Japanese tax are in force, and all the area beyond its territorial sea, including the seabed and subsoil thereof, over which Japan has sovereign rights in accordance with international law and in which the laws relating to Japanese tax are in force;

(b) the term "Uruguay" means the Oriental Republic of Uruguay and, when used in a geographical sense, means the territory of the Oriental Republic of Uruguay on which its tax laws are applied, including the airspace, and the maritime areas under its sovereign rights or jurisdiction in accordance with international law and its domestic law on which its tax laws are applied;

(c) the terms "a Contracting State" and "the other Contracting State" mean Japan or Uruguay, as the context requires;

(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 that is treated as a body corporate for tax purposes;

(f) the term "enterprise" applies to the carrying on of any business;

(g) 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;