

3. Capital represented by ships and aircraft operated by an enterprise of a Contracting State in international traffic and by movable property pertaining to the operation of such ships and aircraft shall be taxable only in that State.

4. All other elements of capital of a resident of a Contracting State shall be taxable only in that State.

ARTICLE 23

Elimination of double taxation

1. In the case of Canada, double taxation shall be avoided as follows:

- (a) subject to the existing provisions of the law of Canada regarding the deduction from tax payable in Canada of tax paid in a territory outside Canada and to any subsequent modification of those provisions - which shall not affect the general principle hereof - and unless a greater deduction or relief is provided under the laws of Canada, tax payable in Armenia on profits, income or gains arising in Armenia shall be deducted from any Canadian tax payable in respect of such profits, income or gains;
- (b) subject to the existing provisions of the law of Canada regarding the allowance as a credit against Canadian tax of tax payable in a territory outside Canada and to any subsequent modification of those provisions - which shall not affect the general principal hereof - where a company which is a resident of Armenia pays a dividend to a company which is a resident of Canada and which controls directly or indirectly at least 10 per cent of the voting power in the first-mentioned company, the credit shall take into account the tax payable in Armenia by that first-mentioned company in respect of the profits out of which such dividend is paid; and
- (c) where, in accordance with any provision of the Convention, income derived or capital owned by a resident of Canada is exempt from tax in Canada, Canada may nevertheless, in calculating the amount of tax on other income or capital, take into account the exempted income or capital.

2. In the case of Armenia, double taxation shall be avoided as follows:

- (a) where a resident of Armenia derives income or owns capital which, in accordance with the provisions of this Convention, may be taxed in Canada, Armenia shall allow:
 - (i) as a deduction from the tax on the income of that resident, an amount equal to the income tax paid in Canada,