

thereafter or has been modified only in minor respects so as not to affect its general character.

3. Where a resident of Israel derives profits, income or gains which, in accordance with the provisions of this Convention, may be taxed in Canada, Israel shall, subject to the provisions of the law of Israel, allow as a deduction from the Israeli tax of that person, an amount equal to the tax paid in Canada. The deduction shall not, however, exceed that part of the tax as computed before the deduction is given, which is appropriate to the profits, income or gains which may be taxed in Canada.

4. For the purposes of this Article, profits, income or gains of a resident of a Contracting State which are taxed in the other Contracting State in accordance with this Convention shall be deemed to arise from sources in that other State.

## VI. SPECIAL PROVISIONS

### ARTICLE XXIV

#### *Non-Discrimination*

1. The nationals of a Contracting State shall not be subjected in the other Contracting State to any taxation or any requirements connected therewith which is other or more burdensome than the taxation and connected requirements to which nationals of that other State in the same circumstances are or may be subjected.
2. Stateless persons resident in one Contracting State shall not be subjected in the other Contracting State to any taxation or any requirement connected therewith which is other or more burdensome than the taxation and connected requirements to which nationals of that State in the same circumstances are or may be subjected.
3. The taxation on a permanent establishment which an enterprise of a Contracting State has in the other Contracting State shall not be less favourably levied in that other State than the taxation levied on enterprises of that other State carrying on the same activities.
4. Nothing in this Article shall be construed as obliging a Contracting State to grant to residents of the other Contracting State any personal allowances, reliefs and reductions for taxation purposes on account of civil status or family responsibilities which it grants to its own residents.
5. Enterprises of a Contracting State, the capital of which is wholly or partly owned or controlled, directly or indirectly, by one or more residents of the other Contracting State, shall not be subjected