



(Translation)

CONSULATE GENERAL OF ITALY

OTTAWA, CANADA, 29 March, 1932.

Mr. SECRETARY OF STATE:

It being the desire of the Government of His Majesty, the King of Italy, to arrive at an agreement for the mutual exemption of the maritime profits from income tax, I have the honour to inform Your Excellency that His Majesty's Government assents to the following obligations:

Article I.—With regard to Italy the Italian Government engages, in accordance with the laws in force in Italy governing the income tax, to exempt from such tax the profits derived from the operation of vessels registered in a Canadian port, owned, or operated by persons, or companies, residing or domiciled in Canada, and not residing or domiciled in Italy, even if the said persons, or companies, should have representatives, agencies, branches, or similar offices in the Kingdom of Italy.

With regard to Canada the Canadian Government engages, in accordance with the laws in force in Canada governing the income tax, to exempt from such tax the profits derived from the operation of vessels flying the Italian flag and registered in a port of the Kingdom of Italy, owned or operated by persons, or companies residing or domiciled in Italy, and not residing or domiciled in Canada, even if the said persons or companies should have representatives, agencies, branches, or similar offices in the Dominion of Canada.

Article II.—It is agreed that the phrase "operation of vessels" shall refer to the business carried on by a ship-owner, and that, in accordance with this definition the word "ship-owner" shall include any and every kind of charterer.

Article III.—It is further agreed that the taxes on maritime profits which, since the 1st of January 1928, have been paid, or are owing to one of the High Contracting Parties by persons, or companies, residing or domiciled in the territory of the other Contracting Party, shall be reimbursed, provided the party interested apply directly therefor, or through the intermediary of a diplomatic or consular agent within one year from the date of the present agreement, or be remitted with the coming into force of the present agreement.

Article IV.—The present agreement shall be valid for the time of one year reckoned from its date, and thereafter, for an indefinite period, with the reservation that it shall become null and void twelve months after its denunciation by either one of the Contracting Parties.

Pray accept Mr. Secretary of State the expression of my highest consideration.

D. ROGERI,
Royal Italian Consul General.

To the Right Honourable
The Secretary of State for
External Affairs,
Ottawa, Canada.