

3. Gains from the alienation of ships or aircraft operated in international traffic by a resident of a Contracting State or movable property pertaining to the operation of such ships or aircraft, shall be taxable only in that State.

4. Gains derived by a resident of a Contracting State from the alienation of

a) shares (other than shares quoted on an approved stock exchange in the other State) forming part of a substantial interest in the capital stock of a company which is a resident of that other Contracting State the value of which shares is derived principally from immovable property situated in that other State; or

b) a substantial interest in a partnership, trust or estate the value of which is derived principally from immovable property situated in that other State,

may be taxed in that other State. For the purposes of this paragraph, the term "immovable property" includes the shares of a company referred to in subparagraph a) or an interest in a partnership, trust or estate referred to in subparagraph b) but does not include any property, other than rental property, in which the business of the company, partnership, trust or estate is carried on.

5. Where a resident of one of the Contracting States alienates property in the course of a corporate amalgamation or division or of a corporate reorganization involving an exchange of shares and profit, gain or income with respect to such alienation is not recognized for the purpose of taxation in that State, if requested to do so by the person acquiring the property, the competent authority of the other Contracting State may agree, subject to terms and conditions satisfactory to such competent authority, to defer the recognition of the profit, gain or income with respect to such property for the purpose of income taxation in that other State until such time and in such manner as may be stipulated in the agreement.

6. Except as provided in Article 12, gains from the alienation of any property, other than that referred to in paragraphs 1, 2, 3 and 4 shall be taxable only in the contracting State of which the alienator is a resident.

7. The provisions of paragraph 6 shall not affect the right of a Contracting State to levy, according to its law, a tax on gains from the alienation of any property derived by an individual who is a resident of the other Contracting State and has been a resident of the first-mentioned State at any time during the six years immediately preceding the alienation of the property.

Article 14

Independent Personal Services

1. Income derived by a resident of a Contracting State in respect of professional services or other activities of an independent character shall be taxable only in that State unless the resident has regularly available a fixed base in the other Contracting State