

eign affiliate and to any subsequent modification of those provisions (which, however, shall not affect the principle hereof) for the purposes of computing Canadian tax, a company which is a resident of Canada shall be allowed to deduct in computing its taxable income any dividend received by it out of the exempt surplus of a foreign affiliate which is a resident of Belgium.

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

V. 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 of a 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 other State in the same circumstances are or may be subjected.

3. When an individual who is a resident of a Contracting State is taxable in the other Contracting State in respect of income mentioned in any of Articles VI, VII, XIII, XIV, XV, XVIII and XIX, the tax of that other State on such income shall, if the individual so elects, be computed at the rate which would be applicable if he were a resident of that other State, taking into account his civil status and family responsibilities and the aggregate of such income. To be admissible, such election must be made in writing within two years from the end of the year in which the income concerned has accrued.

4. 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.

5. Nothing in this Article shall be construed as preventing Belgium:

- (a) from taxing at the rate determined by Belgian law the total profits or income attributable to a permanent establishment