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- 1. An individual who is a resident of Sweden shall be exempt from Canadian tax on profits or remuneration in respect of personal (including professional) services performed within Canada in any taxation year if—
- (a) he is present within Canada for a period or periods not exceeding in the aggregate 183 days during that year, and
- (b) the services are performed for or on behalf of a person resident in Sweden.
- 2. An individual who is a resident of Canada shall be exempt from Swedish tax on profits or remuneration in respect of personal (including professional) services performed within Sweden in any year of assessment if—
  - (a) he is present within Sweden for a period or periods not exceeding in the aggregate 183 days during that year, and
  - (b) the services are performed for or on behalf of a person resident in Canada.
- 3. The provisions of this Article shall not apply to the profits or remuneration of public entertainers such as stage, motion picture or radio artists, musicians and athletes.

### Tello Estate and Anticle XI

- 1. Any pension or annuity derived from sources within Canada by an individual who is a resident of Sweden shall be exempt from Canadian tax.
- 2. Any pension or annuity derived from sources within Sweden by an individual who is a resident of Canada shall be exempt from Swedish tax.
- 3. The term "annuity" means a stated sum payable periodically at stated times, during life or during a specified or ascertainable period of time, under an obligation to make the payments in return for adequate and full consideration in money or money's worth.

## ARTICLE XII de nad negatasbau aray nada

A professor or teacher from one of the territories who receives remuneration for teaching, during a period of temporary residence not exceeding two years, at a university, college or other establishment for further education in the other territory, shall be exempt from tax in that other territory in respect of that remuneration.

#### ARTICLE XIII

A student or business apprentice from one of the territories who receiving full-time education or training in the other territory shall be exempt from tax in that other territory on payments made to him by persons in the first-mentioned territory for the purposes of his maintenance, education of training.

# ARTICLE XIV

A resident of one of the territories shall be exempt in the other territory from any tax on gains from the sale, transfer, or exchange of capital assets.