

State and who is present in the first-mentioned State solely for the purpose of his education or training receives for the purpose of his maintenance, education or training shall not be taxed in that State, provided that such payments arise from sources outside that State.

ARTICLE 21

Other Income

(1) Subject to the provisions of paragraph 2, items of income of a resident of a Contracting State, wherever arising, not dealt in the foregoing Articles of this Convention shall be taxable only in that State.

(2) However, if such income is derived by a resident of a Contracting State from sources in the other Contracting State, such income may also be taxed in the State in which it arises, and according to the law of that State. However, in the case of income from an estate or trust, the tax so charged shall, provided that the income is taxable in the Contracting State in which the recipient resides, not exceed 15 per cent of the gross amount of the income.

IV. METHODS FOR PREVENTION OF DOUBLE TAXATION

ARTICLE 22

Elimination of Double Taxation

(1) In the case of Canada, double taxation shall be avoided as follows:

(a) Subject to the existing provisions of the law of Canada regarding the deduction from tax payable in Canada of tax paid in a territory outside Canada and to any subsequent modification of those provisions — which shall not affect the general principle hereof — and unless a greater deduction or relief is provided under the laws of Canada, tax payable in Egypt on profits, income or gains arising in Egypt shall be deducted from any Canadian tax payable in respect of such profits, income or gains.

(b) Subject to the existing provisions of the law of Canada regarding the determination of the exempt surplus of a foreign affiliate and to any subsequent modification of those provisions — which shall not affect the general principle hereof — for the purpose of computing Canadian tax, a company resident in 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 resident in Egypt.

The terms “foreign affiliate” and “exempt surplus” as used in this Article shall have the meaning which they have for the purposes of paragraphs 95(1)(d) and 113(1)(a) respectively, of the Canadian Income Tax Act.