

deduction shall not, however, exceed that part of the tax on income as computed before the deduction is given, which is appropriate to the income which may be taxed in Canada.

- (b) Where a company resident in Austria owns at least 25 per cent of the share capital of a company resident in Canada, Austria shall, notwithstanding the provision of subparagraph (a) and subject to the provisions of the law of Austria regarding the treatment of intercorporate dividends and to any subsequent modification of those provisions—which shall not affect the general principle hereof—, exempt the dividends received from its taxes on income and the value of shares from its taxes on capital.

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

4. Where a resident of a Contracting State owns capital which, in accordance with Article 22, may be taxed in the other Contracting State, the first-mentioned State shall exempt such capital from tax but may, in calculating tax on the remaining capital of that person, apply the rate of tax which would have been applicable if the exempted capital had not been so exempted.

ARTICLE 24

Non-Discrimination

1. The nationals 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.

2. 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.

3. Nothing in this Article shall be construed as obliging a Contracting State to grant to residents of the other Contracting State any personal allowances, reliefs and reductions for taxation purposes on account of civil status or family responsibilities which it grants to its own residents.

4. In this Article, the term “taxation” means taxes which are the subject of this Convention.