

State) are or may be collected.

Notwithstanding the foregoing, in the event of a final ruling by a court of competent jurisdiction that the application of the provisions of this Convention to the taxation of controlled foreign corporations by the first-mentioned States, the application of the provisions of this Convention to the taxation of controlled foreign corporations is subject to any requirements that may be specified in the Convention, including those that may be specified in the first-mentioned State, shall not be subject to the first-mentioned State, if the provisions of the Convention apply to the taxation of controlled foreign corporations in that State.

4. For purposes of a Contracting State, the amount of the net income of a partnership which is treated as an individual for purposes of the taxation of controlled foreign corporations shall not be less than the amount of such net income which such partnership would have if it were a corporation of that State to which the provisions of this Convention apply.

5. The taxation of a partnership, regardless of whether the net income of such partnership is or may be included in the net income of an individual, shall not be less than the amount of such net income which such partnership would have if it were a corporation of that State to which the provisions of this Convention apply.

6. The taxation of a partnership, regardless of whether the net income of such partnership is or may be included in the net income of an individual, shall not be less than the amount of such net income which such partnership would have if it were a corporation of that State to which the provisions of this Convention apply.

Non-Discrimination

Article 20A

A. SPECIAL PROVISIONS

1. The provisions of this Convention shall not be applied in a manner that would result in the taxation of a resident of a Contracting State in respect of his income from sources in the other Contracting State which is more burdensome than the taxation of a resident of that other State in respect of his income from sources in the first-mentioned State.

2. The provisions of this Convention shall not be applied in a manner that would result in the taxation of a resident of a Contracting State in respect of his income from sources in the other Contracting State which is more burdensome than the taxation of a resident of that other State in respect of his income from sources in the first-mentioned State.

3. The provisions of this Convention shall not be applied in a manner that would result in the taxation of a resident of a Contracting State in respect of his income from sources in the other Contracting State which is more burdensome than the taxation of a resident of that other State in respect of his income from sources in the first-mentioned State.

4. For purposes of a Contracting State, the amount of the net income of a partnership which is treated as an individual for purposes of the taxation of controlled foreign corporations shall not be less than the amount of such net income which such partnership would have if it were a corporation of that State to which the provisions of this Convention apply.

5. The taxation of a partnership, regardless of whether the net income of such partnership is or may be included in the net income of an individual, shall not be less than the amount of such net income which such partnership would have if it were a corporation of that State to which the provisions of this Convention apply.

6. The taxation of a partnership, regardless of whether the net income of such partnership is or may be included in the net income of an individual, shall not be less than the amount of such net income which such partnership would have if it were a corporation of that State to which the provisions of this Convention apply.

7. The taxation of a partnership, regardless of whether the net income of such partnership is or may be included in the net income of an individual, shall not be less than the amount of such net income which such partnership would have if it were a corporation of that State to which the provisions of this Convention apply.

8. The taxation of a partnership, regardless of whether the net income of such partnership is or may be included in the net income of an individual, shall not be less than the amount of such net income which such partnership would have if it were a corporation of that State to which the provisions of this Convention apply.

Non-discrimination

Article 20B

A. DISPOSITIONS SPECIALES

1. Les dispositions de la Convention ne doivent pas être appliquées d'une manière qui entraînerait la taxation d'un résident d'un État contractant en ce qui concerne ses revenus provenant de sources situées dans cet autre État qui est plus onéreuse que la taxation d'un résident d'un autre État contractant en ce qui concerne ses revenus provenant de sources situées dans cet autre État.

2. Les dispositions de la Convention ne doivent pas être appliquées d'une manière qui entraînerait la taxation d'un résident d'un État contractant en ce qui concerne ses revenus provenant de sources situées dans cet autre État qui est plus onéreuse que la taxation d'un résident d'un autre État contractant en ce qui concerne ses revenus provenant de sources situées dans cet autre État.

3. Les dispositions de la Convention ne doivent pas être appliquées d'une manière qui entraînerait la taxation d'un résident d'un État contractant en ce qui concerne ses revenus provenant de sources situées dans cet autre État qui est plus onéreuse que la taxation d'un résident d'un autre État contractant en ce qui concerne ses revenus provenant de sources situées dans cet autre État.