

ARTICLE 7.

In no case shall the treatment accorded by either Contracting Party to Companies of the other be less favourable in respect of any matter whatever than that accorded to the Companies of the most-favoured foreign country.

ARTICLE 8.

No charge shall be imposed and no conditions prescribed by either of the Contracting Parties in respect of transactions with Companies of the other Contracting Party carrying on business in its territories other or more burdensome than the charges or conditions in respect of transactions with national Companies.

ARTICLE 9.

If the law of either Contracting Party does not provide for appeal against the determination by the taxing authority of the percentage referred to in Article 5 the assessment shall, before becoming effective, be communicated to the Company in the usual form and the Company shall have the right in the prescribed period to submit to the Minister of Finance any considerations which it deems relevant and in such a case the Minister, or the Government, as the case may be, after full inquiry and after the Company has been heard, will give a final decision.

No Company shall have the right to contest the determination of the percentage by the taxing authority if it has failed to furnish within the time and in the form prescribed the declarations and particulars required by the taxing authority in order to establish the percentage in accordance with the provisions of this Agreement.

ARTICLE 10.

The present Agreement shall come into force immediately and shall continue in operation until the expiration of twelve months from the date on which either Contracting Party shall have given notice to terminate it.

ARTICLE 11.

The stipulations of the present Agreement shall not be applicable to India or to any of His Britannic Majesty's Self-Governing Dominions, Colonies, Possessions, or Protectorates, unless notice is given by His Britannic Majesty's Representative at Madrid of the desire of His Britannic Majesty that the said stipulations shall apply to any such territory.