

2. Subject to the provisions of Finnish law regarding the elimination of international double taxation (which shall not affect the general principle hereof) double taxation shall be eliminated in Finland as follows:

- a) Where a resident of Finland derives income which, in accordance with the provisions of this Convention, may be taxed in Canada, Finland shall, subject to the provisions of subparagraph b), allow as a deduction from the Finnish tax of that person, an amount equal to the Canadian tax paid under Canadian law and in accordance with the Convention, as computed by reference to the same income by reference to which the Finnish tax is computed.
- b) Dividends paid by a company which is a resident of Canada to a company which is a resident of Finland and which controls directly at least 10 per cent of the voting power in the company paying the dividends shall be exempt from Finnish tax.
- c) Where in accordance with any provision of the Convention income derived by a resident of Finland is exempt from tax in Finland, Finland may nevertheless, in calculating the amount of tax on the remaining income of such resident, take into account the exempted income.

3. For the purposes 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 the Convention shall be deemed to arise from sources in that other State.

ARTICLE 22

Non-Discrimination

1. Nationals of a Contracting State shall not be subjected in the other Contracting State to any taxation or any requirement connected therewith which is 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.