SCHEDULE

AGREEMENT

BETWEEN THE

GOVERNMENT OF CANADA

AND THE

GOVERNMENT OF THE KINGDOM OF DENMARK

FOR THE AVOIDANCE OF

DOUBLE TAXATION

AND THE PREVENTION OF FISCAL EVASION

WITH RESPECT TO

TAXES ON INCOME

The Government of Canada and the Government of the Kingdom of Denmark

Desiring to conclude an Agreement for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income.

Have appointed for that purpose as their respective Plenipotentiaries:

The Government of Canada: The Honourable Walter E. Harris, M.P., Minister of Finance;

The Government of the Kingdom of Denmark:

His Excellency O. Sehested,

Envoy Extraordinary and Minister Plenipotentiary of Denmark in Ottawa;

Who, having exhibited their respective full powers, found in good and due form, have agreed as follows:

ARTICLE I.

- 1. The taxes which are subject to this Agreement are:
- (a) In Canada:

Income taxes, including surtaxes, which are imposed by the Government of Canada (hereinafter referred to as "Canadian tax");