2. The rate of Swedish coupon tax on dividends paid to a resident of Canada shall not exceed 15 per cent.

Notwithstanding the provisions of the foregoing paragraph the Swedish coupon tax on dividends paid to a company which is a resident of Canada by a company resident in Sweden, more than 50 per cent of whose shares which have under all circumstances full voting rights are owned by the former company, shall not exceed 5 per cent.

- 3. The rate of Canadian tax on interest, rents, royalties or similar payments from sources within Canada received by a resident of Sweden shall not exceed 15 per cent.
- 4. The phrase "rents, royalties or similar payments" in paragraph 3 of this Article includes any payment
  - (i) for the use in Canada of property,
- (ii) in respect of an invention used in Canada, or
- (iii) for any property, trade name, design or other thing whatsoever used or sold in Canada.

## ARTICLE VII Offit VI 25000 Fr 21 VIS 151 151

Copyright royalties and other like payments made in respect of the production or reproduction of any literary, dramatic, musical or artistic work (but not including rents or royalties in respect of motion picture films) and derived from sources within one of the territories by a resident of the other territory shall be exempt from tax in that first-mentioned territory.

## valeningen av savel ett IIIV ARTICLE VIII ARTICLE Suna ett ifferetag i den

- 1. Income of whatever nature derived from real property within the territory of Canada (other than income from mortgages or bonds secured by real property but including a royalty paid in respect of any extraction of natural resources) by a resident of Sweden shall be exempt from tax in Sweden.
- 2. Any capital sum derived from sources within one of the territories from the sale of patent rights by a resident of the other territory shall be exempt from tax in that first-mentioned territory.

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- 1. Remuneration (other than pensions) paid by Sweden to an individual for services rendered to Sweden in the discharge of governmental functions shall be exempt from Canadian tax if the individual is a citizen of Sweden.
- 2. Remuneration (other than pensions) paid by Canada to an individual for services rendered to Canada in the discharge of governmental functions shall be exempt from Swedish tax.
- 3. The provisions of this Article shall not apply to payments in respect of services rendered in connection with any trade or business carried on by either of the Contracting Governments for purposes of profit.