

**ARTICLE 21****Elimination of Double Taxation**

1. In the case of Poland, double taxation shall be avoided as follows:
  - (a) where a resident of Poland derives income which, in accordance with the provisions of this Convention may be taxed in Canada, Poland shall, subject to the provisions of sub-paragraph (b) exempt such income from tax;
  - (b) where a resident of Poland derives income or capital gains which, in accordance with the provisions of paragraph 4 of Article 6, Articles 10, 11, 12 or 13 or paragraph 4 of Article 20, may be taxed in Canada, Poland shall allow as a deduction from the tax on the income or capital gains of that resident an amount equal to the tax paid in Canada. Such deduction shall not, however, exceed that part of the tax, as computed before the deduction is given, which is attributable to such income or capital gains derived from Canada;
  - (c) where in accordance with any provision of this Convention, income derived by a resident of Poland is exempt from tax in Poland, Poland may nevertheless, in calculating the amount of tax on the remaining income of such resident, take into account the exempted income;
  - (d) where in accordance with paragraph 6 of Article 10, paragraph 8 of Article 11 or paragraph 8 of Article 12, income derived by a resident of Poland may be taxed in Canada without limitation, subparagraphs (a) and (b) shall not apply.