

ARTICLE V

1. Notwithstanding the provisions of Articles III and IV, profits which a resident of one of the territories derives from operating ships or aircraft shall be exempt from tax in the other territory.

2. The Agreement dated 18th June, 1929 between Canada and Denmark providing for the reciprocal exemption from income tax on earnings derived from the operation of ships shall not have effect for any year or period for which the present Agreement has effect.

ARTICLE VI

1. The rate of Canadian tax on dividends, interest, rents or royalties derived from sources within Canada by a resident of Denmark shall not exceed 15 per cent, unless such income is attributable to a permanent establishment in Canada maintained by such resident of Denmark.

2. Notwithstanding paragraph 1, the rate of Canadian tax on dividends paid to a company which is a resident of Denmark by a company resident in Canada, 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 Danish tax on dividends, interest, rents or royalties derived from sources within Denmark by a resident of Canada shall not exceed 15 per cent, unless such income is attributable to a permanent establishment in Denmark maintained by such resident of Canada.

4. Notwithstanding paragraph 3, the rate of Danish tax on dividends paid to a company which is a resident of Canada by a company resident in Denmark, 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.

ARTICLE VII

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.

ARTICLE VIII

1. Remuneration (other than pensions) paid by one of the Contracting Governments to any individual for services rendered to that Government in the discharge of governmental functions shall be exempt from tax in the territory of the other Contracting Government if the individual is resident in that territory solely for the purpose of rendering these services.

2. 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.