

ARTICLE XI.

1. A pension (including a Government pension) and an annuity, derived from sources within one of the Contracting States by a resident of the other Contracting State, shall be exempt from tax by the former Contracting State.

2. The term "annuity" means a stated sum payable periodically at stated times, during life or during a specified or ascertainable period of time, under an obligation to make the payments in consideration of money paid.

ARTICLE XII.

Where a professor or teacher, who is a resident of one of the Contracting States, is temporarily present in the other Contracting State for the purpose of teaching during a period not exceeding two years at a university, college, school or other educational institution in that other Contracting State, remuneration derived by him for so teaching for that period shall be exempt from tax by that other Contracting State.

ARTICLE XIII.

1. Subject to the provisions of the law of Canada regarding the deduction from tax payable in Canada of tax paid in a country outside Canada, Australian tax paid in respect of income from sources within Australia shall be allowed as a credit against Canadian tax payable in respect of that income.

2. Subject to any provisions of the law of Australia which relate to the allowance of a credit against Australian tax of tax paid in a country outside Australia, Canadian tax paid in respect of income derived by a resident of Australia from sources in Canada shall be allowed as a credit against Australian tax payable in respect of that income.

3. For the purposes of this Article

(a) profits, remuneration or other income in respect of personal (including professional) services performed in one of the Contracting States shall be deemed to be income derived from sources in that Contracting State;

(b) an amount included in taxable income under Division 14 or 15 of Part III of the Income Tax and Social Services Contribution Assessment Act 1936-1957 of the Commonwealth of Australia, or that Act as amended from time to time, or the corresponding provisions of a statute substituted for that Act, shall be deemed to be income derived from sources in Australia; and

(c) the terms "Australian tax" and "Canadian tax" do not include any amount which represents a penalty or interest imposed under the law of either Contracting State relating to the taxes which are the subject of this Agreement.

ARTICLE XIV.

1. The taxation authorities of the Contracting States shall exchange such information (being information available under the respective taxation laws of the Contracting States) as is necessary for carrying out the provisions of this Agreement or for the prevention of fraud or for the administration of statutory provisions against avoidance of the taxes which are the subject of this Agreement.