

the alienation of ships or aircraft operated in international traffic or movable property pertaining to the operation of such ships or aircraft, shall be taxable only in that State.

4. Gains from the alienation of:

- a) shares or other corporate rights in a company, the property of which consists principally of immovable property situated in a Contracting State; or
- b) an interest in a partnership or a trust, the property of which consists principally of immovable property situated in a Contracting State,

may be taxed in that State.

For the purposes of this paragraph the term "immovable property" shall not include property, other than rental property, in which the business of the company, partnership or trust is carried on; however, this term shall include shares or other corporate rights in a company described in subparagraph (a) above and an interest in a partnership or a trust described in subparagraph (b) above.

5. Gains from the alienation of any property other than that referred to in paragraphs 1, 2, 3 and 4, shall be taxable only in the Contracting State of which the alienator is a resident.

6. The provisions of paragraph 5 shall not affect the right of either of the Contracting States to levy, according to its law, a tax on gains derived by an individual who is a resident of the other Contracting State, from the alienation of any property if the alienator:

- a) is a national of the first-mentioned State or was a resident of that State for ten years or more prior to the alienation of the property, and