

6. Where business profits include items of income which are dealt with separately in other Article of the Convention, then the provisions of those Articles shall not be affected by the provisions of this Article.

Article 8

Shipping and Air Transport

1. Profits derived by a resident of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State.

2. Notwithstanding the provisions of paragraph 1 and Article 7, profits derived from the operation of ships or aircraft used principally to transport passengers or goods exclusively between places in a Contracting State may be taxed in that State.

3. The provisions of paragraphs 1 and 2 shall also apply to profits referred to in those paragraphs derived by a resident of a Contracting State from its participation in a pool, a joint business or an international operating agency.

4. In this Article,

- a) the term "profits" includes:
 - (i) profits, net profits, gross receipts and revenues derived directly from the operation of ships or aircraft in international traffic, and
 - (ii) interest on sums generated directly from the operation of ships or aircraft in international traffic provided that such interest is incidental to the operation.
- b) the term "operation of ships or aircraft" in international traffic by a person, includes
 - (i) the charter or rental of ships or aircraft,
 - (ii) the rental of containers and related equipment, and
 - (iii) the alienation of ships, aircraft, containers and related equipment,

by that person provided that such charter, rental or alienation is incidental to the operation by that person of ships or aircraft in international traffic but does not include the transportation by a person by any other means of transport or the provision of accommodation.