

## ARTICLE XV

A student or business apprentice (including, in the Federal Republic, a Volunteer or a Praktikant) from one of the territories, who is receiving full-time education or training in the other territory, shall be exempt from tax in that other territory on payments made to him by persons in the first-mentioned territory for the purposes of his maintenance, education or training.

## ARTICLE XVI

(1) Except in the case of a Non-resident-owned Investment Corporation Canada agrees to allow as a deduction from Canadian tax on any income derived from sources within the Federal Republic that is subject to tax in Canada the amount of Federal Republic tax payable in respect of that income. The amount of the deduction shall not exceed the proportion of the Canadian tax that the income from sources within the Federal Republic that is subject to Federal Republic tax bears to the total income subject to Canadian tax.

(2) In determining its taxes specified in Article I of this Convention the Federal Republic, when dealing with the question of residents of the Federal Republic, shall exclude from the basis upon which its taxes are imposed all income from sources within Canada which, according to Canadian law, and according to this Convention, are not exempt from Canadian tax. The Federal Republic, however, reserves the right to take into account in the determination of its rate of taxation the income excluded in accordance with the provisions of this paragraph. Sentences 1 and 2 shall not apply to income from dividends with the exception of dividends specified in Article VI, Para. (1) and also not for incomes within the meaning of Article VII, Para. (1) and Article VIII, Paras. (2) and (3); the Canadian tax collected on this income shall, however, on application, be allowed as a credit against the Federal Republic tax payable in respect of these incomes computed on the basis of an average rate of taxation.

(3) For the purposes of this Article, profits or remuneration from a profession (including services as a director) or employment performed in one of the territories shall be deemed to be income from sources within that territory, and the services of an individual whose services are wholly or mainly performed in ships or aircraft operated by an enterprise managed and controlled in one of the territories shall be deemed to be performed in that territory.

## ARTICLE XVII

(1) The competent authorities of the contracting States shall upon request 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 Convention or for the prevention of fraud or the like in relation to the taxes which are the subject of this Convention. Any information so exchanged shall be treated as secret and shall not be disclosed to any persons other than those concerned with the assessment and collection of the taxes which are the subject of this Convention. No information shall be exchanged which would disclose any trade, business, industrial or professional secret or any trade process.

(2) In no case shall the provisions of this Article be construed so as to impose upon either of the contracting States the obligation to carry out