

6. Nothing in this Agreement shall prevent:
 - (a) Canada from levying, in addition to the tax on a company which is a resident of Canada, a tax on the earnings of a permanent establishment of a company which is a resident of the Russian Federation but the rate of such tax shall not exceed 10 per cent of such earnings;
 - (b) the Russian Federation from taxing the remittance of earnings by a permanent establishment situated in the Russian Federation of a company which is a resident of Canada but the rate of tax shall not exceed 10 per cent of such remittances.

ARTICLE 11

Interest

1. Interest arising in a Contracting State and paid to a resident of the other Contracting State may be taxed in that other State.
2. However, such interest may also be taxed in the Contracting State in which it arises and according to the laws of that State, but if the recipient is the beneficial owner of the interest the tax so charged shall not exceed 10 per cent of the gross amount of the interest.
3. Notwithstanding the provisions of paragraph 2, interest arising in a Contracting State and paid to a resident of the other Contracting State who is the beneficial owner thereof shall be taxable only in that other State if it is paid:
 - (a) to the Central Bank of that other State;
 - (b) to a resident of that other State in respect of indebtedness of the first-mentioned State or of its state authorities, including local authorities thereof;
 - (c) in respect of a loan made, guaranteed or insured, or a credit extended, guaranteed or insured by an organisation created and wholly owned by the Government of a Contracting State for the purpose of facilitating export; it is understood that, for the purposes of this provision, the Export Development Corporation created under the laws of Canada meets these requirements and that any organisation wholly owned by, and created under the laws of, the Government of the Russian Federation with similar mandate and functions shall, from the date mentioned in an exchange of letters between the competent authorities of the Contracting States, also be considered to meet the requirements of this provision.
4. The term "interest" as used in this Article means income from debt-claims of every kind, whether or not secured by mortgage, and in particular, income from government securities and income from bonds or debentures, including premiums and prizes attaching to such securities, bonds or debentures, as well as income which is subjected to the same taxation treatment as income from money lent by the laws of the State in which the income arises. However, the term "interest" does not include income dealt with in Article 10.