ARTICLE 21

Other Income

1. Subject to the provisions of paragraph 2, items of income of a resident of a Contracting State, wherever arising, not dealt with in the foregoing Articles of this Convention shall be taxable only in that State.

2. However, if such income is derived by a resident of a Contracting State from sources situated in the other Contracting State, such income may also be taxed in the State in which it arises, and according to the laws of that State.