

- (b) if he has a fixed base available to him in the other Contracting State for a period or periods amounting to or exceeding in the aggregate 90 days in the taxation year, but only to the extent that such income is attributable to that fixed base; or
- (c) if the gross amount of such income exceeds five thousand Canadian dollars (\$5,000) or its equivalent in Moroccan dirhams.

## ARTICLE XV

### *Dependent Personal Services*

1. Subject to the provisions of Articles XVI and XVIII, salaries, wages and other similar remuneration derived by a resident of a Contracting State in respect of an employment shall be taxable only in that State unless the employment is exercised in the other Contracting State. If the employment is so exercised, such remuneration as is derived therefrom may be taxed in that other State.

2. Notwithstanding the provisions of paragraph 1, remuneration derived by a resident of a Contracting State in respect of an employment exercised in the other Contracting State shall be taxable only in the first-mentioned State if:

- (a) the recipient is present in the other Contracting State for a period or periods not exceeding in the aggregate 183 days in the calendar year concerned;
- (b) the remuneration is paid by, or on behalf of, an employer who is not a resident of the other State; and
- (c) the remuneration is not borne by a permanent establishment or a fixed base which the employer has in the other State.

3. Notwithstanding the preceding provisions of this Article, remuneration in respect of an employment exercised aboard a ship or aircraft operated in international traffic by an enterprise of a Contracting State, shall be taxable only in that State.

## ARTICLE XVI

### *Directors' Fees*

Directors' fees and similar payments derived by a resident of a Contracting State in his capacity as a member of the board of directors or a similar organ of a company which is a resident of the other Contracting State, may be taxed in that other State.

## ARTICLE XVII

### *Artistes and Athletes*

- 1. Notwithstanding the provisions of Articles VII, XIV and XV;
  - (a) income derived by public entertainers, such as theatre, motion picture, radio or television artistes, and musicians, and by athletes, from their personal activities as such may be taxed in the Contracting State in which these activities are exercised;