

Such deduction in either case shall not, however, exceed that part of the income or capital tax in Latvia as computed before the deduction is given, which is attributable, as the case may be, to the income or the capital which may be taxed in Canada.

- (b) For the purpose of subparagraph (a), where a company that is a resident of Latvia receives a dividend from a company that is a resident of Canada in which it owns at least 10 per cent of its shares having full voting rights, the tax paid in Canada shall include not only the tax paid on the dividend but also the tax paid on the underlying profits of the company out of which the dividend was paid.
2. In the case of Canada, double taxation shall be avoided as follows:
    - (a) subject to the existing provisions of the law of Canada regarding the deduction from tax payable in Canada of tax paid in a territory outside Canada and to any subsequent modification of those provisions -- which shall not affect the general principle hereof -- and unless a greater deduction or relief is provided under the laws of Canada, tax payable in Latvia on profits, income or gains arising in Latvia shall be deducted from any Canadian tax payable in respect of such profits, income or gains;
    - (b) subject to the existing provisions of the law of Canada regarding the taxation of income from a foreign affiliate and to any subsequent modification of those provisions -- which shall not affect the general principle hereof -- for the purpose of computing Canadian tax, a company which is a resident of Canada shall be allowed to deduct in computing its taxable income any dividend received by it out of the exempt surplus of a foreign affiliate which is a resident of Latvia; and
    - (c) where in accordance with any provision of the Convention income derived by a resident of Canada is exempt from tax in Canada, Canada may nevertheless, in calculating the amount of tax on the remaining income of such resident, take into account the exempted income.
3. Tax payable in Latvia by a company which is a resident of Canada in respect of profits attributable to manufacturing and agricultural activities, exploration or exploitation of natural resources and construction or telecommunications projects carried on by it in Latvia shall be deemed to include any amount which would have been payable thereon as Latvian tax for any year but for an exemption from or reduction of tax granted for that year or any part thereof under specific Latvian legislation to promote economic development, to the extent that the exemption or reduction is for a period not in excess of ten years.
4. For the purposes of this Article, profits, income or gains of a resident of a Contracting State which are taxed in the other Contracting State in accordance with this Convention shall be deemed to arise from sources in that other State.