

6. Where a resident of a Contracting State alienates property in the course of a corporate or other organization, reorganization, amalgamation, division or similar transaction and profit, gain or income with respect to such alienation is not recognized for the purpose of taxation in that State, if requested to do so by the person who acquires the property, the competent authority of the other Contracting State may agree, in order to avoid double taxation and subject to terms and conditions satisfactory to such competent authority, to defer the recognition of the profit, gain or income with respect to such property for the purpose of taxation in that other State until such time and in such manner as may be stipulated in the agreement.

7. The provisions of paragraph 5 shall not affect the right of either of the Contracting States to levy, according to its law, a tax on gains derived by an individual who is a resident of the other Contracting State, from the alienation of any property (other than property to which paragraph 8 applies) if the alienator:

- a) is a national of the first-mentioned State or was a resident of that State for ten years or more prior to the alienation of the property; and
- b) was a resident of that first-mentioned State at any time during the five years immediately preceding such alienation.

8. Where an individual ceases to be a resident of a Contracting State and by reason thereof is treated for the purposes of taxation by that State as having alienated property and is taxed in that State and immediately thereafter becomes a resident of the other Contracting State, the other Contracting State may tax gains in respect of the property only to the extent that such gains had not accrued before the individual ceased to be a resident of the first-mentioned State. However, this provision shall not apply to property, any gain from which that other State could have taxed in accordance with the provisions of this Article, other than this paragraph, if the individual had realized the gain before becoming a resident of that other State.