DOMINION OF CANADA

TREATY SERIES, 1929 No. 9

EXCHANGE OF NOTES (June 18, 1929)

recording an Agreement

BETWEEN

CANADA AND DENMARK

providing for the

RECIPROCAL EXEMPTION FROM INCOME TAX OF EARNINGS DERIVED FROM THE OPERATION OF SHIPS

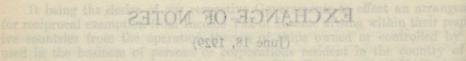


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RECIPROCAL EXEMPTION FROM INCOME TAX

DIAWA F. A. ACLAND FRINTER TO THE RINO'S HOST EXCELLENT MAIRSTY Prom the Secretary of State for External Affairs of Canada to the Consul General of Denmark for Canada

DEPARTMENT OF EXTERNAL AFFAIRS.

OTTAWA, 18th June, 1929.

IR, -it being the desire of our respective Governments to effect an arrange Sir,-It being the desire of our respective Governments to effect an arrange-Ment for reciprocal exemption from Income Tax of income arising within their respective respective countries from the operation therein of ships owned or controlled by and used in the business of persons or corporations resident in the country of the other I he business of persons or corporations resident of Canada the other, I have the honour to inform you that the Government of Canada agrees to the following undertaking:---Denmark the

1. In respect of Canada the Canadian Government undertakes that in accordance with the provisions of the Income War Tax Act the income from the operation of ships owned or operated by persons or corporations resident in Denmark shall not be liable to taxation.

2. In respect of Denmark the Danish Government undertakes that in accordance with the Danish law the income from the operation of ships owned operated in the Danish law the income from the operation of ships owned or operated by persons or corporations resident in Canada shall in like manner be exempt from taxation.

3. It is understood that the expression "operation of ships" means the ³. It is understood that the expression "operation of ships mounds of this definition the purpose of this and that for the purpose of this definition the purpose of this carried on by an owner of ships and that for the purpose of this charterer. definition the expression "owner" includes any charterer.

4. It is agreed that the exemption from income tax on the income derived tion the operation of the aforementioned ships shall be deemed to be effective in respect h respect of the income of fiscal periods ending in the year 1929 and each year thereafter until rescinded by either party giving to the other notice one year in adverse until rescinded by either party giving to there will be the there after until rescinded by either party giving to the other notice one year in adverse the second by either party giving to the other notice one will be the second by the sec Year in advance of the fiscal periods affected, or until otherwise rescinded by the repeal of the income tax laws of either country.

porations resident in the country of the other and which have been paid more that a year from the date hereof shall not be refunded.

I have the honour to be, etc.,

O. D. SKELTON,

Consul-General of Denmark. For the Secretary of State for External Affairs. The Secretary of State

Consul-General of Denmark, p.t. Ottawa.



From the Consul General of Denmark for Canada to the Secretary of State for External Affairs of Canada

.esiant Jansetz To P.t. OTTAWA, 18th June, 1929.

Orrawa, 18th June, 1929. SIR,-It being the desire of our respective Governments to effect an arrange ment for reciprocal exemption from Income Tax of income arising within their respective countries from the respective countries from the operation therein of ships owned or controlled by and used in the business of persons or corporations resident in the country of the other. I have the bonour to inform the country of the other, I have the honour to inform you that the Government of Denmark agrees to the following undertaking:-

1. In respect of Denmark the Danish Government undertakes that in accordance with the Danish law the income from the operation of ships owned or operated by persons or composition of the persons of ships owned or operated by persons or corporations resident in Canada shall not be liable to taxation.

2. In respect of Canada the Canadian Government undertakes that in from accordance with the provisions of the Income War Tax Act the income from the operation of ships owned or operated by persons or corporations resident in Denmark shall in like manner be exempt from taxation.

3. It is understood that the expression "operation of ships" means the business carried on by an owner of ships and that for the purpose of this definition the expression "owner" includes any charterer.

4. It is agreed that the exemption from income tax on the income derived from the operation of the aforementioned ships shall be deemed to be effective in respect of the income of fiscal pariod in respect of the income of fiscal periods ending in the year 1929 and each year thereafter until rescinded by either poster with the sector of the year the thereafter until rescinded by either party giving to the other notice one year advance of the fiscal periods affected advance of the fiscal periods affected, or until otherwise rescinded by the repeal of the income tax laws of either court of the repeal of the income tax laws of either country.

5. It is further agreed that taxes which have been paid by persons or cor tions resident in the country of the ath porations resident in the country of the other and which have been paid more than a year from the date hereof shall a third which have been paid more than a year from the date hereof shall not be refunded. I have the honour to be, etc., linds loored etch add mori nert a

J. E. BOGGILD, of monon and avail I

Consul-General of Denmark.

The Right Honourable stole to unplayed add not The Secretary of State for External Affairs, Ottawa.