

N° 1941.

NORVÈGE ET PAYS-BAS

Accord en vue d'exempter réciproquement de l'impôt sur le revenu certains bénéfices provenant des entreprises de transports maritimes. Signé à La Haye, le 11 janvier 1929.

**NORWAY
AND THE NETHERLANDS**

Agreement for the reciprocal Exemption from Income Tax in certain Cases of Profits accruing from the Business of Shipping. Signed at The Hague, January 11, 1929.

¹ TRADUCTION. — TRANSLATION.

No. 1941. — AGREEMENT BETWEEN NORWAY AND THE NETHERLANDS FOR THE RECIPROCAL EXEMPTION FROM INCOME TAX IN CERTAIN CASES OF PROFITS ACCRUING FROM THE BUSINESS OF SHIPPING. SIGNED AT THE HAGUE, JANUARY 11, 1929.

French official text communicated by the Norwegian Minister for Foreign Affairs and the Netherlands Minister at Berne. The registration of this Agreement took place January 29, 1929.

THE ROYAL NORWEGIAN GOVERNMENT and THE ROYAL GOVERNMENT OF THE NETHERLANDS, being desirous of concluding an agreement for the reciprocal exemption from income tax in certain cases of profits accruing from the business of shipping, have agreed to the following provisions:

Article 1.

The Royal Government of the Netherlands declares that, under the laws of the Netherlands relating to income tax (*Wet op de Inkomstenbelasting van 19 December 1914 Staatsblad No. 563; Wet op de verdedigingsbelasting II van 28 December 1926, Staatsblad, No. 430*) tax is not chargeable on any profits which accrue from the business of shipping carried on by an individual resident in Norway or by a company managing and controlling such business in Norwegian territory.

Article 2.

The Royal Government of the Netherlands declares that, under the law of the Netherlands relating to Dividend and Tantième Tax, of January 11, 1918, (*Legal Gazette No. 4*), tax is not chargeable on any profits which accrue from the business of shipping carried on by an individual resident in Norway or by a company managing and controlling such business on Norwegian territory.

Article 3.

In view of the provisions contained in Articles 1 and 2, the Royal Norwegian Government declares that under Norwegian legislation relative to taxation (paragraph 15 (2) of the Norwegian Rural Taxation Law and paragraph 10 (2) of the Town Taxation Law) persons, companies and institutions domiciled in the Netherlands shall be exempt from the obligation to pay taxes on profits accruing from ships putting in at Norwegian ports.

¹ Traduit par le Secrétariat de la Société des Nations, à titre d'information.

¹ Translated by the Secretariat of the League of Nations, for information.

Article 4.

The expression " the business of shipping " means the business carried on by an owner of ships " ; for the purpose of this definition the expression " owner " includes any charterer.

Article 5.

The present Agreement shall enter into force on the day of signature and may be denounced by either High Contracting Party at any time with six months' notice.

In faith whereof the undersigned, duly authorised to that effect, have signed the present Agreement, and have affixed thereto their seals.

Done in duplicate at The Hague, January 11, 1929.

(Signed) Emil HUITFELDT.

(Signed) Beelaerts VAN BLOKLAND.