

N° 2492.

BELGIQUE ET DANEMARK

Convention ayant pour but d'éviter
la double imposition des revenus
des entreprises de navigation
maritime des deux pays. Signée
à Bruxelles, le 21 décembre 1928.

BELGIUM AND DENMARK

Convention for the purpose of pre-
venting the Double Taxation of
Income derived from Shipping
Undertakings of the two Countries.
Signed at Brussels, December 21,
1928.

¹ TRADUCTION. — TRANSLATION.

No. 2492. — CONVENTION ² BETWEEN BELGIUM AND DENMARK FOR THE PURPOSE OF PREVENTING THE DOUBLE TAXATION OF INCOME DERIVED FROM SHIPPING UNDERTAKINGS OF THE TWO COUNTRIES. SIGNED AT BRUSSELS, DECEMBER 21, 1928.

French official text communicated by the Permanent Delegate of Denmark accredited to the League of Nations and the Belgian Minister for Foreign Affairs. The registration of this Convention took place October 12, 1930.

THE ROYAL BELGIAN GOVERNMENT and THE ROYAL DANISH GOVERNMENT being desirous of preventing the double taxation of income derived from the business of shipping by shipping undertakings domiciled in either of the two countries and carrying on their business in the other, have thought it desirable to conclude a convention based on the principle of reciprocity. The undersigned, being duly authorised, have agreed on the following provisions :

Article 1.

Shipping undertakings domiciled in Denmark, the vessels of which call at Belgian ports to load or unload cargo or to take on board or land passengers shall be exempt in Belgium from the payment of the tax on income or profits accruing from the operation of these vessels.

Shipping undertakings domiciled in Belgium, the vessels of which call at Danish ports to load or unload cargo or to take on board or land passengers shall by reciprocity be exempt in Denmark from the payment of the tax on income or profits accruing from the operation of these vessels.

Article 2.

The expression " shipping undertakings " shall be taken to mean undertakings directed by an owner of ships and the expression " owner " shall include any charterer.

Article 3.

Income or profits from the business of shipping shall also include income or profits derived from the sale of passage tickets in the country in which the company issuing them is not domiciled.

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.

² The exchange of ratifications took place at Copenhagen, August 11, 1930.

Article 4.

The present Convention shall be ratified and the ratifications shall be exchanged at Copenhagen. It shall come into force two months after the exchange of ratifications. It may be denounced at any time by giving six months notice.

In faith whereof the undersigned Plenipotentiaries have signed the present Convention and thereto affixed their seals

Done at Brussels, December 21, 1928.

(L. S.) (Signed) O. KRAG.

(L. S.) (Signed) HYMANS.