

N° 2331.

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## FRANCE ET PAYS-BAS

Echange de notes comportant un accord relatif à l'exemption réciproque de l'impôt sur le revenu en ce qui concerne certains cas de bénéfices réalisés par des entreprises de navigation. Paris, les 15 et 28 février 1930.

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## FRANCE AND THE NETHERLANDS

Exchange of Notes constituting an Agreement for the reciprocal Exemption from Income Tax in certain Cases of Profits accruing from the Business of Shipping. Paris, February 15 and 28, 1930.

<sup>1</sup> TRADUCTION. — TRANSLATION.

No. 2331. — EXCHANGE OF NOTES BETWEEN THE FRENCH AND NETHERLANDS GOVERNMENTS CONSTITUTING AN AGREEMENT FOR THE RECIPROCAL EXEMPTION FROM INCOME TAX IN CERTAIN CASES OF PROFITS ACCRUING FROM THE BUSINESS OF SHIPPING. PARIS, FEBRUARY 15 AND 28, 1930.

*French official text communicated by the Netherlands Minister at Berne. The registration of this Exchange of Notes took place May 22, 1930.*

## I.

MINISTRY OF FOREIGN AFFAIRS.

DIRECTORATE FOR ADMINISTRATIVE  
AND TECHNICAL QUESTIONS.

SUB-DIRECTORATE FOR ADMINISTRATIVE  
QUESTIONS AND INTERNATIONAL UNIONS.

PARIS, *February 15, 1930.*

MONSIEUR LE MINISTRE,

With reference to your letter of January 27 last, I have the honour to inform you that the Government of the French Republic is prepared to put the following agreement into force if Her Majesty's Government will assume an identical obligation :

The Netherlands Government undertakes not to levy any tax assessed on the profits made by sea-going vessels flying the French flag and owned by individuals or companies established outside the territory of the Netherlands.

Consequently, French shipping enterprises shall be exempt in the Netherlands from income tax (*Wet op de Inkomstenbelasting van 19 December 1914, Staatsblad No. 563* ; *Wet op de Verdedingsbelasting II van 28 December 1926, Staatsblad No. 430*) and from the dividend and tantième tax (*Wet op de Dividend- en Tantième belasting van 11 Januari 1918, Staatsblad No. 4*).

The French Government for its part undertakes not to levy any tax assessed on profits made in France by vessels flying the Netherlands flag and owned by individuals or companies established outside the territories of France.

Consequently, Netherlands shipping enterprises shall be exempt in France from the tax on industrial and commercial profits imposed under Part I of the Law of July 31, 1917, and from the income tax levied in virtue of the Law of June 29, 1872, and the Decree of December 6 of that year.

The present agreement shall take effect as from January 1st, 1930.

I have the honour to be, etc.

BRIAND.

Monsieur le Jonkheer Loudon,  
Netherlands Minister,  
Paris.

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

<sup>1</sup> Translated by the Secretariat of the League of Nations, for information.

## II.

No 578.

PARIS, February 28, 1930.

YOUR EXCELLENCY,

In reply to the letter which you were good enough to address to me on February 15 last from the Directorate for Administrative and Technical Questions, Sub-Directorate for Administrative Questions and International Unions, and which only reached me to-day, I have the honour, acting on the instructions I have received, to inform you that Her Majesty's Government is prepared to put into force the following agreement, the text of which corresponds to that which I had the honour to submit to you in my letter No. 226 of January 27.

The Netherlands Government undertakes not to levy any tax assessed on the profits made by sea-going vessels flying the French flag and owned by individuals or companies established outside the territory of the Netherlands.

Consequently, French shipping enterprises shall be exempt in the Netherlands from 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*) " and from the dividend and tantième tax (*Wet op de Dividend-en Tantiëmebelasting van 11 Januari 1918, Staatsblad No. 4*).

The French Government for its part undertakes not to levy any tax assessed on profits made in France by vessels flying the Netherlands flag and owned by individuals or companies established outside the territories of France.

Consequently, Netherlands shipping enterprises shall be exempt in France from the tax on industrial and commercial profits imposed under Part I of the Law of July 31, 1917, and from the income tax levied in virtue of the Law of June 29, 1872, and the Decree of December 6 of that year.

The present agreement shall take effect as from January 1, 1930.

I have the honour to be, etc.

LOUDON.

To His Excellency  
Monsieur Aristide Briand,  
Minister for Foreign Affairs,  
Paris.

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