No. 4160

DENMARK
and
SWITZERLAND

Convention (with Final Protocol and annexes) for the avoidance of double taxation in the matter of taxes on income and property. Signed at Berne, on 14 January 1957

Official texts: Danish and German.

Registered by Denmark on 31 January 1958.

DANEMARK
et
SUISSE

Convention (avec Protocole final et annexes) en vue d'éviter les doubles impositions dans le domaine des impôts sur le revenu et sur la fortune. Signée à Berne, le 14 janvier 1957

Textes officiels danois et allemand.

Enregistrée par le Danemark le 31 janvier 1958.

[TRANSLATION — TRADUCTION]

No. 4160. CONVENTION[1] BETWEEN THE KINGDOM OF DENMARK AND THE SWISS CONFEDERATION FOR THE AVOIDANCE OF DOUBLE TAXATION IN THE MATTER OF TAXES ON INCOME AND PROPERTY. SIGNED AT BERNE, ON 14 JANUARY 1957

The Swiss Confederation and the Kingdom of Denmark, being desirous of avoiding so far as possible double taxation in the matter of taxes on income and property, have agreed to enter into a convention.

For this purpose plenipotentiaries have been designated as follows :

By the Swiss Federal Council :

Mr. Max Petitpierre, member of the Federal Council, Chief of the Federal Political Department ;

By His Majesty the King of Denmark :

Mr. Carl-Adalbert-Constantin Brun, Envoy Extraordinary and Minister Plenipotentiary of the Kingdom of Denmark in Switzerland ;

Who, having communicated to each other their full powers, found in good and due form, have agreed on the following provisions :

Article 1

1. It is the object of this Convention to protect persons liable to taxation who are domiciled or established in one of the two States against the double taxation which might be the consequence of the simultaneous application of the Swiss and Danish laws concerning the ordinary and special taxes on income and property.

2. For the purposes of this Convention, the expression "taxes on income and property" means the taxes which are levied under Swiss or Danish law on income (total income or parts thereof) and on property (total property or parts thereof), including the taxes on profits derived from the alienation of movable and immovable property (profits from the disposal of capital assets or of real property) and on increments of capital and of property.

3. The Convention relates to the taxes levied by either State or by the cantons, districts, *Kreise,* communes or associations of communes, in particular

[1] Came into force on 26 August 1957 by the exchange of the instruments of ratification at Copenhagen, in accordance with article 13.

to the taxes enumerated in annex I[1] (Danish legislation) and annex II[1] (Swiss legislation), and to any taxes of the same or of like nature which may in the future be added to or substituted for the said taxes. It shall also apply to the taxes levied in the form of surcharges (*centimes additionnels*).

4. Except as provided in article 11 hereof, this Convention shall not, so far as the Kingdom of Denmark si concerned, apply to the Faroe Islands and Greenland.

Article 2

1. Except as otherwise provided in this Convention, income and property shall not be taxable except in the State in which the recipient of the income or the owner of the property is domiciled.

2. For the purposes of this Convention, an individual shall be deemed to be domiciled in the State in which he may establish his permanent residence. If he may do so in either State, he shall be deemed to be domiciled at the place with which he has the strongest personal ties (centre of vital interests).

3. If the domicile of an individual cannot be determined as provided in the foregoing paragraph, he shall be deemed to be domiciled at the place of his permanent abode. For the purposes of this provision, a person shall be deemed to have his permanent abode at the place where he resides in such circumstances that it may be presumed that he does not propose to remain there merely temporarily. If an individual has a permanent abode in both States or has no permanent abode in either State, he shall be deemed to be domiciled in the State of which he is a national. If he is a national of both States or is not a national of either State, the competent administrative authorities shall come to an agreement on the question in each individual case.

4. For the purposes of this Convention, the domicile or head office of bodies corporate shall be determined in accordance with the legislation of each of the two States. If it should appear that a body corporate is domiciled in both States, the place in which the effective management is carried on shall be deemed to be its domicile. Partnerships or associations of persons which are not incorporated shall be placed on the same footing as bodies corporate for the purposes of determining domicile. The domicile of an undivided estate shall be deemed to be the place where the deceased person had his domicile within the meaning of paragraphs 2 and 3 above at the time of his death.

Article 3

1. Immovable property (including property accessory thereto and livestock and equipment used in the operation of an agricultural or forestry undertaking)

[1] See p. 82 of this volume.

and income derived therefrom (including the proceeds of the operation of agricultural or forestry undertakings) shall not be taxable except in the State in which the property is situated.

2. Rights which are governed by the provisions of private law concerning real property, rights of usufruct in immovable property and rights to fixed or variable compensation (royalties) for the use of mineral deposits, wells and other natural resources (but not claims of any nature whatsoever which are secured by mortgage) shall be deemed to be immovable property.

3. The expressions "immovable property", "property accessory thereto", "rights deemed to be immovable property" and "rights of usufruct" shall have the meanings attached to them in the legislation of the State in which the property in question is situated.

Article 4

1. Commercial, industrial and trade undertakings of every kind (including financial, transport or insurance undertakings), and the income from the operation thereof, including profits derived from the alienation of the undertaking or of any part thereof, shall not be taxable except in the State in which the undertaking maintains a permanent establishment. This provision shall also apply if the undertaking extends its activities to the territory of the other State without maintaining a permanent establishment there.

2. For the purposes of this Convention, the expression "permanent establishment" means a permanent installation of an undertaking at which the undertaking carries on all or part of its business. In particular, the said expression means the head office of the undertaking, the seat of its management, branch establishments, factories and workshops, sales departments, the mineral deposits, wells and other natural resources which are being worked, and permanent offices of representation.

3. If the undertaking maintains permanent establishments in both States, each State shall tax only the property employed for the purposes of the permanent establishment situated in its own territory and only the income earned by such establishment.

4. An active or inactive participation in an undertaking organized as a partnership (ordinary partnership, unincorporated company (*société en nom collectif*) or limited partnership (*société en commandite*) under Swiss law ; community of interests (*interessentskab*) or limited partnership under Danish law) shall not be taxable except in the State in which the undertaking maintains a permanent establishment, unless such participation takes the form of shares, *jouissance* certificates or other similar securities, or of shares in co-operative societies or in private limited companies.

Article 5

1. Notwithstanding the provisions of article 4, sea, inland water or air transport undertakings and the income from their operations shall not be taxable except in the State in which the effective management of the undertaking is situated.

2. The provisions of paragraph 1 above shall also apply :

(*a*) If a sea, inland water or air transport undertaking of one State maintains on the territory of the other State en agency for the carriage of persons or goods ;

(*b*) If air transport undertakings of the two States participate in a pool, in a joint undertaking or in an international transport organization.

Article 6

1. Income from liberal professions exercised by persons domiciled in one of the two States shall not be taxable in the other State unless the person in question, in the gainful exercise of his profession, makes use in that State of a permanent installation regularly available to him.

2. Movable property employed in permanent installations used for the exercice of a liberal profession shall not be taxable except in the State in which such installations are situated.

Article 7

1. Subject to the provisions of article 8, income derived from a gainful occupation by persons who are not self-employed (wages, salaries and other similar forms of remuneration) shall not be taxable except in the State in which the personal occupation from which such income is derived is carried on.

2. For the purposes of the provisions of paragraph 1 above, individuals who serve entirely or mainly on board ships or aircraft of a sea, inland water or air transport undertaking of one State shall not be deemed to be carrying on their gainful occupation in that of the two States in which the effective management of the undertaking is situated unless they are not domiciled in the other State and are not taxed in that other State in respect of their incomes from such employment.

3. The provisions of paragraph 1 above shall not apply in any case in which a person who is employed in one of the two States and is domiciled in that State resides for professional reasons for short periods, no single period of residence exceeding one year, in the territory of the other State and carries on his occupation in that other State on behalf of an employer of the State in which he is domiciled.

4. Retirement pensions, widows' or orphans' pensions and other grants or monetary benefits payable by reason of the former services of any person who

was gainfully occupied but not self-employed, shall not be taxable except in the State in which the beneficiary is domiciled.

Article 8

1. Director's fees, attendance fees and other remuneration paid to members of the boards of management or boards of directors of incorporated companies, partnerships limited by shares, private limited companies and co-operative societies or to the general managers of private limited companies by reason of their services in such capacity, shall not be liable to taxation except in the State in which the recipient is domiciled.

2. Any remuneration for services which the persons referred to in paragraph 1 above receive in effect by reason of their services in some other capacity shall be taxable as provided in article 6 or as provided in article 7.

Article 9

1. Subject to the provisions of paragraphs 2 and 3 below, each of the two States shall retain the right to tax income from movable capital property by deduction at source, notwithstanding the fact that such income is not taxable except in the State in which the recipient is domiciled or established (article 2, paragraph 1).

2. Reimbursement of the tax on income from movable capital property which is charged by Switzerland by deduction at source may be applied for before the expiry of two years by a person in receipt of such income who is domiciled in Denmark, upon production of an official certificate of domicile and of liability to the taxes on income and property in Denmark, the amount to be reimbursed being :

(*a*) If Denmark also taxes income of like kind at source, the amount which in Switzerland is allowed to be set off against the tax recoverable from persons in receipt of such income who are domiciled in Swiss territory, this amount not to be less, however, than the tax charged in excess of 5 per cent of the income ;

(*b*) In all other cases, the amount by which such tax exceeds 10 per cent of the income.

3. If henceforth Denmark should charge tax on income from movable capital property by means of deduction at source, then a person in receipt of such income who is domiciled in Switzerland would be at liberty to apply, before the expiry of two years, for the reimbursement of the entire amount deducted at source, upon production of an official certificate of domicile and of liability to the taxes on income and property in Switzerland.

4. In any case in which reimbursement of the tax charged in Switzerland by deduction at source on income from movable capital property cannot be applied

for under paragraph 2 by a person in receipt of such income who is domiciled in Denmark, such tax shall be set off by Denmark against its own taxes on income. In this case, the amount of tax to be set off may be reduced by the amount of the relief granted to the taxpayer under Danish law, which permits the taxpayer to deduct tax charged at source in calculating the tax on income.

Aritcle 10

1. If a taxpayer can prove that, in consequence of measures adopted by the tax authorities of the two States, he is liable to taxation which is irreconcilable with the principles of this Convention, he may apply to the authorities of the State in which he is domiciled. If the application is admitted, the competent administrative authority of that State shall, if it is unwilling to waive its own tax claim, endeavour to agree with the competent administrative authority of the other State on some equitable means of avoiding double taxation.

2. For the purpose of eliminating double taxation in cases not provided for in this Convention, and also in cases in which the interpretation or application of this Convention gives rise to difficulty or doubt, the competent administrative authorities of the two States shall enter into consultations with one another.

Article 11

1. This Convention may, with such amendments as the two States consider necessary, be extended to the Faroe Islands or to Greenland if these territories levy taxes substantially similar to those which are the subject of this Convention. The conditions under which, and the manner in which, such extension is to be effected shall be specified in an exchange of notes between the two States.

2. Except as otherwise expressly agreed between the two States, the denunciation of this Convention under article 14 hereof shall terminate the effect of this Convention in the Faroe Islands and in Greenland, if it has been extended to these territories pursuant to paragraph 1 above.

Article 12

This Convention, of which the original texts drawn up in the Danish and German languages are equally authentic, shall be ratified and the instruments of ratification shall be exchanged at Copenhagen as soon as possible.

Article 13

This Convention shall enter into force on the date of the exchange of instruments of ratification; its provisions shall apply for the first time:

(*a*) To the taxes deductible at source on income from movable capital property which fall due in the calender year 1956;

(*b*) To the other Danish taxes on income and property which are charged in respect of the period subsequent to 31 March 1956 ;

(*c*) To the other Swiss taxes on income and property which are charged in respect of the period subsequent to 31 December 1956.

Article 14

This Convention shall remain in force for so long as it has not been denounced by one of the two States. Either State may denounce the Convention by notice of not less than six months before the end of a calender year. In any such case, the Convention shall apply for the last time :

(*a*) To the taxes deductible at source on income from movable capital property which fall due in the calendar year at the end of which the denunciation takes effect ;

(*b*) To the other Danish taxes on income and property which are charged in respect of the financial year ending during the calendar year at the end of which the denunciation takes effect ;

(*c*) To the other Swiss taxes on income and property which are charged in respect of the period preceding the end of the calendar year at the end of which the denunciation takes effect.

IN WITNESS WHEREOF, the plenipotentiaries of the two States have signed this Convention and have affixed their seals thereto.

DONE at Berne, 14 January 1957.

For the Swiss Confederation :
(*Signed*) Max PETITPIERRE

For the Kingdom of Denmark :
(*Signed*) C. A. C. BRUN

FINAL PROTOCOL

On proceeding to sign the Convention concluded this day between the Swiss Confederation and the Kingdom of Denmark for the avoidance of double taxation in the matter of taxes on income and property, [1] the undersigned plenipotentiaries have made the following identical declarations which shall form an integral part of the Convention.

Ad article 1

1. The list contained in annexes I and II of the taxes to which the Convention applies is not exhaustive. For the purpose of keeping the annexes up to date,

[1] See p. 56 of this volume.

the competent administrative authorities of the two States, *viz.* the Ministry of Finance in Denmark and the Federal Department of Finance and Customs (tax administration) in Switzerland, shall at the end of each year communicate to one another any amendments made in their respective tax legislation.

2. The competent administrative authorities of the two States shall consult with one another to remove any doubts which may arise regarding the taxes to which the Convention is to apply.

3. The Convention shall not apply :

(*a*) To legacies or bequests, or to gifts which are not liable to income tax ;

(*b*) To the taxes charged at source on lottery prizes.

4. The Convention shall not apply to property vested in a trust fund in the form of cash, or in payments in discharge of a trust fund (including Danish fiefs and estates in tail) nor shall it apply to the income derived therefrom. In particular cases of this kind, the competent administrative authorities of the two States shall consult with one another as necessary for the purpose of avoiding double taxation.

5. Tax on the income from an estate, or on the property forming part of an estate, may be charged as provided in this Convention against the beneficiary in the other State, in so far as the undivided estate is not itself liable for the tax on the income and property in question in the State in which the deceased person was last domiciled. In particular cases, the competent administrative authorities of the two States shall consult with one another for the purpose of avoiding double taxation.

6. The provisions of the Convention shall not operate to prejudice any beneficial treatment to which taxpayers are entitled in pursuance of the legislation of each of the two States or by virtue of international agreements.

7. The Convention shall not affect the right to more extensive fiscal exemptions which attaches to diplomatic and consular officials under the general rules of international law. If the State to which an official is accredited does not charge tax on his income and property by reason of exemptions as aforesaid, the right to tax shall be reserved to the accrediting State.

8. The nationals (including bodies corporate and partnerships or unincorporated associations of persons) of one of the two States shall not be liable in the other State to taxes other or higher than those to which the nationals of that State in similar circumstances are liable. In particular, the nationals of one of the two States who are taxable in the territory of the other State shall be entitled, on the same footing as the nationals of that other State in similar circumstances, to fiscal exemptions and to relief and rebate of tax. For the purposes of this paragraph, the term "tax" means any tax or public levy whatsoever, irrespective of its nature or title or of the authority responsible for collecting it.

9. The minimum rates of the Danish State taxes on the income and property of persons, partnerships and companies that, though not domiciled in Denmark, are liable in that country to restricted taxation shall not apply to taxpayers domiciled or established in Switzerland. In addition, companies and partnerships having their head office in Switzerland shall not be liable to any tax on capital or property in Denmark for so long as companies and partnerships having their head office in Denmark are not liable to such tax.

Ad article 2

1. Income derived from the sale or grant of licences for the use of author's rights in literary, musical and artistic property and in industrial property (patents, trade marks, designs and patterns, working drawings, technical processes and practices formulae, trade secrets and the like), including fees in respect of the rental of films or the use of industrial, commercial or scientific equipment, shall be taxable, subject to the provisions of article 4, as provided in article 2, paragraph 1. This provision shall also apply to property consisting of such rights.

2. If a taxpayer has permanently transferred his domicile from one State to the other, he shall cease to be liable to tax in the first State, in so far as such liability is determined by domicile, at the end of the calendar month during which the transfer of domicile took place. His liability to taxation in the other State, in so far as such liability is determined by domicile, shall commence at the beginning of the calendar month following his transfer of domicile.

3. If an individual transfers his domicile from Denmark to Switzerland in the course of a Danish financial year and again elects domicile in Denmark before the end of the same tax year, Danish fiscal sovereignty, in so far as it is based on domicile, shall not be deemed to have been interrupted except for the duration of the domicile in Switzerland.

4. Students, apprentices and trainees who reside in one of the two States for the sole purpose of study or training shall not be liable to taxation in that State in respect of sums which they receive from relatives or from scholarship funds or similar institutions domiciled or established in the other State in the form of allowances for maintenance, study or training.

5. Each of the two States reserves to itself the right to tax, in conformity with its own legislation, movable property which is subject to right of usufruct. If as a consequence of the foregoing provision cases of double taxation should occur, the competent administrative authorities of the two States shall consult with one another in each individual case concerning the division of jurisdiction for taxation purposes.

Ad articles 2 to 9

1. Income which, in accordance with the provisions of the Convention, is subject to taxation in one of the two States shall not be taxable, even by deduction at source, in the other State. This provision is subject to the provisions of article 7, paragraph 2, and of article 9.

2. Nothing in the Convention shall be taken to limit the right of each of the two States to assess tax on the portions of a person's income or property over which it has exclusive jurisdiction for taxation purposes at the rates appropriate to the entire income or the entire property of the taxpayer concerned.

Ad article 3

1. The provisions of article 3 shall apply both to income received from the direct management and utilization of immovable property and to income derived from the letting, lease, or other form of utilization of such property. This provision shall also apply to fixed or variable compensation (royalties) for the use of mineral deposits, wells and other natural resources ; it shall apply likewise to income arising out of the alienation of immovable property, including, where applicable, property accessory thereto which is included in such alienation or the livestock or equipment used in the operation of an agricultural or forestry undertaking and included in such alienation.

2. The immovable property of the undertakings referred to in article 4, paragraph 1, and article 5 shall also be governed by the rules laid down in article 3.

Ad article 4

1. Construction sites established for the purposes of specific building operations but not for other purposes shall not be deemed to constitute permanent establishments if the operations in question are completed within two years.

2. The expression "permanent establishment" as defined in article 4 shall not be interpreted to include business relations maintained solely through a representative who is completely independant and acts as a principal in his own name. Similarly, the said expression shall not be interpreted to include the case of a representative who, although permanently carrying on business in the territory of one State for an undertaking in the other State, is merely an intermediary for such business and is not authorized to conclude any business in the name and for the account of the party which he represents.

3. An undertaking shall not be deemed to be maintaining a permanent establishment in the State in which it employs a representative within the meaning of paragraph 2 by reason of the fact that such representative holds a sample collection or goods on consignment or for delivery of that undertaking, unless orders received through a representative within the meaning of paragraph 2, second sentence, are, as a rule, executed from such stock and such stock is managed by the representative himself.

4. The fact that an undertaking of one of the two States operates, in the territory of the other State, a buying office which is used solely for the purpose of purchasing goods or merchandise intended for the supply of one or more sales or manufacturing establishments of that undertaking, shall not constitute the setting up of a permanent establishment of the undertaking in the other State.

5. The storage of goods by an undertaking of one of the two States on the premises of an undertaking of the other State for the purpose of their transformation and subsequent shipment, and their transformation and shipment by the person transforming the goods, shall not constitute the setting up of a permanent establishment, within the meaning of article 4, paragraph 2, of the undertaking acting as principal.

6. If in consequence of the possession of shares, *jouissance* certificates and similar securities in an undertaking organized as a partnership or company, or of the possession of shares in a co-operative society or private limited company, an interest is held in the said company, partnership or society, the holding of that interest shall not constitute a permanent establishment so far as the holder is concerned, even if the interest in question confers an influence on the management of the undertaking (as in the relationship between a parent company and its subsidiary company).

7. If permanent establishments, within the meaning of article 4, paragraph 3, exist in both States, a proportionate share of the general expenses of the head office shall be charged against the earnings of the various permanent establishments. For this purpose, all expenses, including management and general administrative costs, which may reasonably be held to fall to the share of the permanent establishment in question shall be admitted as deductions in determining the profits of such permanent establisment.

8. The profits of insurance undertakings which maintain permanent establishments in both States shall, after deduction of a prior share of 10 per cent in favour of the State in which the head office of the undertaking is situated, be apportioned in the proportion which the gross premiums received by the permanent establishment bear to the total gross premiums received by the undertaking.

9. Any profit or advantage which was derived indirectly from the permanent establishment, or which was allotted or granted to shareholders, to other persons holding interests or to persons closely related to them, in consequence either of some special pricing arrangement or of some benefit that would not have been granted to others, may be added to the profits earned by the permanent establishment from industrial, commercial or manufacturing activities.

10. If by virtue of its participation in the management or capital of an undertaking in the other State, an undertaking in one of the two States grants to or imposes upon that undertaking, in their commercial or financial relations, conditions other than those which it would grant to a third undertaking, then any profits which would normally have appeared in the accounts of one of the

undertakings but which have been transferred in the aforesaid manner to the accounts of the other undertaking may be added to the taxable profits of the first undertaking, subject to the appropriate legal remedies and to the consultation procedure provided for in article 10.

11. The competent administrative authorities may make special arrangements in particular cases, or particular groups of cases, concerning the division of jurisdiction for taxation purposes, in accordance with article 4, paragraph 3.

Ad article 5

1. The expression "sea, inland water or air transport undertaking" means an undertaking which carries on the business of transporting persons or goods as the owner, lessee or charterer of ships or aircraft.

2. The declarations concerning reciprocity contained in the exchange of notes of 28 September 1954 respecting the taxation of sea or air transport undertakings shall cease to be in effect upon the entry into force of this Convention (article 13).

Ad article 6

1. The expression "liberal profession" means any gainful occupation carried on by persons who are self-employed in the sciences, arts, literature, education or instruction, and the gainful occupation of medical practitioners, lawyers, architects, engineers, accountants, tax advisers and patent agents.

Ad article 9

1. The expression "income from movable capital property" shall apply both to income from securities (debentures, profit participating debentures, and other bonds, whether or not secured by mortgage, pledge certificates, mortgage bonds, shares, *jouissance* shares, *jouissance* certificates, founders' shares or other interests in the form of securities issued by bodies corporate) and to income from loans (whether or not secured by mortgage), deposits, cash guarantees and similar capital assets, or from shares in co-operative societies and private limited companies.

2. A tax on the income from movable capital property shall be deemed to have been deducted at source for the purposes of article 9 if the payor of the income pays the tax for the account of the payee of the income.

3. The time limit of two years provided for in article 9, paragraphs 2 and 3, shall be deemed to have been observed if the application is received by the competent authority of the State in which the applicant is domiciled within two years after the expiry of the calendar year in which the taxable payment fell due.

4. A taxpayer may be granted relief from deduction at source in lieu of the reimbursement provided for in article 9, paragraph 2.

5. The competent administrative authorities of the two States shall consult with one another concerning the relief procedure provided for in article 9, paragraphs 2 and 3, and in particular concerning the form of the certificates and applications required, the type of documentary evidence to be produced and the measures to be taken to prevent the improper submission of applications for relief. Each State may make such regulations as may be necessary for the purpose of giving effect to the Convention.

6. The rights accorded under article 9, paragraphs 2 and 3, to members of diplomatic or consular missions and to international organizations, their organs and their officials, shall be governed by the following rules :

(*a*) Any person who, being a member of a diplomatic or consular mission of one of the two States, is resident in the other State or in a third State and is a national of the State by which he is accredited, shall be deemed to be domiciled in the accrediting State if he is liable, in that State, to the taxes on movable capital property and on the income derived therefrom and the said income is liable to taxation at source in the other State ;

(*b*) International organizations, their organs and officials and the personnel of diplomatic or consular missions to third States, that are domiciled or resident in one of the two States and are in that State exempt from the taxes on movable capital property or on the income derived therefrom shall not be entitled to relief from the taxes which are deducted at source in the other State.

7. The State which charges tax at source shall make available to persons who apply for relief from such tax the same legal remedies as are available to its own taxpayers.

8. Any rights to relief from the tax charged at source which are granted under the legislation of the State charging the tax shall not be affected. The said rights and their exercise shall be governed exclusively by the legislation of the State charging the tax.

Ad article 10

1. The application referred to in article 10, paragraph 1, may be made even if the taxpayer has not exhausted all the legal remedies open to him, and the taxpayer shall not be estopped from resorting to all the remedies open to him under the law by reason of the fact that he has made an application as aforesaid.

2. An application under article 10, paragraph 1, shall as a general rule be made by the taxpayer within one year after the expiry of the calendar year in

which he became aware of the existence of double taxation through the receipt of tax statements or through notification of other official decisions.

DONE at Berne, 14 January 1957.

For the Swiss Confederation :
(*Signed*) Max PETITPIERRE

For the Kingdom of Denmark :
(*Signed*) C. A. C. BRUN

ANNEX I

(*Danish Tax Legislation*)

The Convention relates in particular to the following Danish taxes :

(*a*) State tax (ordinary and special) on income, including surcharges ;

(*b*) State tax on property ;

(*c*) Communal income tax ;

(*d*) Contribution for the established church (church tax).

ANNEX II

(*Swiss Tax Legislation*)

The Convention relates in particular to the following Swiss taxes ;

A. Federal taxes :

(*a*) National defence tax ;

(*b*) Stamp duty on coupons ;

(*c*) Tax on anticipated income ;

(*d*) Tax deducted from life insurance benefits.

B. Taxes of cantons, districts, *Kreise* and communes :

(*a*) On income (total income), earned income, yield from property, commercial profits, etc.) ;

(*b*) On property (total property, movable and immovable property, commercial property, etc.) and on capital.