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No. 6085

**NORWAY
and
GREECE**

**Agreement for the reciprocal tax exemption of income
derived from air transport enterprises. Signed at
Athens, on 25 May 1955**

Official text: French.

Registered by Norway on 22 February 1962.

**NORVÈGE
et
GRÈCE**

**Accord en vue de l'exonération fiscale réciproque des
revenus réalisés dans l'exercice de la navigation
aérienne. Signé à Athènes, le 25 mai 1955**

Texte officiel français.

Enregistré par la Norvège le 22 février 1962.

[TRANSLATION — TRADUCTION]

No. 6085. AGREEMENT¹ BETWEEN THE KINGDOM OF NORWAY AND THE KINGDOM OF GREECE FOR THE RECIPROCAL TAX EXEMPTION OF INCOME DERIVED FROM AIR TRANSPORT ENTERPRISES. SIGNED AT ATHENS, ON 25 MAY 1955

The Royal Government of Norway and the Royal Government of Greece, desiring to conclude an agreement for the reciprocal tax exemption of profits earned by air transport undertakings in international traffic, have agreed as follows :

Article 1

Air navigation enterprises constituted in the territory of one of the Contracting Parties shall be exempt, in the territory of the other Contracting Party, from all taxes on income or profits, occupational taxes, licence fees or other similar taxes payable to the State or to local authorities in respect of profits derived from the exercise of air navigation in international traffic.

Article 2

1. The expression “ the exercise of air navigation ” means the carriage of persons or goods by the owners or charterers of aircraft.

2. The expression “ enterprises constituted in Norway ” means air navigation enterprises operated by individuals resident in Norway and having no domicile in Greece, by joint stock companies or partnerships—including companies in which the Norwegian State participates—constituted in conformity with the laws in force in Norway and having their head offices and central administration in Norwegian territory, and by the Norwegian State.

3. The expression “ enterprises constituted in Greece ” means air navigation enterprises operated by individuals resident in Greece and having no domicile in Norway, by joint stock companies or partnerships—including companies in which the Greek State participates—constituted in conformity with the laws in force in Greece and having their head offices and central administration in Greek territory, and by the Greek State.

¹ Came into force on 5 February 1962, the date of the exchange of the instruments of ratification, with retroactive effect from 1 January 1953, in accordance with article 3. In connexion with the ratification of the Agreement, the Government of Greece has declared that no income tax, which has already been paid, will be refunded.

Article 3

This Agreement shall come into force on the date of the exchange of instruments of ratification; it shall however apply, both in Norway and in Greece, to taxes payable on income earned on and after 1 January 1953.

This Agreement may be terminated by either Contracting Party at six months' notice; in such case, the Agreement shall cease to have effect at the end of the calendar year during which the said six months' notice expires.

DONE in duplicate at Athens, the 25 May 1955 in the French language.

For the Royal Government
of Norway :

Subject to ratification
(Signed) Kjell CHRISTIANSEN

For the Royal Government
of Greece :

Subject to ratification
(Signed) A. LIATIS