

No. 6571

**DENMARK
and
CZECHOSLOVAKIA**

Exchange of notes constituting an agreement concerning mutual exemption from taxes on profits and income derived from air navigation. Prague, 25 October 1962

Official text: French.

Registered by Denmark on 20 March 1963.

**DANEMARK
et
TCHÉCOSLOVAQUIE**

Échange de notes constituant un accord relatif à l'exonération réciproque des impôts sur les bénéfices et revenus provenant de la navigation aérienne. Prague, 25 octobre 1962

Texte officiel français.

Enregistré par le Danemark le 20 mars 1963.

[TRANSLATION — TRADUCTION]

No. 6571. EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT¹ BETWEEN DENMARK AND CZECHOSLOVAKIA CONCERNING MUTUAL EXEMPTION FROM TAXES ON PROFITS AND INCOME DERIVED FROM AIR NAVIGATION. PRAGUE, 25 OCTOBER 1962.

I

THE ROYAL DANISH LEGATION
PRAGUE

NOTE VERBALE

The Royal Danish Legation presents its compliments to the Ministry of Foreign Affairs and has the honour to inform it as follows :

1. The Danish Government declares, in virtue of the powers conferred upon it by Article I of Act No. 74 of 31 March 1953 and subject to reciprocity, that Czechoslovak air navigation enterprises are exempted in Denmark from State and communal income tax on profits or income derived from international air navigation, and from State capital tax.

2. The exemption declared in paragraph 1 shall also apply to Czechoslovak air navigation enterprises participating in a pool, a joint operating arrangement, or an international operating organization.

3. The expression "air navigation" means transport by air of persons or goods for gain by the owner, hirer or charterer of an aircraft.

4. The expression "Czechoslovak enterprise" means any air navigation enterprise having its actual management in Czechoslovakia and operated by individuals of Czechoslovak nationality resident in Czechoslovakia and not domiciled in Denmark ; or by a body corporate, even if the Czechoslovak State has an interest therein, constituted in accordance with Czechoslovak law ; or by the Czechoslovak State.

5. The exemption declared in paragraphs 1 and 2 shall also apply to Danish taxes levied for the period preceding the date of this declaration.

¹ Came into force on 25 October 1962 by the exchange of the said notes.

6. The Danish Government reserves the right to withdraw this declaration by giving six months' notice to the Czechoslovak Government, in which case the exemption shall last apply to the Danish taxes levied for the calendar year in which the said period of six months expires.

The Royal Danish Legation has the honour, etc.

Prague, 25 October 1962

To the Ministry of Foreign Affairs
Prague

II

NOTE VERBALE

The Ministry of Foreign Affairs presents its compliments to the Royal Danish Legation and has the honour to inform it as follows :

1. The Czechoslovak Government declares, in virtue of the powers conferred upon it by article 11, paragraph 1, of Act. No. 75/1952 *Sb.* (*Sbírka Zákonů*), as amended by Act No. 59/1956 *Sb.*, and in accordance with article 26, paragraph 1, of Act No. 145/1961 *Sb.*, and subject to reciprocity, that Danish air navigation enterprises are exempted in the Czechoslovak Republic from all taxes on profits or income derived from international air navigation, and from capital tax.

2. The exemption declared in paragraph 1 shall also apply to Danish air navigation enterprises participating in a pool, a joint operating arrangement, or an international operating organization.

3. The expression "air navigation" means transport by air of persons or goods for gain by the owner, hirer or charterer of an aircraft.

4. The expression "Danish enterprise" means any air navigation enterprise having its actual management in Denmark and operated by individuals of Danish nationality resident in Denmark and not domiciled in Czechoslovakia ; or by a corporation, even if the Danish State has an interest therein, constituted in accordance with Danish law ; or by the Danish State.

5. The exemption declared in paragraphs 1 and 2 shall also apply to Czechoslovak taxes levied for the period preceding the date of this declaration.

6. The Czechoslovak Government reserves the right to withdraw this declaration by giving six months' notice to the Danish Government, in which case the exemption shall last apply to the Czechoslovak taxes levied for the calendar year in which the said period of six months expires.

The Ministry of Foreign Affairs has the honour, etc.

Prague, 25 October 1962

Royal Danish Legation
Prague