

No. 7288

**CZECHOSLOVAKIA
and
SWEDEN**

Exchange of notes constituting an agreement relating to reciprocal exemption from taxes on profits, income and property derived from or connected with air transport. Prague, 25 October 1962

Official text: French.

Registered by the International Civil Aviation Organization on 8 June 1964.

**TCHÉCOSLOVAQUIE
et
SUÈDE**

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

Texte officiel français.

Enregistré par l'Organisation de l'aviation civile internationale le 8 juin 1964.

[TRANSLATION — TRADUCTION]

No. 7288. EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT¹ BETWEEN CZECHOSLOVAKIA AND SWEDEN RELATING TO RECIPROCAL EXEMPTION FROM TAXES ON PROFITS, INCOME AND PROPERTY DERIVED FROM OR CONNECTED WITH AIR TRANSPORT. PRAGUE, 25 OCTOBER 1962

I

MINISTRY OF FOREIGN AFFAIRS

No. 217 948/62

Note Verbale

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

1. The Czechoslovak Government, acting in virtue of the powers conferred upon it by paragraph 11, sub-paragraph 1, of Act No. 75/1952 of the Collection of Laws, pursuant to Act No. 59/1956 of the Collection of Laws and in accordance with paragraph 26, sub-paragraph 1, of Act No. 145/1961 of the Collection of Laws, declares, subject to reciprocity, that Swedish air navigation enterprises shall be exempt in the Czechoslovak Socialist Republic from all taxes on profits or income derived from air navigation in international traffic and from the tax on fortune.

2. The exemption provided for in paragraph 1 shall also apply to Swedish air navigation enterprises participating in a pool, a joint operating arrangement or an international operating agency.

3. The expression "air navigation" means the business of transporting persons and goods by air carried on by the owners, lessees or charterers of aircraft.

4. The expression "Swedish enterprises" means air navigation enterprises which have their actual management in Sweden and are operated by individuals of Swedish nationality resident in Sweden and possessing no domicile in Czechoslovakia, or by

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

bodies corporate—including any in which the Swedish State has an interest—constituted in accordance with the laws in force in Sweden, or by the Swedish State.

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

6. The Czechoslovak Government reserves the right to withdraw this declaration by giving six months' notice to the Swedish Government ; in that event the exemption shall last apply to Czechoslovak taxes levied for the period ending on the 31 December immediately following the expiry of the said six months' notice.

The Ministry of Foreign Affairs takes this opportunity, etc.

Prague, 25 October 1962

The Royal Embassy of Sweden
Prague

II

ROYAL EMBASSY OF SWEDEN

No. 8-275/62

Note Verbale

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

1. The Swedish Government, acting in virtue of the powers conferred upon it by the legislative decree of 26 July 1947 (No. 576) on State income tax, by the Act of 28 September 1928 (No. 370) on communal tax, and by the legislative decree of 26 July 1947 (No. 577) on the State tax on fortune, declares, subject to reciprocity, that Czechoslovak air navigation enterprises shall be exempt in Sweden from the State income tax and the communal income tax levied on profits or income derived from air navigation in international traffic, and from the State tax on fortune.

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

3. The expression "air navigation" means the business of transporting persons and goods by air, carried on by the owners, lessees or charterers of aircraft.

4. The expression "Czechoslovak enterprises" means air navigation enterprises which have their actual management in Czechoslovakia and are operated by individuals of Czechoslovak nationality residing in Czechoslovakia and possessing no domicile in Sweden, or by bodies corporate—including any in which the Czechoslovak State has an interest—constituted in accordance with the laws in force in Czechoslovakia, or by the Czechoslovak State.

5. The exemption provided for in paragraphs 1 and 2 shall also apply to Swedish taxes levied for the period prior to the date of this declaration.

6. The Swedish Government reserves the right to withdraw this declaration by giving six months' notice to the Czechoslovak Government ; in that event the exemption shall last apply to Swedish taxes levied for the period ending on the 31 December immediately following the expiry of the said six months' notice.

The Embassy of Sweden takes this opportunity, etc.

Prague, 25 October 1962

The Ministry of Foreign Affairs
of the Czechoslovak Socialist Republic
Prague