

No. 7746

**GREECE
and
FRANCE**

Convention for the avoidance of double taxation and the establishment of rules of reciprocal administrative assistance with respect to taxes on income. Signed at Athens, on 21 August 1963

Official text: French.

Registered by Greece on 10 May 1965.

**GRÈCE
et
FRANCE**

Convention tendant à éviter les doubles impositions et à établir des règles d'assistance administrative réciproque en matière d'impôts sur le revenu. Signée à Athènes, le 21 août 1963

Texte officiel français.

Enregistrée par la Grèce le 10 mai 1965.

[TRANSLATION — TRADUCTION]

No. 7746. CONVENTION¹ BETWEEN GREECE AND FRANCE FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE ESTABLISHMENT OF RULES OF RECIPROCAL ADMINISTRATIVE ASSISTANCE WITH RESPECT TO TAXES ON INCOME. SIGNED AT ATHENS, ON 21 AUGUST 1963

His Majesty the King of the Hellenes and the President of the French Republic, desiring to avoid double taxation so far as is possible and to establish rules of reciprocal administrative assistance with respect to taxes on income, have decided to conclude a Convention and have for that purpose appointed as their plenipotentiaries :

His Majesty the King of the Hellenes :

His Excellency Mr. Panayotis Pipinelis, Prime Minister and Minister for Foreign Affairs ;

The President of the French Republic :

His Excellency Mr. Guy de Girard de Charbonnières, Ambassador Extraordinary and Plenipotentiary at Athens,

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

Article 1

1. This Convention shall apply to taxes on income imposed on behalf of each Contracting State or of its political sub-divisions or local authorities, irrespective of the manner in which they are levied.

The term "taxes on income" shall be deemed to mean all taxes imposed on total income or on elements of income, including taxes on capital appreciation.

2. The purpose of this Convention is to avoid double taxation such as might result, for the residents of either Contracting Party, from the simultaneous or successive imposition in either State of the taxes referred to in paragraph 1.

3. The existing taxes to which this Convention shall apply in each Contracting State are :

¹ Came into force on 31 January 1965, one month after the exchange of the instruments of ratification, which took place at Athens on 31 December 1964, in accordance with article 30.

A. In the case of France :

(a) The tax on the income of individuals (*l'impôt sur le revenu des personnes physiques*) ;

(b) The supplementary tax (*la taxe complémentaire*) ;

(c) The tax on the profits of companies and other bodies corporate (*l'impôt sur les bénéfices des sociétés et autres personnes morales*).

B. In the case of Greece :

The single income tax on individuals and bodies corporate.

4. The Convention shall also apply to any identical or similar taxes which may subsequently be imposed in addition to or in place of the existing taxes. At the beginning of each year, the competent authorities of the Contracting States shall notify each other of any changes made in their respective taxation laws during the preceding year.

5. It is agreed that if the taxation laws of either Contracting State are amended in a manner substantially affecting the nature or character of the taxes referred to in paragraph 3 of this article, the competent authorities of the two States shall enter into consultation in order to determine what changes may have to be made in this Convention.

Article 2

In this Convention :

1. The term "France" means Metropolitan France and the overseas departments (Guadeloupe, Guiana, Martinique and Réunion).

The term "Greece" means the territories of the Kingdom of Greece.

2. The term "person" means :

(a) Any individual ;

(b) Any body corporate ;

(c) Any unincorporated body of individuals.

3. (a) The term "resident of a Contracting State" means any person who, under the law of the State in question, is liable to taxation therein by reason of his domicile, residence, place of management or any other similar criterion.

(b) Where, under the terms of paragraph 1 above, an individual is a resident of both Contracting States, the case shall be dealt with in accordance with the following rules :

(aa) He shall be deemed to be a resident of the Contracting State in which he has a permanent home available to him. If he has a permanent home available to him in both Contracting States, he shall be deemed to be a resident of the

Contracting State with which his personal and economic relations are closest (centre of vital interests).

- (bb) If the Contracting State in which he has his centre of vital interests cannot be determined, or if he had no permanent home available to him in either Contracting State, he shall be deemed to be a resident of the Contracting State in which he has an habitual abode.
- (cc) If he has an habitual abode in both Contracting States or in neither of them, he shall be deemed to be a resident of the Contracting State of which he is a national.
- (dd) If he is a national of both Contracting States or of neither of them, the competent authorities of the Contracting States shall determine the question by agreement.

(c) Where, under the terms of paragraph 1 above, a body corporate is a resident of both Contracting States, it shall be deemed to be a resident of the Contracting State in which its place of actual management is situated. The same shall apply to partnerships and associations which are not bodies corporate under the national laws by which they are governed.

4. The term "permanent establishment" means a fixed place of business in which the business of an enterprise is wholly or partly carried on.

(a) A permanent establishment shall include especially :

- (aa) A place of management ;
- (bb) A branch ;
- (cc) An office ;
- (dd) A factory ;
- (ee) A workshop ;
- (ff) A mine, quarry or other place of extraction of natural resources ;
- (gg) A building site or assembly project of more than twelve months' duration.

(b) The term "permanent establishment" shall not be deemed to include :

- (aa) The use of facilities solely for the purpose of storage, display or delivery of goods or merchandise belonging to the enterprise ;
- (bb) The maintenance of a stock of goods or merchandise belonging to the enterprise solely for the purpose of storage, display or delivery ;
- (cc) The maintenance of a stock of goods or merchandise belonging to the enterprise solely for the purpose of processing by another enterprise ;
- (dd) The maintenance of a fixed place of business solely for the purpose of purchasing goods or merchandise or for collecting information for the enterprise ;
- (ee) The maintenance of a fixed place of business solely for the purpose of advertising for the supply of information, for scientific research or for similar activities which have a preparatory or auxiliary character for the enterprise.

(c) A person—other than an agent of independent status within the meaning of sub-paragraph (d)—acting in one of the Contracting States on behalf of an enterprise of the other Contracting State shall be deemed to constitute a permanent establishment in the first-mentioned State if he has, and habitually exercises in that State, an authority to conclude contracts on behalf of the enterprise, unless his activities are limited to the purchase of goods or merchandise for the enterprise.

(d) An enterprise of one of the Contracting States shall not be deemed to have a permanent establishment in the other Contracting State merely because it carries on business in that other State through a broker, a general commission agent or any other agent of independent status, where such persons are acting in the ordinary course of their business.

(e) The fact that a company which is resident in one of the Contracting States controls or is controlled by a company which is resident in the other Contracting State, or which carries on business in that other State (whether through a permanent establishment or otherwise), shall not of itself constitute either company a permanent establishment of the other.

5. The term “competent authorities” means, in the case of Greece, the Minister of Finance, and in the case of France, the Minister of Finance and the Minister for Economic Affairs, or their duly authorized representatives.

6. In the application of this Convention by one of the Contracting States, any term not defined in the Convention shall, unless the context requires otherwise, have the meaning which it has under the laws in force in that State relating to the taxes which are the subject of this Convention.

Article 3

1. Income from immovable property may be taxed in the Contracting State in which such property is situated.

2. The term “immovable property” shall be defined in accordance with the laws of the Contracting State in which the property in question is situated. The term shall in any case include property accessory to immovable property, livestock and equipment of agricultural and forestry enterprises, rights to which the provisions of general law respecting landed property apply, usufruct of immovable property and rights to variable or fixed payments made as consideration for the working of mineral deposits, mineral springs and other natural resources ; ships, boats and aircraft shall not be regarded as immovable property.

3. The provisions of paragraphs 1 and 2 above shall apply to income derived from the direct use, letting or leasing or use in any other form of immovable property, including income from agricultural or forestry enterprises. They shall likewise apply to profits from the alienation of immovable property.

4. The provisions of paragraphs 1 and 3 above shall also apply to the income from immovable property of enterprises other than agricultural or forestry enterprises and to income from immovable property used for the performance of professional services.

Article 4

1. The profits of an enterprise of one of the Contracting States shall be taxable only in that State unless the enterprise carries on business in the other Contracting State through a permanent establishment situated therein. If the enterprise carries on business as aforesaid, tax may be imposed in the other State on the profits of the enterprise but only on so much of them as is attributable to that permanent establishment.

2. Where an enterprise of one of the Contracting States carries on business in the other Contracting State through a permanent establishment situated therein, there shall in each State be attributed to that permanent establishment the profits which it might be expected to make if it were a distinct and separate enterprise engaged in the same or similar activities under the same or similar conditions and dealing quite independently with the enterprise of which it is a permanent establishment.

3. In the determination of the profits of a permanent establishment, there shall be allowed as deductions expenses which are incurred for the purposes of the permanent establishment, including executive and general administrative expenses so incurred, whether in the Contracting State in which the permanent establishment is situated or elsewhere.

4. If it has been customary in one of the Contracting States to determine the profits to be attributed to a permanent establishment on the basis of an apportionment of the total profits of the enterprise among its various parts, nothing in paragraph 2 of this article shall preclude such Contracting State from determining the profits to be taxed by such an apportionment as may be customary; the method of apportionment adopted shall, however, be such that the result is in accordance with the principles laid down in this article.

5. No profits shall be attributed to a permanent establishment by reason of the mere purchase by that permanent establishment of goods or merchandise for the enterprise.

6. For the purposes of the preceding paragraphs, the profits to be attributed to the permanent establishment shall be determined by the same method year by year, unless there is good and sufficient reason to the contrary.

Article 5

(a) Where an enterprise of one of the Contracting States participates directly or indirectly in the management, control or capital of an enterprise of the other Contracting State, or

(b) The same persons participate directly or indirectly in the management, control or capital of an enterprise of one of the Contracting States and an enterprise of the other Contracting State,

and in either case conditions are made or imposed between the two enterprises in their commercial or financial relations which differ from those which would be made between independent enterprises, then any profits which would, but for those conditions, have accrued to one of the enterprises but by reason of those conditions have not so accrued, may be included in the profits of that enterprise and taxed accordingly.

Article 6

Income derived from the operation of ships in international traffic shall be taxable only in the Contracting State in which such ships are registered or by which they were furnished with nationality papers.

Income derived from the operation of aircraft in international traffic shall be taxable only in the Contracting State in which the place of actual management of the enterprise is situated.

Article 7

1. Income derived from the alienation of an interest in a joint-stock company shall be taxable only in the Contracting State of which the alienor is a resident.

2. Paragraph 1 shall not apply where the interest alienated forms part of the assets of a permanent establishment in the other State owned by the alienor. In that case, article 4 shall apply.

Article 8

1. Companies resident in Greece which maintain a permanent establishment in France shall remain liable in France, in respect of any profits which they distribute, to deduction at source, in accordance with the provisions of article 109-2 of the General Tax Code, of the tax on the income of individuals.

The fraction of the distributed profits actually liable to the above-mentioned deduction may not, however, exceed the amount of the profits realized by the perma-

ment establishment in France as determined for the assessment of the tax payable on the profits of such establishment in accordance with the provisions of this Convention.

2. A company resident in Greece shall not be liable in France to the deduction referred to in paragraph 1 above by reason of its participation in the management or in the capital of a company resident in France or because of any other relationship with that company, but profits distributed by the latter company and liable to such deduction shall, where the case arises, be increased for the purposes of assessing the said deduction by any profits or advantages which the company resident in Greece may have derived indirectly from the company resident in France in the manner referred to in article 5 above, the double taxation of such profits and advantages being avoided in conformity with the provisions of article 21.

Article 9

1. Dividends paid by a company resident in one of the two Contracting States shall be taxable in that State.

However, subject to the provisions of article 21 below, where the recipient of the dividends is a resident of the other Contracting State, the latter State shall retain the right to tax such dividends in conformity with its general legislation, unless the recipient has a permanent establishment in the State in which the dividends arise and the holding producing the dividends is part of that establishment. In that case, article 4 shall apply.

2. The term "dividend" as used in paragraph 1 above means income from shares, founders' shares or other rights, and income from other corporate rights taxed as income from shares under the taxation law of the State of which the company making the distribution is a resident.

Article 10

1. Interest arising in one of the Contracting States and paid to a resident of the other Contracting State shall be taxable in that other State.

2. Nevertheless, a Contracting State in which interest arises which is paid to a resident of the other Contracting State shall retain the right to tax such interest under its own law. If it exercises such right, the rate of tax it charges may not exceed the rates established in paragraph 3 below.

3. (a) In the case of France :

With due regard to the existing provisions of French taxation law, the taxation of interest on negotiable bonds and debentures arising from French sources and paid to residents of Greece shall be limited to 12 per cent. All other interest accruing to residents of Greece shall be exempt from tax in that country.

(b) In the case of Greece :

With due regard to the existing provisions of Greek taxation law, the taxation of interest of any kind arising from Greek sources and paid to residents of France shall not exceed 10 per cent.

4. The term "interest" employed in this article means income from Government securities, from bonds or debentures, whether or not secured by mortgage and whether or not carrying a right to participate in profits, and from debt-claims of every kind, and all other income assimilated by taxation law to income from money lent.

5. The provisions of the foregoing paragraphs shall not apply if the recipient of the interest, being a resident of one of the Contracting States, has in the other Contracting State in which the interest arises a permanent establishment with which the debt-claim from which the interest arises is actually connected. In that case, article 4 shall apply.

Article 11

1. Royalties arising in one of the Contracting States and paid to a resident of the other Contracting State shall be taxable in that other State.

2. Nevertheless, the Contracting State in which the royalties arise shall retain the right under its own law to tax such royalties ; but the rate of tax which it charges may not exceed 5 per cent of the gross amount of the royalties. The competent authorities of the two States shall agree upon the mode of application of that limitation.

3. The term "royalties" employed in this article means payments of any kind received as consideration for the use of, or the right to use, any copyright of literary, artistic or scientific work, or any patent, trade mark, design or model, plan, or secret process or formula, or for the use of, or the right to use, industrial, commercial or scientific equipment or information concerning industrial, commercial or scientific experience.

4. Gains and profits from the alienation of any property or rights mentioned in paragraph 3 shall be taxable only in the Contracting State of which the alienor is a resident.

5. The following shall not be deemed to constitute royalties :

—Variables or fixed payments for the working of mineral deposits, mineral springs and other natural resources. With respect to such income, article 3 concerning the taxation of income from immovable property shall apply ;

— Sums paid for the hire of, or for the right to use, cinematograph films. Such sums shall be taxed in accordance with article 4 concerning the taxation of industrial and commercial profits.

6. The provisions of paragraphs 1, 2 and 4 shall not apply if the recipient of the royalties, being a resident of one of the Contracting States, has in the other Contracting State in which the royalties arise a permanent establishment or fixed base, for the exercise of a profession or other independent activity, with which the right giving rise to the royalties is actually connected. In that case article 4 or article 16 shall apply, according to the case.

7. If a royalty exceeds the intrinsic and normal value of the rights for which it is paid, the limitation provided by paragraph 2 above shall apply, in the debtor's State, only to so much of the royalty as represents such intrinsic and normal value.

Article 12

Subject to the provisions of article 14 below, pensions and life annuities shall be taxable only in the Contracting State of which the recipient is a resident.

Article 13

1. Subject to the provisions of article 14 below, salaries, wages and other similar remuneration received by a resident of one of the Contracting States in respect of paid employment shall be taxable only in that State, unless the employment is exercised in the other Contracting State. If the employment is so exercised, such remuneration as is derived from it may be taxed in that other State.

2. Notwithstanding the provisions of paragraph 1 above, remuneration received by a resident of one of the Contracting States in respect of paid employment exercised in the other Contracting State shall be taxable only in the first-mentioned State if :

(a) The recipient is present in the other State for a period or periods not exceeding in the aggregate 183 days in the fiscal year concerned, and

(b) The remuneration is paid by or on behalf of an employer who is not a resident of the other State ; and

(c) The remuneration is not deducted from the profits of a permanent establishment or fixed base which the employer has in the other State.

3. Notwithstanding the provisions of paragraphs 1 and 2 of this article, remuneration for :

(a) Services performed aboard a ship in international traffic may be taxed in the Contracting State in which the ship is registered or by which it was furnished with nationality papers ;

(b) Services performed aboard an aircraft in international traffic may be taxed in the Contracting State in which the place of actual management of the enterprise is situated.

Article 14

1. Remuneration in the form of salaries, wages, military pay or pensions paid by one of the Contracting States or by a public corporation of that State in respect of present or past administrative or military services shall be taxable in that State.

2. Paragraph 1 shall not apply :

—Where the remuneration is paid to a person possessing the nationality of the other State without at the same time being a national of the first-mentioned State, the remuneration being in that case taxable only in the State of which such person is a resident ;

—Where the remuneration is paid in respect of services rendered in connexion with any trade or business carried on by one of the Contracting States or by a public corporation.

3. The question whether a body corporate is a public corporation shall be determined in accordance with the law of the State in which it is constituted.

Article 15

1. Directors' fees and similar payments received by a resident of one of the Contracting States in his capacity as a member of the board of directors of a company which is a resident of the other Contracting State may be taxed in that other State.

2. Remuneration received by the persons referred to in paragraph 1 in any other capacity shall, according to its nature, be covered by the provisions of article 13 or article 16.

Article 16

1. Income received by a resident of one of the Contracting States in respect of professional services or other independent activities of a similar character shall be taxable only in that Contracting State unless he has a fixed base regularly available to him in the other Contracting State for the purpose of performing his activities. If he has such a fixed base, such part of the income as is attributable to that base may be taxed in the other State.

2. For the purposes of this article, the term "profession" includes, in particular, scientific, artistic, literary, educational or pedagogic activities and the activities of physicians, lawyers, architects and engineers.

Article 17

Payments which a student or trainee from one of the Contracting States who is present in the other Contracting State solely for the purpose of his education or vocational training receives for his maintenance, education or training shall not be taxed in that other State, provided that such payments are made to him from sources outside that other State.

Article 18

Notwithstanding any other provision of this Convention, income derived by public entertainers, such as theatre, motion picture, radio or television artists and musicians, and by athletes, from their personal activities as such may be taxed in the Contracting State in which these activities are carried on.

Article 19

Remuneration received by professors and teachers of one of the Contracting States for instruction given during a period of temporary residence not exceeding two years at a university or other educational establishment of the other State shall be taxable only in the first-mentioned State.

Article 20

Any income not mentioned in the foregoing articles shall be taxable only in the Contracting State of which the recipient is a resident, unless such income is associated with the activity of a permanent establishment owned by the recipient in the other Contracting State.

Article 21

It is agreed that double taxation shall be avoided in the following manner :

A. In the case of France :

1. Income other than that referred to in paragraphs 3 to 5 below shall be exempt from the French taxes mentioned in article 1, paragraph 3A, of this Convention, where the right to tax such income is assigned to Greece.

2. Notwithstanding the provisions of paragraph 1 above, the French taxes referred to in that paragraph may be computed on the basis of the income taxable in France under this Convention, at a rate corresponding to the total income taxable under French law.

3. A resident of France receiving from Greek sources income covered by article 9 from which Greek tax has been deducted shall be granted a tax credit by France.

In the light of the current situation resulting from the taxation law of each Contracting State, the amount of such credit, intended to offset the finally discharged Greek tax, shall be fixed at a flat rate corresponding to that of the tax deducted at the source from dividends in France under the rules of ordinary law.

4. A resident of France receiving from Greek sources interest covered by article 10 from which Greek tax has been deducted as provided in that article, shall be granted a tax credit by France. In the light of the current situation resulting from the taxation law of each Contracting State, the amount of such credit, intended to offset the finally discharged Greek tax, shall be fixed at a flat rate of 10 per cent. The credit shall be applied :

—In the case of interest on negotiable bonds and other debentures :

Against either the tax deducted at the source, or the supplementary tax and tax on the income of individuals, or the company tax, as the case may be, payable by the recipient of the interest under the rules of ordinary law ;

—In the case of interest on all other loans :

Against either the supplementary tax and tax on the income of individuals or the company tax payable by the recipient of the interest in respect of the same income.

5. A resident of France receiving from Greek sources royalties covered by article 11 from which Greek tax has been deducted as provided in that article shall be granted by France a tax credit corresponding to the amount of the Greek tax and applicable against either the supplementary tax and, where appropriate, tax on the income of individuals or the company tax payable by the recipient in respect of the same income.

B. In the case of Greece :

Notwithstanding any other provision of this Convention, Greece may, in determining the taxes payable by persons resident in its territory, include in the base for such taxes all categories of income taxable under Greek taxation law, as though this Convention did not exist. Nevertheless, Greece shall deduct from the taxes thus computed the amount of the French tax payable in respect of income arising in France which is included in the tax bases of both Contracting States, such deduction being limited, however, to that part of the Greek tax which corresponds to the ratio between the income in question and the total income taxable in Greece.

Article 22

1. Nationals of one of the Contracting States shall not be subjected in the other Contracting State to any taxation or any requirement connected therewith which

is other or more burdensome than the taxation and connected requirements to which nationals of that other State in the same circumstances are or may be subjected.

2. In particular, nationals of one of the Contracting States who are liable to taxation in the territory of the other Contracting State shall be granted, on the same terms as nationals of the latter State, any tax exemptions, allowances, reliefs and reductions accorded on grounds of family responsibilities.

3. The term "nationals" means :

(a) In relation to France, all individuals possessing French nationality ;

(b) In relation to Greece, all individuals possessing Greek nationality ;

(c) All bodies corporate, partnerships and associations constituted in accordance with the laws in force in either Contracting State.

4. Stateless persons shall not be subjected in either Contracting State to any taxation or requirement connected therewith which is other or more burdensome than that to which nationals of that State in the same circumstances are or may be subjected.

5. The taxation on a permanent establishment which an enterprise of one of the Contracting States has in the other Contracting State shall not be less favourably levied in that other State than the taxation levied on enterprises of that other State carrying on the same activities in the same conditions.

This provision shall not be construed as obliging either Contracting State to grant to residents of the other Contracting State any personal tax allowances, reliefs or reductions on grounds of circumstances or family responsibilities which it grants to its own residents.

6. Enterprises of one of the Contracting States whose capital is wholly or partly owned or controlled, directly or indirectly, by one or more residents of the other Contracting State shall not be subjected in the first-mentioned Contracting State to any taxation or any requirement connected therewith which is other or more burdensome than that to which similar enterprises of the first-mentioned State are or may be subjected.

7. In this article, the term "taxation" means taxes of every kind and description.

Article 23

1. The tax authorities of the Contracting Parties shall exchange such information as is available under the taxation law of the two States in the normal course of administration and is of use in ensuring the regular assessment and collection of the taxes

referred to in this Convention and the application, in respect of those taxes, of the statutory provisions relating to the prevention of tax fraud.

2. Any information so exchanged shall be treated as secret and shall not be disclosed to any persons other than those responsible for the assessment and collection of the taxes referred to in this Convention. No information shall be exchanged which would disclose any business, industrial or professional secret. Assistance may not be given where the requested State considers that it would be such as to endanger its sovereignty or security or to prejudice its general interests.

3. The exchange of information may take place either *ex officio* or, in particular cases, on request. The competent authorities of the Contracting States shall consult together to determine the information to be exchanged *ex officio*.

Article 24

1. The Contracting States agree to render each other assistance and support in the collection, in accordance with their laws or regulations, of the taxes which are the subject of this Convention, and of any surcharges, overdue payment penalties, interest and costs relating to such taxes, where these sums are finally due under the laws or regulations of the requesting State.

2. Requests made for such assistance shall be accompanied by the documents required under the laws or regulations of the requesting State as evidence that the sums to be collected are finally due.

3. On receipt of these documents, writs shall be served and measures of recovery and collection instituted in the requested State in accordance with the laws and regulations governing the recovery and collection of its own taxes.

4. Tax debts to be recovered shall enjoy the same guarantees and privileges as tax debts of the same nature in the State in which recovery is made.

5. Appeals concerning the existence or the amount of a debt shall lie only to the competent tribunal of the requesting State.

Article 25

Where a tax debt is still subject to appeal, the tax authorities of the creditor State may, in order to protect its rights, request the competent tax authorities of the other State to take such interim measures as the latter's rules and regulations may authorize.

Article 26

1. Where a resident of one of the Contracting States considers that action of one or both of the two Contracting States has resulted or will result in his case in

taxation inconsistent with the provisions of this Convention, he may, independently of the remedies provided by national laws, submit his case to the authority of the Contracting State of which he is a resident.

2. If it considers the objection to be justified and if it is not itself able to arrive at a satisfactory solution, the said authority shall endeavour to resolve the case by amicable agreement with the competent authority of the other Contracting State with a view to avoidance of taxation inconsistent with the provisions of this Convention.

3. The competent authorities of the Contracting States shall endeavour to resolve by amicable agreement any difficulties or doubts arising in the interpretation of this Convention. They may also consult together with a view to avoiding double taxation in cases not provided for.

4. The competent authorities of the Contracting States shall communicate with each other directly for the purpose of reaching agreement as indicated in the foregoing paragraphs. Where it appears that agreement would be facilitated by an oral exchange of views, such an exchange may be effected through a mixed commission consisting of representatives of the competent authorities of the Contracting States.

Article 27

1. This Convention may be extended, in its present form or with such amendments as may be necessary, to any overseas territories of the French Republic which levy taxes similar to those to which this Convention applies. The extension shall take effect from such date, and subject to such amendments and conditions (including those relating to termination) as may be determined by agreement between the Contracting States through an exchange of diplomatic notes or by any other procedure consistent with the constitutional provisions of the Contracting States.

2. Save as otherwise agreed by the Contracting States, the denunciation of this Convention under article 31 below by either of them shall terminate the application of its provisions to any territory to which it may have been extended in conformity with this article.

Article 28

The competent authorities of the two Contracting States shall consult together to determine by agreement, so far as may be necessary, the procedures for the application of this Convention.

Article 29

With the entry into force of this Convention, the Agreement concluded between the Contracting States by exchange of letters dated 9 December 1950¹ for the relief from double taxation of profits derived from air and sea transportation shall cease to have effect.

Article 30

1. This Convention shall be ratified and the instruments of ratification shall be exchanged at Athens as soon as possible.

It shall enter into force one month after the exchange of the instruments of ratification and its provisions shall apply for the first time to the taxation of income accruing during the calendar year in which the instruments of ratification are exchanged or during fiscal years ending in the course of that year.

Article 31

This Convention shall remain in force unless it is denounced by one of the Contracting States.

After the fifth year following that of ratification, however, either Contracting State may denounce it in whole or in part by giving six months' notice through the diplomatic channel, the denunciation to take effect from the end of the calendar year.

In that event, the Convention shall apply for the last time to the taxation of income accruing during the calendar year in which the denunciation takes place.

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

DONE at Athens on 21 August 1963 in two original copies, in the French language.

For His Majesty
the King of the Hellenes :

P. PIPINELIS

For the President
of the French Republic :

G. CHARBONNIÈRES

¹ United Nations, *Treaty Series*, Vol. 166, p. 314.