

No. 8014

**GREECE
and
ETHIOPIA**

Exchange of notes constituting an agreement on reciprocal tax exemptions on income earned by Greek and Ethiopian maritime shipping enterprises. Addis Ababa, 7 November 1962

Official text : English.

Registered by Greece on 29 December 1965.

**GRÈCE
et
ÉTHIOPIE**

Échange de notes constituant une convention tendant à exonérer réciproquement d'impôt les revenus des entreprises grecques et éthiopiennes de transports maritimes. Addis-Abéba, 7 novembre 1962

Texte officiel anglais.

Enregistré par la Grèce le 29 décembre 1965.

No. 8014. EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT¹ BETWEEN GREECE AND ETHIOPIA ON RECIPROCAL TAX EXEMPTIONS ON INCOME EARNED BY GREEK AND ETHIOPIAN MARITIME SHIPPING ENTERPRISES. ADDIS ABABA, 7 NOVEMBER 1962

I

IMPERIAL ETHIOPIAN GOVERNMENT
MINISTRY OF FOREIGN AFFAIRS

November 7, 1962

The Ministry of Foreign Affairs of the Imperial Ethiopian Government present their compliments to the Royal Embassy of Greece and have the honour to inform the Embassy that, in order to avoid the double taxation of profits derived from maritime shipping and to encourage commercial maritime shipping between the Kingdom of Greece and the Empire of Ethiopia, the Empire of Ethiopia is prepared to conclude with the Kingdom of Greece an Agreement on the following terms :

1. The Imperial Ethiopian Government, by virtue of the powers vested in them under Article 16 of the Personal and Business Tax Proclamation, 1949 (Proclamation No. 107 of 1949), Article 17 (*h*) of the Income Tax Decree, 1956 (Decree No. 19 of 1956) and Article 72 of the Income Tax Proclamation, 1961 (Proclamation No. 173 of 1961), shall exempt, on the basis of reciprocity, Greek maritime shipping enterprises from the payment of tax due on profits resulting from the operation of sea-going vessels in international traffic.

2. The Government of the Kingdom of Greece shall exempt, on the basis of reciprocity, Ethiopian maritime shipping enterprises from the payment of tax due on profits resulting from the operation of sea-going vessels in international traffic.

3. (*a*) The expression "Greek maritime shipping enterprises" used in paragraph 1 hereof shall mean Greek vessels registered in accordance with Greek law.

¹ Came into force on 7 November 1962 by the exchange of the said notes. The instrument of ratification of the agreement by Greece was communicated to the Ethiopian Government on 15 October 1965, in accordance with the penultimate paragraph of the note.

(b) The expression " Ethiopian maritime shipping enterprises " used in paragraph 2 hereof shall mean Ethiopian vessels registered in accordance with Ethiopian law.

4. This Agreement shall remain in force for an indefinite period of time and until either Government notifies the other Government of its intention to terminate said Agreement, in which case said Agreement shall terminate six (6) months following the date of receipt of the notice of termination ; provided, however, that said Agreement shall in any case remain in effect until the end of the fiscal year in force at the time of the effective date of termination.

5. The exemption granted by this Agreement shall be retroactive to all income earned subsequent to 1 January, 1954.

If the Government of the Kingdom of Greece is in agreement with the above, this Note, together with the reply Note of the Royal Embassy of Greece, shall constitute a valid and binding agreement between the Imperial Ethiopian Government and the Government of the Kingdom of Greece.

The Agreement contained in said Notes shall, if required by the constitution or laws of either the Empire of Ethiopia or the Kingdom of Greece, be ratified in accordance with such requirements, and instruments of ratification shall be exchanged at Addis Ababa promptly upon completion of such ratification procedures ; provided, however that until such ratification, said agreement shall be deemed to be in full force and effect and shall be implemented as if such instruments of ratification had been already exchanged.

The Ministry of Foreign Affairs avail themselves of this opportunity to renew to the Royal Embassy of Greece the assurances of their high consideration.

Ketema YIFRU
Minister of State for Foreign Affairs

The Royal Embassy of Greece
Addis Ababa

II

AMBASSADE ROYALE DE GRÈCE EN ÉTHIOPIE ¹

No. 1029.

The Royal Greek Embassy presents its compliments to the Ministry of Foreign Affairs of the Imperial Ethiopian Government and has the honour to acknowledge receipt of their Note Verbale No. 275(4)55 under today's date reading as follows :

[See note I]

¹ Royal Greek Embassy in Ethiopia.

The Royal Greek Embassy has the honour, on behalf of the Royal Greek Government, to inform the Ministry for Foreign Affairs of the Imperial Ethiopian Government of their agreement.

The Royal Greek Embassy avails itself of this opportunity to renew to the Ministry of Foreign Affairs of the Imperial Ethiopian Government the assurances of its highest consideration.

Addis Ababa, November 7th, 1962

Demetre GIANNOPOULOS
Chargé d'Affaires of Greece

To the Imperial Ministry of Foreign Affairs
Addis Ababa

III

IMPERIAL ETHIOPIAN GOVERNMENT
MINISTRY OF FOREIGN AFFAIRS

November, 7, 1962

Dear Mr. Chargé d'Affaires,

I have the honour to refer to notes exchanged today concerning the reciprocal tax exemptions to be accorded by the Imperial Ethiopian Government and the Royal Greek Government on income earned by Greek and Ethiopian air and sea carriers.

I wish to confirm the understanding of my Government that all vessels registered in Greece are, under terms of Greek legislation, beneficially owned by Greek citizens.

I further wish to confirm the agreement of my Government that the exemption granted by the Royal Greek Government shall apply only to Ethiopian vessels registered in accordance with Ethiopian law which are beneficially owned by Ethiopian nationals or by the Imperial Ethiopian Government.

I avail myself of this opportunity to renew to you, Mr. Chargé d'Affaires, the assurances of my high consideration.

Ketema YIFRU
Minister of State for Foreign Affairs

Mr. D. Giannopoulos
Chargé d'Affaires of the Royal Embassy of Greece
Addis Ababa

IV

AMBASSADE ROYALE DE GRÈCE EN ÉTHIOPIE ¹

No. 1035

Addis Ababa, November 7th, 1962

Your Excellency,

I have the honour to acknowledge receipt of your letter No. 276(4)55, dated November 7th, 1962 reading as follows :

[See note III]

I wish to inform You, on behalf of the Royal Greek Government, of our agreement.

I avail myself of this opportunity to renew to You, Your Excellency, the assurances of my highest consideration.

Demetre GIANNOPOULOS
Chargé d'Affaires of Greece

His Excellency Ato Ketema Yifru
Minister of State for Foreign Affairs
Addis Ababa

¹ Royal Greek Embassy in Ethiopia.