

No. 10032

**GREECE
and
SYRIA**

**Agreement for the avoidance of double taxation on income
deriving from maritime and air transport operations.
Signed at Athens on 17 October 1968**

Authentic text: French.

Registered by Greece on 19 November 1969.

**GRÈCE
et
SYRIE**

**Accord tendant à éviter la double imposition en matière
d'impôt sur les revenus provenant de l'exercice de la
navigation maritime et aérienne. Signé à Athènes le
17 octobre 1968**

Texte authentique: français.

Enregistré par la Grèce le 19 novembre 1969.

[TRANSLATION — TRADUCTION]

AGREEMENT¹ BETWEEN THE KINGDOM OF GREECE AND
THE SYRIAN ARAB REPUBLIC FOR THE AVOIDANCE
OF DOUBLE TAXATION ON INCOME DERIVING FROM
MARITIME AND AIR TRANSPORT OPERATIONS

The Government of the Syrian Arab Republic and the Government of the Kingdom of Greece, desiring to avoid the double taxation of income deriving from operations in international traffic, have agreed on the following provisions:

Article I

Income deriving from the operation of ships in international traffic shall be taxable only in the Contracting State in whose territory the said ships are registered or which has provided them with certificates of registry.

Article II

Income deriving from the operation of aircraft in international traffic shall be taxable only in the Contracting State in which the headquarters of the actual management of the enterprise are situated.

Article III

This Agreement shall be ratified or approved, in accordance with the constitutional provisions of each Contracting Party, and shall enter into force on the date of the exchange of diplomatic notes to that effect.

The provisions of this Agreement shall apply to the income earned as from 1 January of the year in which the instruments of ratification are exchanged.

This Agreement may be denounced by either Contracting Party at six months' notice. In such event, it shall cease to have effect with regard to the income earned in any financial or accounting year beginning after the date of expiry.

DONE at Athens on 17 October 1968, in duplicate, in the French language.

For the Government
of the Kingdom of Greece :

N. TOTSIS

For the Government
of the Syrian Arab Republic :

Ibrahim KHOURY

¹ Came into force on 4 August 1969 by the exchange of the instruments of ratification, which took place at Athens, in accordance with article III.