

No. 27064

**UNION OF SOVIET SOCIALIST REPUBLICS
and
SWITZERLAND**

Exchange of notes constituting an agreement on tax exemption in respect of sea and air transport enterprises. Moscow, 18 January 1968

Authentic texts: Russian and French.

Registered by the Union of Soviet Socialist Republics on 25 January 1990.

**UNION DES RÉPUBLIQUES
SOCIALISTES SOVIÉTIQUES
et
SUISSE**

Échange de notes constituant un accord relatif à l'exonération d'impôts de navigation maritime ou aérienne. Moscou, 18 janvier 1968

Textes authentiques : russe et français.

Enregistré par l'Union des Républiques socialistes soviétiques le 25 janvier 1990.

[TRANSLATION — TRADUCTION]

EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT¹ BETWEEN THE UNION OF SOVIET SOCIALIST REPUBLICS AND SWITZERLAND ON TAX EXEMPTION IN RESPECT OF SEA AND AIR TRANSPORT ENTERPRISES

I

No. 6/100

The Ministry of Foreign Affairs of the Union of Soviet Socialist Republics presents its compliments to the Embassy of Switzerland and, further to the agreement reached on reciprocal tax exemption in respect of sea and air transport enterprises of the two countries, has the honour to inform it of the following:

1. The Soviet Government declares, subject to reciprocity, that Swiss sea and air transport enterprises shall be exempt in the Soviet Union from all taxes on income and profits derived from sea or air transport operations; such exemption shall also apply to taxes on movable property, including ships and aircraft operated by such enterprises.

2. The exemption provided for in paragraph 1 shall apply to taxes levied in the Soviet Union in respect of all calendar years beginning after 31 December 1966.

3. The Soviet Government reserves the right to revoke this declaration at the end of a calendar year by giving at least six months' notice thereof in writing; in that event, the exemption shall be applied for the last time in respect of Soviet taxes levied for that calendar year.

The Ministry takes this opportunity, etc.

Moscow, 18 January 1968

Embassy of Switzerland
Moscow

¹ Came into force on 18 January 1968 by the exchange of notes.

II

EMBASSY OF SWITZERLAND

The Embassy of Switzerland presents its compliments to the Soviet Ministry of Foreign Affairs and, further to the agreement reached between the two countries on tax exemption in respect of sea and air transport enterprises, has the honour to inform it, on instructions from its Government, of the following:

1. The Swiss Federal Council, in exercise of the powers conferred on it by the Federal Order of 1 October 1952 authorizing it to exchange statements of reciprocity on the taxation of sea, inland waterway and air transport enterprises, declares, subject to reciprocity, that Soviet sea and air transport enterprises shall be exempt in Switzerland from all taxes (federal, cantonal and local) on income and profits derived from sea or air transport operations; such exemption shall also apply to taxes (federal, cantonal and local) on movable property, including ships and aircraft operated by such enterprises.

2. The exemption provided for in paragraph 1 shall apply to taxes levied in Switzerland in respect of all calendar years beginning after 31 December 1966.

3. The Swiss Federal Council reserves the right to revoke this declaration at the end of a calendar year by giving at least six months' notice thereof in writing; in that event, the exemption shall be applied for the last time in respect of Swiss taxes levied for that calendar year.

The Embassy of Switzerland takes this opportunity, etc.

Moscow, 18 January 1968

Soviet Ministry of Foreign Affairs
Moscow
