

N° 1831.

**GRANDE-BRETAGNE
ET IRLANDE DU NORD
ET ISLANDE**

Accord en vue de l'exemption de
l'impôt sur le revenu en ce qui
concerne les bénéfices réalisés dans
les affaires d'armement maritime.
Signé à Londres, le 27 avril 1928.

**GREAT BRITAIN
AND NORTHERN IRELAND
AND ICELAND**

Agreement for the Exemption of
Shipping Profits from Double
Taxation. Signed at London,
April 27, 1928.

No. 1831. — AGREEMENT BETWEEN HIS BRITANNIC MAJESTY'S GOVERNMENT IN GREAT BRITAIN AND THE ICELANDIC GOVERNMENT FOR THE EXEMPTION OF SHIPPING PROFITS FROM DOUBLE TAXATION. SIGNED AT LONDON, APRIL 27, 1928.

Textes officiels anglais et islandais communiqués par le Ministère des Affaires étrangères de Sa Majesté britannique. L'enregistrement de cet accord a eu lieu le 22 août 1928.

English and Icelandic official texts communicated by His Britannic Majesty's Foreign Office. The registration of this Agreement took place August 22, 1928.

TEXTE ISLANDAIS. — ICELANDIC TEXT.

HIS BRITANNIC MAJESTY'S GOVERNMENT IN GREAT BRITAIN and THE ROYAL ICELANDIC GOVERNMENT, being desirous of ensuring the reciprocal exemption from income tax in certain cases of profits accruing from the business of shipping, the following agreement has been concluded :

KONUNGLEG RÍKISSTJÓRN ISLANDS og STJÓRN HANS HÁTIGNAR BRETAKONUNGS á STÓRA-BRETLANDI óska að tryggja gagnkvæmar undanþágur frá tekjuskatti í vissum tilfellum er um arð af skipaútgærd er að ræða, og hefir því orðið samkomulag um eftirfarandi samning :

Article 1.

His Britannic Majesty's Government in Great Britain agree to take the necessary steps under Section 18 of the Act of Parliament of the United Kingdom known as the Finance Act, 1923, for exempting from income tax (including supertax) chargeable in Great Britain and Northern Ireland for the year of assessment 1923-24 commencing on the 6th day of April, 1923, and for every subsequent year of assessments, any profits which accrue from the business of shipping carried on by an individual resident in Iceland or by a company managing and controlling such business in Iceland. The arrangements made in accordance with this Article shall cease to have effect if and so soon as the laws of Iceland cease to give the relief indicated in Article 2.

1. Grein.

Stjórn Hans Hátignar Bretakonungs á Stóra-Bretlandi felst á að gera nauðsynlegar ráðsstaðanir samkvæmt 18. grein laga hins samcínaða konungsríkis, sem ganga undir nafninu " the Finance Act, 1923," til þess að undanþiggja tekjuskatti (aukaskattur innifakinn) sem greiða ber á Stóra-Bretlandi og Norður-Irlandi skattárið 1923-24, er byrjar 6. apríl 1923, og öll skattár þar á eftir, allan arð sem stafar frá skipaútgærd sem rekin er af einstaklingi búsettum á Islandi eða af fjelagi sem rekur slíka atvinnu og stjórnar henni á Islandi. Samkomulagið sem felst í þessari grein fellur úr gildi ef og þegar er íslensk lög hættu að veita þau hlunnindi sem um ræðir í 2. grein.

Article 2.

The Royal Icelandic Government have declared that under the laws of the Kingdom of

2. Grein.

Konunglega íslenska ríkisstjórnin hefir lýst því yfir, að samkvæmt lögum konungsríkisins

Iceland regarding income tax and property tax, tax is not chargeable in respect of profits which accrue from the business of shipping carried on by an individual resident in Great Britain or Northern Ireland or by a company managing and controlling such business in Great Britain or Northern Ireland.

Islands um tekju- og eignaskatt, sje ekki hægt að leggja skatt á arð, sem stafar frá skipaútgæð sem rekin er af einstaklingi búsettum á Stóra-Bretlandi eða Norður-Irlandi eða af fjelagi, sem rekur slíka atvinnu og stjórnar henni á Stóra-Bretlandi eða Norður-Irlandi.

Article 3.

3. Grein.

The expression "the business of shipping" means the business carried on by an owner of ships, and for the purposes of this definition the expression "owner" includes any charterer.

Orðið "skipaútgæð" merkir atvinnu rekna af eiganda skips, og þessu til frekari skýringar tekur orðið "eigandi" einnig til leigutaka skipa.

In witness whereof the undersigned have signed the present agreement and have affixed thereto their seals.

Þessu til staðfestu hafa undirritaðir undirskri-
fað samning þenna og sett við innsigli sín.

Done in duplicate at London this twenty-seventh day of April 1928.

Gert í tveim eintökum í London þann tuttuga-
gasta og sjöunda dag aprílmánaðar 1928.

(L. S.) Austen CHAMBERLAIN.

For Iceland :

(L. S.) P. Ahlefeldt LAURVIG.

Danish Minister.