

N° 2531.

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DANEMARK ET PAYS-BAS

Accord en vue d'exempter réciproquement de l'impôt sur le revenu certains bénéfices provenant des entreprises de navigation maritime. Signé à La Haye, le 8 novembre 1930.

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DENMARK  
AND THE NETHERLANDS

Agreement for the reciprocal Exemption from Income Tax of certain Profits accruing from the Business of Shipping. Signed at The Hague, November 8, 1930.

<sup>1</sup> TRADUCTION. — TRANSLATION.

No. 2531. — AGREEMENT BETWEEN DENMARK AND THE NETHERLANDS FOR THE RECIPROCAL EXEMPTION FROM INCOME TAX OF CERTAIN PROFITS ACCRUING FROM THE BUSINESS OF SHIPPING. SIGNED AT THE HAGUE, NOVEMBER 8, 1930.

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*French official text communicated by the Permanent Delegate of Denmark accredited to the League of Nations and the Netherlands Minister at Berne. The registration of this Treaty took place November 18, 1930.*

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THE ROYAL DANISH GOVERNMENT and THE ROYAL GOVERNMENT OF THE NETHERLANDS, being desirous of concluding an agreement for the reciprocal exemption from income tax, in certain cases, of profits accruing from a shipping business, have agreed upon the following provisions :

*Article 1.*

The Royal Government of the Netherlands declares that, under the laws of the Netherlands relating to income tax (Law of December 19, 1914, *Legal Gazette* No. 563, Articles 12 (a), 16, 17 and 18 and Law of July 15, 1929, *Legal Gazette* No. 388), any profits which accrue from a shipping business carried on by an individual resident in Denmark or by a company having its seat within Danish territory shall not be liable to income tax.

*Article 2.*

The Royal Government of the Netherlands declares that, under the Law of the Netherlands relating to the Tax on Dividends and Fees (Law of January 11, 1918, *Legal Gazette* No. 4), any profits which accrue from a shipping business carried on by an individual resident in Denmark or by a company having its seat within Danish territory shall not be liable to income tax.

*Article 3.*

In view of the provisions in Articles 1 and 2, the Royal Danish Government declares that, under the provisions of Article 50 of Law No. 149 dated April 10, 1922 and of Article 27 of Law No. 73 dated March 29, 1924, persons resident in the Netherlands and companies and institutions whose head offices are situated within the territory of the Netherlands shall be exempt from the obligation to pay taxes on profits accruing from ships putting in at Danish ports.

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<sup>1</sup> Traduit par le Secrétariat de la Société des Nations, à titre d'information.

<sup>1</sup> Translated by the Secretariat of the League of Nations, for information.

*Article 4.*

The term "shipping business" shall be held to mean "the business carried on by a ship owner"; for the purpose of this definition the expression "owner" includes any charterer.

*Article 5.*

The present Agreement shall come into force on the date of signature and may be denounced by either High Contracting Party at any time at six months' notice.

In faith whereof the undersigned, being duly authorised for this purpose, have signed the present Agreement and have thereto affixed their seals.

Done in duplicate at The Hague, November 8, 1930.

(L. S.) (*Signed*) Harald SCAVENIUS.

(L. S.) (*Signed*) BEELAERTS v. BLOKLAND.