

N° 2702.

GRÈCE 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 Athènes, le 5 décembre 1930.

GREECE AND THE NETHERLANDS

Agreement for the reciprocal Exemption from Income Tax in certain Cases of Profits accruing from the Business of Shipping. Signed at Athens, December 5, 1930.

¹ TRADUCTION. — TRANSLATION.No. 2702. — AGREEMENT² BETWEEN GREECE AND THE NETHERLANDS FOR THE RECIPROCAL EXEMPTION FROM INCOME-TAX IN CERTAIN CASES OF PROFITS ACCRUING FROM THE BUSINESS OF SHIPPING. SIGNED AT ATHENS, DECEMBER 5, 1930.

French official text communicated by the Netherlands Minister at Berne. The registration of this Agreement took place May 12, 1931.

THE ROYAL GOVERNMENT OF THE NETHERLANDS and THE GREEK GOVERNMENT, being desirous of concluding an Agreement for the reciprocal exemption from income-tax in certain cases of profits accruing from the business of shipping, have agreed on the following provisions :

Article 1.

The Royal Government of the Netherlands declares that under the Netherlands laws regarding income-tax (Law of December 19, 1914, Legal Gazette, No. 563 ; Articles 12 (*a*), 16, 17 and 18 of the Law of July 15, 1929, Legal Gazette No. 388) any profits which accrue from the business of shipping carried on by an individual resident in Greece or by a company managing and controlling such business in Greek territory shall not be liable to income-tax.

Article 2.

The Royal Government of the Netherlands declares that under the Netherlands Law regarding the tax on dividends and fees (Law of January 11, 1918, Legal Gazette, No. 4) any profits which accrue from the business of shipping carried on by an individual resident in Greece or by a company managing and controlling such business in Greek territory shall not be liable to the tax. In the event of a tax on business licences being instituted in the Netherlands, a similar exemption shall be granted.

Article 3.

In view of the provisions in Articles 1 and 2, the Greek Government declares that under Article 18, Section 5, paragraph 8, of the code of taxation payable on net income (Decree of September 6, 1929, published in the Official Gazette of September 10, 1929, No. 341) and of Article 6, paragraph 8, of the code of taxation payable on business licences (Decree of September 6, 1929, published in the Official Gazette of September 10, 1929, No. 342), individuals resident in

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

¹ Translated by the Secretariat of the League of Nations, for information.

² Came into force March 23, 1931.

the Netherlands and companies and institutions managed and controlled in Netherlands territory shall be exempted from taxation in respect of profits earned by vessels calling at Greek ports, and also from taxation in respect of business licences.

Article 4.

The exemptions reciprocally granted by this Agreement shall be applied as from June 15, 1925.

Article 5.

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.

Article 6.

The present Agreement shall come into force on the date of publication in the Official Gazette of the Greek law ratifying the present Agreement, and may be denounced by either High Contracting Party at any time by giving six months' notice.

In faith whereof the undersigned, duly authorised to that effect, have signed the present Agreement and have thereto affixed their seals.

Done in duplicate at Athens, December the fifth, one thousand nine hundred and thirty.

(L. S.) C. D. SCHULLER TOT PEURSUM.

(L. S.) A. MICHALAKOPOULOS.
