

N° 2579.

BELGIQUE ET FRANCE

Convention ayant pour but d'éviter
la double imposition des revenus
des entreprises de navigation mari-
time des deux pays. Signée à
Bruxelles, le 7 octobre 1929.

BELGIUM AND FRANCE

Convention for the Prevention of
Double Taxation on Profits accru-
ing from the Business of Shipping
in the two Countries. Signed at
Brussels, October 7, 1929.

¹ TRADUCTION. — TRANSLATION.

No. 2579. — CONVENTION ² BETWEEN BELGIUM AND THE FRENCH REPUBLIC FOR THE PREVENTION OF DOUBLE TAXATION ON PROFITS ACCRUING FROM THE BUSINESS OF SHIPPING IN THE TWO COUNTRIES. SIGNED AT BRUSSELS, OCTOBER 7, 1929.

French official text communicated by the Belgian Minister for Foreign Affairs. The registration of this Convention took place January 1, 1931.

THE GOVERNMENT OF HIS MAJESTY THE KING OF THE BELGIANS and THE GOVERNMENT OF THE FRENCH REPUBLIC, being desirous of protecting maritime shipping undertakings domiciled in one of the two countries and operating in the other from the burden of double taxation of income derived from their shipping business, have decided to conclude a Convention based on the principle of reciprocity. The undersigned, being duly authorised thereto, have agreed on the following provisions :

Article 1.

Maritime shipping undertakings which have their effective centre of management in Belgium and whose vessels flying the Belgian flag call at French ports to take on or land cargo or passengers shall be exempted in France from payment of the taxes on income or profits derived from such shipping business.

By reciprocity, maritime shipping undertakings which have their effective centre of management in France and whose ships flying the French flag call at Belgian ports to take on or land cargo or passengers, shall be exempted in Belgium from payment of the taxes on income or profits derived from such shipping business.

Article 2.

The term " maritime shipping undertakings " shall mean undertakings directed by a " ship-owner ", the term " shipowner " including any charterer.

Article 3.

Income or profits from shipping business shall also include income or profits derived from the sale of passage tickets in the country in which the undertaking issuing such tickets does not have its registered office.

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 The exchange of ratifications took place at Paris, September 13, 1930.

Article 4.

The reciprocal exemption provided for in Article 1 concerns :

In Belgium, the personal tax on income from invested capital and the business tax on profits from industrial, commercial and agricultural concerns ;

In France, the tax on industrial and commercial profits instituted by Part I of the Law of July 31, 1917, and the income tax imposed by the Law of June 29, 1872, and the Decree of December 6, 1872, on foreign companies whose shares are not quoted but which deal in movable or immovable property situated in France.

Article 5.

The present Convention shall be ratified and the ratifications shall be exchanged at Paris. It shall come into force on January 1st of the year following that during which it has been ratified.

It may be denounced at any time, at six months' notice.

In faith whereof the undersigned Plenipotentiaries have signed the present Convention and have affixed their seals thereto.

Done at Brussels, October 7, 1929.

(L. S.) (*Signed*) HYMANS.

(L. S.) (*Signed*) Maurice HERBETTE.