

N° 4060.

GRANDE-BRETAGNE
ET IRLANDE DU NORD
ET GRÈCE

Accord relatif à l'exemption réciproque de la double imposition en ce qui concerne certains bénéfices ou gains réalisés par l'intermédiaire d'une agence. Signé à Athènes, le 17 septembre 1936.

GREAT BRITAIN
AND NORTHERN IRELAND
AND GREECE

Agreement for the Reciprocal Exemption from Income Tax on Certain Profits or Gains arising through an Agency. Signed at Athens, September 17th, 1936.

No. 4060. — AGREEMENT BETWEEN HIS MAJESTY'S GOVERNMENT IN THE UNITED KINGDOM AND THE GOVERNMENT OF GREECE FOR THE RECIPROCAL EXEMPTION FROM INCOME TAX ON CERTAIN PROFITS OR GAINS ARISING THROUGH AN AGENCY. SIGNED AT ATHENS, SEPTEMBER 17TH, 1936.

English and Greek official texts communicated by His Majesty's Secretary of State for Foreign Affairs in Great Britain. The registration of this Agreement took place February 11th, 1937.

THE GOVERNMENT OF THE UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND and THE GOVERNMENT OF THE KINGDOM OF GREECE, being desirous of concluding an Agreement for reciprocal exemption from Income Tax in certain cases of profits or gains arising through an agency, have appointed to that end as their Plenipotentiaries :

THE GOVERNMENT OF THE UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND :

His Excellency Sir Sydney WATERLOW, K.C.M.G., C.B.E., Envoy Extraordinary and Minister Plenipotentiary of His Britannic Majesty ;

THE GOVERNMENT OF THE KINGDOM OF GREECE :

His Excellency M. Nicolas MAVROUDIS, Permanent Under-Secretary of State for Foreign Affairs ;

Who, having communicated to each other their full powers, found to be in due form, have agreed as follows :

Article 1.

The Government of the United Kingdom of Great Britain and Northern Ireland undertake that the profits or gains to which this Article relates shall, so long as the exemption specified in Article 2 hereof remains effective, be exempted from Income Tax (including Surtax) chargeable in the United Kingdom for the year of assessment commencing on the sixth day of April, nineteen hundred and thirty-six, and for every subsequent year of assessment, and will take the necessary action under section 17 of the Act of Parliament of the United Kingdom, known as the Finance Act, 1930, with a view to giving the force of law to the exemption aforesaid.

The profits or gains to which this Article relates are any profits or gains arising, whether directly or indirectly, through an agency in the United Kingdom to a person who is resident in the territory of the Kingdom of Greece and is not resident in the United Kingdom, unless the profits or gains either :

- (1) Arise from the sale of goods from a stock in the United Kingdom ; or

(2) Accrue, directly or indirectly, though any branch or management in the United Kingdom or through an agency in the United Kingdom where the agent has and habitually exercises a general authority to negotiate and conclude contracts.

Article 2.

The Government of the Kingdom of Greece undertake that the profits or gains to which this Article relates shall, so long as the exemption specified in Article 1 hereof remains effective, be exempted from trading tax and income tax chargeable in Greece as from the sixth day of April, nineteen hundred and thirty-six, and thereafter, and will take the necessary steps with a view to giving the force of law to the exemption aforesaid.

The profits or gains to which this Article relates are any profits or gains arising, whether directly or indirectly, through an agency in the territory of the Kingdom of Greece to a person who is resident in the United Kingdom and is not resident in the territory of the Kingdom of Greece, unless the profits or gains either :

(1) Arise from the sale of goods from a stock in the Kingdom of Greece ; or

(2) Accrue, directly or indirectly, through any branch or management in the territory of the Kingdom of Greece or through an agency in the territory of the Kingdom of Greece where the agent has and habitually exercises a general authority to negotiate and conclude contracts.

Article 3.

For the purposes of this Agreement the word " person " includes any body of persons, corporate or not corporate, and a body corporate shall be regarded as resident in the United Kingdom if its business is managed and controlled in the United Kingdom, and shall be regarded as resident in the territory of the Kingdom of Greece if its business is managed and controlled in the territory of the Kingdom of Greece.

Article 4.

This Agreement shall come into force on the date of signature and may be denounced at any time upon six months' notice being given by one Contracting Party to the other.

In witness whereof the above-named Plenipotentiaries have signed the present Agreement and affixed thereto their seals.

Done at Athens in duplicate, in the English and Greek languages, the 17th day of September, 1936.

(L. S.) Sydney WATERLOW.

(L. S.) N. MAVROUDIS.