



591

TREATY SERIES No. 9 (1925).

AGREEMENT

between

GREAT BRITAIN AND DENMARK

for the

**Reciprocal Exemption from Income Tax in
certain cases of Profits accruing from the
Business of Shipping.**

Signed at London, December 18, 1924.

*Presented by the Secretary of State for Foreign Affairs to Parliament
by Command of His Majesty.*

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**Agreement between Great Britain and Denmark
for the Reciprocal Exemption from Income Tax
in certain cases of Profits accruing from the
Business of Shipping.**

Signed at London, December 18, 1924.

His Britannic Majesty's Government and the Royal Danish 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 as follows:—

Da den kongelige danske Regering og den kongelige britiske Regering ønsker at afslutte en Overenskomst angaaende gensidig Fritagelse i visse Tilfælde for Indkomstskat af Udbytte, som hidrører fra Rederivirksomhed, er de blevet enige om følgende:

ARTICLE 1.

The Government of His Britannic Majesty 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 super-tax) 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 assessment, any profits which accrue from the business of shipping carried on by an individual resident in Denmark or by a company managing and controlling such business in Denmark.

ARTIKEL 1.

Den kongelige britiske Regering indgaar, i Henhold til Section 18 i den af det Forenede Kongeriges Parlament vedtagne Lov, kaldet "Finansloven af 1923," paa at tage de fornødne Skridt til at fritage for Indkomstskat (indbefattet Tillægsskat), at erlægge i Storbritannien og Nordirland for Skatteansættelsesaaet 1923-24, der begynder den 6' April 1923, og for hvert følgende Skatteansættelsesaar, ethvert Udbytte, som hidrører fra Rederivirksomhed, der udøves af en i Danmark bosiddende Person, eller af et Selskab, der i Danmark leder og kontrollerer saadan Virksomhed.

ARTICLE 2.

The Royal Danish Government agree to take the necessary steps under article 50 of the laws of the Kingdom of Denmark No. 149 of the 10th April, 1922, for exempting from income tax chargeable in Denmark for the tax year 1923-24 commencing on the 1st day of April, 1923, and for every subsequent tax year,

ARTIKEL 2.

Den kongelige danske Regering indgaar paa at tage de fornødne Skridt i Henhold til § 50 i Kongeriget Danmarks Lov Nr. 149 af 10' April 1922, for at fritage for Indkomstskat, at erlægge i Danmark for Skatteaaet 1923-24, der begynder den 1' April 1923, og for hvert følgende Skatteaar, ethvert Udbytte, som

any 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.

hidrører fra Rederivirksomhed, der udøves af en i Storbritannien eller Nordirland bosiddende Person eller af et Selskab, der i Storbritannien eller Nordirland leder og kontrollerer saadan Virksomhed.

ARTICLE 3.

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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.

Udtrykket "Rederivirksomhed" betyder Forretningsvirksomhed, der udøves af en Skibsejer, og forsaavidt denne Definition angaar, omfatter Udtrykket "Skibsejer" enhver Befragter.

ARTICLE 4.

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This agreement shall cease to have effect if and so soon as either the relief to be granted under article 1 hereof in respect of income tax in Great Britain and Northern Ireland, or the relief to be granted under article 2 hereof in respect of income tax in Denmark, ceases to have legal operation.

Denne Overenskomst skal ophøre at have Gyldighed, saafremt og saasnart den Fritagelse, der i Henhold til Art. 1 tilstaas med Hensyn til Indkomstskat i Storbritannien og Nordirland, eller den Fritagelse, der i Henhold til Art. 2 tilstaas med Hensyn til Indkomstskat i Danmark, ophører at have Retsgyldighed.

In witness whereof the undersigned, duly authorised to that effect, have signed this agreement and have affixed thereto their seals.

Til Bekræftelse heraf har de undertegnede, dertil behørigt bemyndiget, undertegnet denne Overenskomst og forsynet den med deres Segl.

Done in duplicate at London, the 18th December, 1924.

Udfærdiget i dobbelt Eksempplar i London den 18 December 1924.

(L.S.) AUSTEN CHAMBERLAIN.

(L.S.) P. F. AHLEFELDT-LAURVIG.