



Treaty Series No. 23 (1929)

AGREEMENT

BETWEEN HIS MAJESTY'S GOVERNMENT
IN THE UNITED KINGDOM
AND THE GREEK GOVERNMENT

for the

Reciprocal Exemption of Shipping Profits from Income Tax, &c.

Athens, July 31, 1929

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

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Agreement between His Majesty's Government in the United Kingdom and the Greek Government for the Reciprocal Exemption of Shipping Profits from Income Tax, &c.

Athens, July 31, 1929.

THE Government of the United Kingdom of Great Britain and Northern Ireland and the Government of the Hellenic Republic being desirous of ensuring the reciprocal exemption from income tax and trading tax in certain cases of profits accruing from the business of shipping, the following agreement has been concluded :—

Ἡ Κυβέρνησις τῆς Ἑλληνικῆς Δημοκρατίας καὶ ἡ Κυβέρνησις τοῦ Ἠνωμένου βασιλείου τῆς Μεγάλης Βρετανίας καὶ τῆς Βορείου Ἰρλανδίας ἐπιθυμοῦσαι νὰ ἐξασφαλίσωσι τὴν ἀμοιβαίαν ἀπαλλαγὴν ἀπὸ τοῦ φόρου εἰσοδήματος καὶ τοῦ φόρου ἐπιτηδεύματος εἰς ὠρισμένας περιπτώσεις κερδῶν προερχομένων ἐκ ναυτιλιακῶν ἐπιχειρήσεων, συνεφώνησαν τὰ ἑξῆς :

ARTICLE 1.

The Government of the United Kingdom of Great Britain and Northern Ireland 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 supertax) chargeable in Great Britain and Northern Ireland for the year of assessment 1923-1924 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 with ships whose port of registry is in the territory of the Hellenic Republic by an in-

*** Ἄρθρον 1.**

Ἡ Κυβέρνησις τοῦ Ἠνωμένου Βασιλείου τῆς Μεγάλης Βρετανίας καὶ τῆς Βορείου Ἰρλανδίας συμφωνεῖ νὰ ἐνεργήσῃ τὰ δέοντα κατὰ τὰς διατάξεις τοῦ Τμήματος 18 τοῦ Νόμου τοῦ Κοινοβουλίου τοῦ Ἠνωμένου Βασιλείου τοῦ καλουμένου Οἰκονομικοῦ Νόμου, 1923, πρὸς ἀπαλλαγὴν ἐκ τοῦ φόρου εἰσοδήματος (συμπεριλαμβανομένου καὶ τοῦ προσθέτου τοιούτου) τοῦ εἰσπραττομένου ἐν Μεγάλῃ Βρετανίᾳ καὶ Βορείῳ Ἰρλανδίᾳ διὰ τὸ φορολογικὸν ἔτος 1923-24 τὸ ἀρχόμενον τὴν 6ην Ἀπριλίου 1923, καὶ διὰ πᾶν ἐπόμενον φορολογικὸν ἔτος, παντὸς κέρδους πραγματοποιομένου ἐκ ναυτιλιακῆς ἐπι-

dividual resident in the territory of the Republic and not resident in Great Britain or Northern Ireland, or by a company managing and controlling such business in the territory of the Republic.

χειρήσεως ενεργουμένης διὰ πλοίων υηολογημένων ἐν λιμένι τῆς Ἑλληνικῆς Δημοκρατίας, εἴτε παρ' ἰδιώτου διαμέοντος ἐν τῇ ἐπικρατείᾳ τῆς Δημοκρατίας καὶ οὐχὶ ἐν Μεγάλῃ Βρεττανίᾳ ἢ Βορείῳ Ἴρλανδίᾳ, εἴτε παρ' ἐταιρείας ἣτις διευθύνει καὶ ἐνασκεῖ τὸν ἔλεγχον τῆς ἐπιχειρήσεως ἐκ τοῦ ἐδάφους τῆς Δημοκρατίας.

ARTICLE 2.

The Government of the Hellenic Republic declares that on completion of the action prescribed by Section 18 of the Finance Act, 1923, which under Article 1 of this Agreement the Government of the United Kingdom have agreed to take, the law in force in the Republic will operate to exempt from all income tax and trading tax chargeable in the Republic as from the 6th day of April, 1923, and thereafter any profits which accrue from the business of shipping carried on with ships whose port of registry is in Great Britain or Northern Ireland by an individual resident in Great Britain or Northern Ireland and not resident in the territory of the Republic or by a company managing and controlling such business in Great Britain or Northern Ireland.

Ἄρθρον 2.

Ἡ Κυβέρνησις τῆς Ἑλληνικῆς Δημοκρατίας δηλοῖ ὅτι συμπληρουμένης τῆς ὑπὸ τοῦ Ἑμήματος 18 τοῦ Οἰκονομικοῦ Νόμου, 1923, προβλεπομένης ἐνεργείας, εἰς ἣν κατὰ τὸ ἄρθρον 1 τῆς παρούσης συμφωνίας ἀνέλαβε νὰ προβῇ ἡ Κυβέρνησις τοῦ Ἠνωμένου Βασιλείου, ὃ ἐν ἰσχύει ἐν τῇ Δημοκρατίᾳ νόμος θὰ ἐφαρμοσθῇ ἵνα ἀπαλλάσσονται ἀπὸ παντὸς φόρου εἰσοδήματος καὶ φόρου ἐπιτηδεύματος ἐπιβαλλομένων ἐν τῇ Δημοκρατίᾳ ἀπὸ τῆς 6 Ἀπριλίου 1923 καὶ μετέπειτα πάντα τὰ κέρδη τὰ προερχόμενα ἐκ ναυτιλιακῆς ἐπιχειρήσεως ενεργουμένης διὰ πλοίων υηολογημένων εἰς λιμένας τῆς Μεγάλῃς Βρεττανίας ἢ τῆς Βορείου Ἴρλανδίας εἴτε παρ' ἰδιώτου διαμέοντος ἐν Μεγάλῃ Βρεττανίᾳ ἢ Βορείῳ Ἴρλανδίᾳ καὶ οὐχὶ ἐν τῷ ἐδάφει τῆς Δημοκρατίας, εἴτε παρ' ἐταιρείας ἣτις διευθύνει καὶ ἐνασκεῖ τὸν ἔλεγχον τῆς ἐπιχειρήσεως ἐκ τοῦ ἐδάφους τῆς Μεγάλῃς Βρεττανίας ἢ τῆς Βορείου Ἴρλανδίας.

ARTICLE 3.

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.

A ship shall be treated as having a port of registry in the territory of the Hellenic Republic, or as having a port of registry in Great Britain or Northern Ireland, during any period during which provisional certificates of registration as a Greek ship issued by Greek Consular Officers, or provisional certificates of registration as a British ship issued by British Consular Officers, as the case may be, are in force in respect of the ship; Provided in either case that the ship is immediately on the expiration of the provisional certificates registered as a Greek ship, or as a British ship, as the case may be.

ARTICLE 4.

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 referred to in Article 2 hereof in respect of income tax and trading tax in the Hellenic Republic ceases to have legal operation.

"Άρθρον 3.

Διὰ τῆς ἐκφράσεως "ναυτιλιακὴ ἐπιχείρησις" νοοῦνται αἱ ἐργασίαι αἱ ἐπιχειρούμεναι ὑπὸ πλοιοκτῆτου, ἐν τῷ καθορισμῷ δὲ τούτῳ ἡ ἐκφρασις "πλοιοκτῆτης" περιλαμβάνει οἰονδήποτε ναυλωτὴν.

Πλοῖόν τι θὰ θεωρεῖται ὡς ἔχον λιμένα νηολογήσεως ἐν τῷ ἐδάφει τῆς Ἑλληνικῆς Δημοκρατίας, ἢ ὡς ἔχον λιμένα νηολογήσεως ἐν Μεγάλῃ Βρετανίᾳ ἢ Βορείῳ Ἰρλανδίᾳ, καθ' ὅλην τὴν διάρκειαν καθ' ἣν προσωρινὰ πιστοποιητικὰ νηολογήσεως ἐκδιδόμενα ὑπὸ Ἑλλήνων Προξενικῶν Ὑπαλλήλων ὑπὲρ ἑλληνικοῦ πλοίου, ἢ προσωρινὰ πιστοποιητικὰ νηολογήσεως ἐκδιδόμενα ὑπὸ Βρεττανίων Προξενικῶν Ὑπαλλήλων ὑπὲρ βρεττανικοῦ πλοίου, κατὰ τὴν περίστασιν, θὰ ἰσχύουσι ὡς πρὸς τὸ πλοῖον τοῦτο· ἐφ' ὅσον ἐν ἑκατέρᾳ περιπτώσει, τὸ πλοῖον τοῦτο εὐθὺς ἅμα τῇ λήξει τοῦ προσωρινοῦ πιστοποιητικοῦ ἤθελε νηολογηθῆ· εἴτε ὡς ἑλληνικὸν εἴτε ὡς βρεττανικὸν πλοῖον ἀναλόγως τῆς περιπτώσεως.

"Άρθρον 4.

Ἡ παρούσα συμφωνία θὰ πάσῃ ἰσχύουσα ἐὰν καὶ εὐθὺς ὡς ἤθελον πάσῃ ἔχουσαι νόμιμον ἐνέργειαν εἴτε ἡ μέλλουσα νὰ παραχωρηθῆ ἀπαλλαγὴ συμφῶνως πρὸς τὸ ἄρθρον 1 ἐν σχέσει πρὸς τὸν φόρον εἰσοδήματος ἐν Μεγάλῃ Βρετανίᾳ καὶ Βορείῳ Ἰρλανδίᾳ, εἴτε ἡ μνημονευομένη ἐν ἄρθρῳ 2 τῆς παρούσης ἀπαλλαγὴ ἐν σχέσει πρὸς τὸν φόρον εἰσοδήματος καὶ τὸν φόρον ἐπιτηδείου ἐν τῇ Ἑλληνικῇ Δημοκρατίᾳ.

In witness whereof the undersigned have signed the present Agreement and have affixed thereto their seals.

Εἰς πίστωσιν τῶν ἀνωτέρω οἱ ὑποσημειούμενοι ὑπέγραψαν τὴν παρούσαν συμφωνίαν καὶ ἔθεσαν τὰς ἰαυτῶν σφραγίδας.

Done in duplicate at Athens in the English and Greek languages this 31st day of July, 1929.

Ἐγένετο εἰς διπλοῦν ἐν Ἀθήναις εἰς Ἑλληνικὴν καὶ Ἀγγλικὴν γλῶσσαν τῇ 31 Ἰουλίου 1929.

(LS.) OLIVER HARVEY.

(LS.) ANDRÉ MICHALACOPOULOS.

