No. 6571

DENMARK
and
CZECHOSLOVAKIA

Exchange of notes constituting an agreement concerning mutual exemption from taxes on profits and income derived from air navigation. Prague, 25 October 1962

Official text: French.

Registered by Denmark on 20 March 1963.

DANEMARK
et
TCHÉCOSLOVAQUIE

Échange de notes constituant un accord relatif à l'exonération réciproque des impôts sur les bénéfices et revenus provenant de la navigation aérienne. Prague, 25 octobre 1962

Texte officiel français.

Enregistré par le Danemark le 20 mars 1963.

[TRANSLATION — TRADUCTION]

No. 6571. EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT[1] BETWEEN DENMARK AND CZECHOSLOVAKIA CONCERNING MUTUAL EXEMPTION FROM TAXES ON PROFITS AND INCOME DERIVED FROM AIR NAVIGATION. PRAGUE, 25 OCTOBER 1962.

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THE ROYAL DANISH LEGATION
PRAGUE

NOTE VERBALE

The Royal Danish Legation presents its compliments to the Ministry of Foreign Affairs and has the honour to inform it as follows :

1. The Danish Government declares, in virtue of the powers conferred upon it by Article I of Act No. 74 of 31 March 1953 and subject to reciprocity, that Czechoslovak air navigation enterprises are exempted in Denmark from State and communal income tax on profits or income derived from international air navigation, and from State capital tax.

2. The exemption declared in paragraph 1 shall also apply to Czechoslovak air navigation enterprises participating in a pool, a joint operating arrangement, or an international operating organization.

3. The expression "air navigation" means transport by air of persons or goods for gain by the owner, hirer or charterer of an aircraft.

4. The expression "Czechoslovak enterprise" means any air navigation enterprise having its actual management in Czechoslovakia and operated by individuals of Czechoslovak nationality resident in Czechoslovakia and not domiciled in Denmark ; or by a body corporate, even if the Czechoslovak State has an interest therein, constituted in accordance with Czechoslovak law ; or by the Czechoslovak State.

5. The exemption declared in paragraphs 1 and 2 shall also apply to Danish taxes levied for the period preceding the date of this declaration.

[1] Came into force on 25 October 1962 by the exchange of the said notes.