No. 6755

NORWAY
and
SWEDEN

Agreement concerning the basis for the division of the revenues of the Luossavaara-Kiirunavaara joint-stock company for the purposes of taxation. Signed at Oslo, on 31 October 1962

Official texts: Norwegian and Swedish.

Registered by Norway on 4 June 1963.

NORVÈGE
et
SUÈDE

Accord relatif aux principes de la répartition du revenu de la Société anonyme Luossavaara-Kiirunavaara aux fins de l'imposition. Signé à Oslo, le 31 octobre 1962

Textes officiels norvégien et suédois.

Enregistré par la Norvège le 4 juin 1963.

[TRANSLATION — TRADUCTION]

No. 6755. AGREEMENT[1] BETWEEN NORWAY AND SWEDEN CONCERNING THE BASIS FOR THE DIVISION OF THE REVENUES OF THE LUOSSAVAARA-KIIRUNAVAARA JOINT-STOCK COMPANY FOR THE PURPOSES OF TAXATION. SIGNED AT OSLO, ON 31 OCTOBER 1962

His Majesty the King of Norway and His Majesty the King of Sweden have agreed that the right to tax the income of the Luossavaara-Kiirunavaara joint-stock company shall be shared between the two countries in accordance with the provisions hereunder.

Article 1

Both State and communal income tax shall be taxed in accordance with the following rules :

Where, during the tax year, not less than 74 per cent and not more than 78 per cent of the total quantities of ore and other mining products consigned to ports by rail from the company's mines is transported to Norwegian ports, one tenth of the company's total income shall be taxable in Norway.

Where the proportion of such consignments transported to Norwegian ports exceeds 78 per cent, the portion of the income which shall be taxable in Norway shall be increased by one hundredth part for each complete hundredth part of the said 78 per cent by which the proportion transported via Norway exceeds this percentage.

Where the proportion of such consignments transported to Norwegian ports is less than 74 per cent, the portion of the income which shall be taxable in Norway shall be decreased by one hundredth part for each complete hundredth part of the said 74 per cent by which the proportion transported via Norway falls short of this percentage. The portion of the income which shall be taxable in Norway shall not, however, be less than 8 per cent.

The portion of the company's total income which, under the above rules, is not taxable in Norway shall be taxable in Sweden.

[1] Came into force on 28 December 1962, the date of the exchange of the instruments of ratification at Stockholm, in accordance with article 4.