No. 8415

NORWAY
and
YUGOSLAVIA

Exchange of notes constituting an agreement concerning the avoidance of double taxation of enterprises engaged in air and maritime navigation. Belgrade, 18 May and 18 June 1966

Official text : English.

Registered by Norway on 30 November 1966.

NORVÈGE
et
YOUGOSLAVIE

Échange de notes constituant une convention tendant à éviter la double imposition des entreprises de navigation aérienne et maritime. Belgrade, 18 mai et 18 juin 1966

Texte officiel anglais.

Enregistré par la Norvège le 30 novembre 1966.

No. 8415. EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT[1] BETWEEN NORWAY AND THE SOCIALIST FEDERAL REPUBLIC OF YUGOSLAVIA CONCERNING THE AVOIDANCE OF DOUBLE TAXATION OF ENTERPRISES ENGAGED IN AIR AND MARITIME NAVIGATION. BELGRADE, 18 MAY AND 18 JUNE 1966

I

No. 415941

The Secretariat of State for Foreign Affairs of the Socialist Federal Republic of Yugoslavia presents its compliments to the Norwegian Embassy and, with reference to the Embassy's Note of 21 July 1965, has the honour, acting upon the instructions of its Government, to propose to the Government of Norway the following :

1. The Government of the Socialist Federal Republic of Yugoslavia, in exercising the authorization conferred to it under Article 73 of the Basic Law on Taxes, declares, under reservation of reciprocity, that the Norwegian enterprises engaged in air and maritime traffic are exempt in Yugoslavia of all income taxes and taxes on benefits deriving from their engaging in air and maritime navigation ; this exemption covers also taxes on movable property, including vessels and aircraft used by such enterprises.

2. The Royal Government of Norway exercising the authorization conferred to it by Section 15 of the Norwegian Taxation Act for the Rural Districts of 18th August, 1911, and Section 10 of the Norwegian Taxation Act for the Urban Districts of the same date, as amended, declares, under reservation of reciprocity, that the Yugoslav enterprises engaging in air and maritime traffic are exempt in Norway of all income taxes and taxes on benefits deriving from their engaging in air and maritime navigation ; this exemption covers also taxes on movable property, including vessels and aircraft used by such enterprises.

3. The exemption under paragraphs 1 and 2 can also be applied to Yugoslav and Norwegian civil aviation enterprises participating in a "pool", joint venture or in an international agency engaged in traffic.

4. The term "engaging in maritime or air traffic" relates to the professional transportation of persons or goods by the owner, charterer or lease-holder of vessels or aircraft.

5. The term "Yugoslav enterprises" relates to enterprises engaging in air or maritime navigation whose head offices are located in Yugoslavia and which are run by societies of persons or capital founded in conformity with the Yugoslav legislation, having their

[1] Came into force on 20 June 1966, the date of delivery of the reply note.