No. 9663

UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND
and
SPAIN

Exchange of notes constituting an agreement for the avoidance of double taxation on profits derived from air transport. Madrid, 21 December 1968

Authentic texts: English and Spanish.

Registered by the United Kingdom of Great Britain and Northern Ireland on 24 June 1969.

ROYAUME-UNI DE GRANDE-BRETAGNE ET D'IRLANDE DU NORD
et
ESPAGNE

Échange de notes constituant un accord tendant à éviter la double imposition des bénéfices provenant de l'exploitation de transports aériens. Madrid, 21 décembre 1968

Textes authentiques: anglais et espagnol.

Enregistré par le Royaume-Uni de Grande-Bretagne et d'Irlande du Nord le 24 juin 1969.

EXCHANGE OF NOTES CONSTITUTING AN AGREEMENT[1] BETWEEN THE GOVERNMENT OF THE UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND AND THE GOVERNMENT OF SPAIN FOR THE AVOIDANCE OF DOUBLE TAXATION ON PROFITS DERIVED FROM AIR TRANSPORT

I

Her Majesty's Ambassador at Madrid to the Minister for Foreign Affairs of Spain

BRITISH EMBASSY
MADRID

21 December, 1968

Your Excellency,

I have the honour to inform Your Excellency that, in order to avoid double taxation of profits derived from air transport, the Government of the United Kingdom of Great Britain and Northern Ireland propose an agreement in the following terms :

(1) The Government of Spain shall exempt United Kingdom undertakings devoted to the business of air transport from the corporation tax, and shall exempt members of the Boards of Administration of the said undertakings from the taxes on the earnings of personal work, and the dividends and interest which according to Spanish law are considered to be earned in Spain, from the taxes on income from capital.

(2) The Government of the United Kingdom shall exempt from income tax, corporation tax, and capital gains tax all profits derived by Spanish undertakings from the business of air transport.

(3) The expression " the business of air transport " means the business of transporting persons, goods or mail carried on by the owner, hirer or charterer of aircraft.

(4) The expression " United Kingdom undertakings " means the Government of the United Kingdom, and corporations and partnerships constituted under the laws in force in the United Kingdom and managed and controlled in the United Kingdom.

(5) The expression " Spanish undertakings " means the Government of Spain, and corporations and partnerships constituted under the laws in force in Spain and managed and controlled in Spain.

[1] Came into force on 21 December 1968, in accordance with the provisions of the said notes.