SCHEDULE

The Arrangement made in 1947 between His Majesty's Government in the United Kingdom of Great Britain and Northern Ireland and the Government of Palestine for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income shall be regarded as continuing in force between His Majesty's Government and the Government of Israel except that instead of to Palestine the Arrangement shall be deemed to extend to the territory in which the Government of Israel levy taxation, so that where in the terms of the Arrangement there is a reference to Palestine the territory in which the Government of Israel levy taxation shall be substituted and where there is a reference to the Government of Palestine the Government of Israel shall be substituted, provided that for the purposes of paragraphs 8 and 10 of the Arrangement services rendered to the Government of Israel shall be deemed to include services rendered to the Government of Palestine. It will be understood that the taxation authorities of the two Governments will consult together as to the manner in which paragraph 14 of the Arrangement shall be applied.

EXPLANATORY NOTE

(This Note is not part of the Order, but is intended to indicate its general purport.)

The Finance (No. 2) Act, 1945, provides for double taxation arrangements with other countries to be given statutory effect by Order in Council. Any such Order is required to be laid before the House of Commons in draft.

Under the agreement with the Government of Israel which is scheduled to this Order, the Arrangement scheduled to the Double Taxation Relief (Taxes on Income) (Palestine) Order, 1947, continues in force, with the necessary adaptations, in relation to the territory in which the Government of Israel levy taxation.

The Double Taxation Relief (Taxes on Income) (Netherlands) Order, 1950

1950 No. 1196

Made - - - - 21*st July*, 1950

At the Court at Buckingham Palace, the 21st day of July, 1950.

Present,

The King's Most Excellent Majesty in Council.

Whereas it is provided by subsection (1) of section fifty-one of the Finance (No. 2) Act, 1945(a), that if His Majesty by Order in Council declares that arrangements specified in the Order have been made with the Government of any territory outside the United Kingdom with a view to affording relief from double taxation in relation to income tax or profits tax and any taxes of a similar character imposed by the laws of that territory, and that it is expedient that those arrangements should have effect, the arrangements shall have effect to the extent specified in that subsection:

(a) 9 & 10 Geo. 6. c. 13.

And Whereas under certain other provisions of Part V of the said Act certain other consequences ensue on the making of any such Order:

And Whereas a draft of this Order was laid before the Commons House of Parliament in accordance with the provisions of subsection (2) of section fifty-six of the said Act and an Address has been presented to His Majesty by that House praying that an Order may be made in the terms of this Order:

Now, therefore, His Majesty, in exercise of the powers conferred on Him by subsection (1) of the said section fifty-one and of all other powers enabling Him in that behalf, is pleased, by and with the advice of His Privy Council, to order, and it is hereby ordered, as follows:—

1. This Order may be cited as the Double Taxation Relief (Taxes on Income) (Netherlands) Order, 1950.

2. It is hereby declared—

(*a*) that the arrangements specified in the Convention set out in the Schedule to this Order have been made with Her Majesty the Queen of the Netherlands with a view to affording relief from double taxation in relation to income tax or profits tax and taxes of a similar character imposed by the laws of the Netherlands; and

(*b*) that it is expedient that those arrangements should have effect.

E. C. E. Leadbitter.

SCHEDULE

CONVENTION BETWEEN HIS MAJESTY IN RESPECT OF THE UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND AND HER MAJESTY THE QUEEN OF THE NETHERLANDS FOR THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME.

His Majesty the King of Great Britain, Ireland and the British Dominions beyond the Seas and Her Majesty the Queen of the Netherlands,

Desiring to conclude a Convention for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income,

Have appointed for that purpose as their Plenipotentiaries:—

His Majesty the King of Great Britain, Ireland and the British Dominions beyond the Seas:

For the United Kingdom of Great Britain and Northern Ireland:

The Right Honourable Ernest Bevin, M.P., His Principal Secretary of State for Foreign Affairs;

Her Majesty the Queen of the Netherlands:

For the Kingdom of the Netherlands:

His Excellency Jonkheer E. Michiels van Verduynen, Her Ambassador Extraordinary and Plenipotentiary in London;

Who, having exhibited their respective full powers, found in good and due form, have agreed as follows:—

ARTICLE I

(1) The taxes which are the subject of the present Convention are:—

(*a*) In the Netherlands:—

The income tax, the wages tax, the company tax, the dividends tax and the tax on fees of directors and managers of companies (hereinafter referred to as "Netherlands tax");

(*b*) In the United Kingdom of Great Britain and Northern Ireland:—

The income tax (including sur-tax) and the profits tax (hereinafter referred to as "United Kingdom tax").

(2) The present Convention shall also apply to any other taxes of a substantially similar character imposed in the Netherlands or the United Kingdom subsequently to the date of signature of the present Convention.

ARTICLE II

(1) In the present Convention, unless the context otherwise requires:—

(*a*) The term "United Kingdom" means Great Britain and Northern Ireland, excluding the Channel Islands and the Isle of Man;

(*b*) The term "Netherlands" means the Kingdom of the Netherlands in Europe;

(*c*) The terms "one of the territories" and "the other territory" mean the United Kingdom or the Netherlands, as the context requires;

(*d*) The term "tax" means United Kingdom tax or Netherlands tax as the context requires;

(*e*) The term "person" includes any body of persons, corporate or not corporate;

(*f*) The term "company" means any body corporate, and any partnership the capital of which is wholly or partly represented by shares;

(*g*) The terms "resident of the United Kingdom" and "resident of the Netherlands" mean respectively any person who is resident in the United Kingdom for the purposes of United Kingdom tax and not resident in the Netherlands for the purposes of Netherlands tax, and any person who is resident in the Netherlands for the purposes of Netherlands tax and not resident in the United Kingdom for the purposes of United Kingdom tax; a company shall be regarded as resident in the United Kingdom if its business is managed and controlled in the United Kingdom and as resident in the Netherlands if its business is managed and controlled in the Netherlands;

(*h*) The terms "resident of one of the territories" and "resident of the other territory" mean a person who is a resident of the United Kingdom or a person who is a resident of the Netherlands, as the context requires;

(*i*) The terms "United Kingdom enterprise" and "Netherlands enterprise" mean respectively an industrial or commercial enterprise carried on by a resident of the United Kingdom and an industrial or commercial enterprise carried on by a resident of the Netherlands, and the terms "enterprise of one of the territories" and "enterprise of the other territory" mean a United Kingdom enterprise or a Netherlands enterprise, as the context requires;

(*j*) The term "industrial or commercial profits" includes rents or royalties in respect of cinematograph films;

(*k*) The term "permanent establishment," when used with respect to an enterprise of one of the territories, means a branch, management, factory, or other fixed place of business, but does not include an agency unless the agent has, and habitually exercises, a general authority to negotiate and conclude contracts on behalf of such enterprise or has a stock of merchandise from which he regularly fills orders on its behalf. In this connexion:—

(i) An enterprise of one of the territories shall not be deemed to have a permanent establishment in the other territory merely because it carries on business dealings in that other territory through a *bona fide* broker or general commission agent acting in the ordinary course of his business as such;

(ii) The fact that an enterprise of one of the territories maintains in the other territory a fixed place of business exclusively for the purchase of goods or mechandise shall not of itself constitute that fixed place of business a permanent establishment of the enterprise;

(iii) The fact that a company which is a resident of one of the territories has a subsidiary company which is a resident of the other territory or which carries on a trade or business in that other territory (whether through a permanent establishment or otherwise) shall not of itself constitute that subsidiary company a permanent establishment of its parent company.

(2) In the application of the provisions of the present Convention by one of the High Contracting Parties any term not otherwise defined shall, unless the context otherwise requires, have the meaning which it has under the laws in force in the territory of that Party relating to the taxes which are the subject of the present Convention.

ARTICLE III

(1) The industrial or commercial profits of a United Kingdom enterprise shall not be subject to Netherlands tax unless the enterprise carries on a trade or business in the Netherlands through a permanent establishment situated therein. If it carries on a trade or business as aforesaid, tax may be imposed on those profits by the Netherlands, but only on so much of them as is attributable to that permanent establishment.

(2) The industrial or commercial profits of a Netherlands enterprise shall not be subject to United Kingdom tax unless the enterprise carries on a trade or business in the United Kingdom through a permanent establishment situated therein. If it carries on a trade or business as aforesaid, tax may be imposed on those profits by the United Kingdom, but only on so much of them as is attributable to that permanent establishment.

(3) Where an enterprise of one of the territories carries on a trade or business in the other territory through a permanent establishment situated therein, there shall be attributed to that permanent establishment the industrial or commercial profits which it might be expected to derive in that other territory if it were an independent enterprise engaged in the same or similar activities under the same or similar conditions and dealing at arm's length with the enterprise of which it is a permanent establishment.

(4) Where an enterprise of one of the territories derives profits, under contracts concluded in that territory, from sales of goods or merchandise stocked in a warehouse in the other territory for convenience of delivery and not for purposes of display, those profits shall not be attributed to a permanent establishment of the enterprise in that other territory, notwithstanding that the offers of purchase have been obtained by an agent in that other territory and transmitted by him to the enterprise for acceptance.

(5) No portion of any profits arising to an enterprise of one of the territories shall be attributed to a permanent establishment situated in the other territory by reason of the mere purchase of goods or merchandise within that other territory by the enterprise.

ARTICLE IV

Where

(*a*) an enterprise of one of the territories participates directly or indirectly in the management, control or capital of an enterprise of the other territory, or

(*b*) the same persons participate directly or indirectly in the management, control or capital of an enterprise of one of the territories and an enterprise of the other territory,

and in either case, conditions are made or imposed between the two enterprises in their commercial or financial relations, which differ from those which would be made between independent enterprises, then any profits which would but for those conditions have accrued to one of the enterprises but by reason of those conditions have not so accrued may be included in the profits of that enterprise and taxed accordingly.

ARTICLE V

Notwithstanding the provisions of Articles III and IV, profits which a resident of one of the territories derives from operating ships or aircraft shall be exempt from tax in the other territory.

ARTICLE VI

(1) Dividends paid by a company resident in one of the territories to a resident of the other territory, who is subject to tax in that other territory in respect thereof and does not carry on a trade or business in the first-mentioned territory through a permanent establishment situated therein, shall be exempt from any tax in that first-mentioned territory which is chargeable on dividends in addition to the tax chargeable in respect of the profits or income of the company.

(2) Where a company which is a resident of one of the territories derives profits or income from sources within the other territory, there shall not be imposed in that other territory any form of taxation on dividends paid by the company to persons not resident in that other territory, or any tax in the nature of an undistributed profits tax on undistributed profits of the company, whether or not those dividends or undistributed profits represent, in whole or in part profits or income so derived.

ARTICLE VII

(1) Any interest or royalty derived from sources within one of the territories by a resident of the other territory, who is subject to tax in that other territory in respect thereof and does not carry on a trade or business in the first-mentioned territory through a permanent establishment situated therein, shall be exempt from tax in that first-mentioned territory.

(2) In this Article:—

(*a*) The term "interest" includes interest on a debenture or on any other form of indebtedness, except in so far as such other indebtedness is secured by way of mortgage of immovable property;

(*b*) The term "royalty" means any royalty or other amount paid as consideration for the use of, or for the privilege of using, any copyright, patent, design, secret process or formula, trade-mark or other like property, but does not include any royalty or other amount paid in respect of the operation of a mine or quarry or of any other extraction of natural resources.

(3) Where any interest or royalty exceeds a fair and reasonable consideration in respect of the indebtedness or rights for which it is paid, the exemption provided by the present Article shall apply only to so much of the interest or royalty as represents such fair and reasonable consideration.

(4) Any capital sum derived from sources within one of the territories from the sale of patent rights by a resident of the other territory, who does not carry on a trade or business in the first-mentioned territory through a permanent establishment situated therein, shall be exempt from tax in that first-mentioned territory.

ARTICLE VIII

Income from immovable property interest (other than debenture interest) from any mortgage of such property, and royalties in respect of the operation of a mine or quarry or of any other extraction of a natural resource, shall be subject to tax in accordance with the law in force in the territory in which such immovable property, mine, quarry or natural resource is situated.

ARTICLE IX

(1) Remuneration, including pensions, paid by, or out of funds created by, one of the High Contracting Parties to any individual in respect of services rendered to that Party in the discharge of governmental functions shall be exempt from tax in the territory of the other High Contracting Party, unless the individual is a national of that other Party without being also a national of the first-mentioned Party.

(2) The provisions of this Article shall not apply to payments in respect of services rendered in connexion with any trade or business carried on by either of the High Contracting Parties for purposes of profit.

ARTICLE X

(1) An individual who is a resident of the United Kingdom shall be exempt from Netherlands tax on profits or remuneration in respect of personal (including professional) services performed within the Netherlands in any year of assessment, if

(*a*) he is present within the Netherlands for a period or periods not exceeding in the aggregate 183 days during that year, and

(*b*) the services are performed for or on behalf of a resident of the United Kingdom, and

(*c*) the profits or remuneration are subject to United Kingdom tax.

(2) An individual who is a resident ot the Netherlands shall be exempt from United Kingdom tax on profits or remuneration in respect of personal (including professional) services performed within the United Kingdom in any year of assessment, if

(*a*) he is present within the United Kingdom for a period or periods not exceeding in the aggregate 183 days during that year, and

(*b*) the services are performed for or on behalf of a resident of the Netherlands, and

(*c*) the profits or remuneration are subject to Netherlands tax.

(3) The provisions of this Article shall not apply to the profits or remuneration of public entertainers such as theatre, motion picture or radio artists, musicians and athletes.

ARTICLE XI

(1) Any pension (other than a pension of the kind referred to in paragraph (1) of Article IX) and any annuity, derived from sources within the Netherlands by an individual who is a resident of the United Kingdom and subject to United Kingdom tax in respect thereof, shall be exempt from Netherlands tax.

(2) Any pension (other than a pension of the kind referred to in paragraph (1) of Article IX) and any annuity, derived from sources within the United Kingdom by an individual who is a resident of the Netherlands and subject to Netherlands tax in respect thereof, shall be exempt from United Kingdom tax.

(3) The term "annuity" means a stated sum payable periodically at stated times, during life or during a specified or ascertainable period of time, under an obligation to make the payments in return for adequate and full consideration in money or money's worth.

ARTICLE XII

A professor or teacher from one of the territories, who receives remuneration for teaching, during a period of temporary residence not exceeding two years, at a university, college, school or other educational institution in the other territory, shall be exempt from tax in that other territory in respect of that remuneration.

ARTICLE XIII

A student, student-trainee or business apprentice from one of the territories who is receiving full-time education or training in the other territory shall be exempt from tax in that other territory on payments made to him by persons in the first-mentioned territory for the purposes of his maintenance, education or training.

ARTICLE XIV

(1) Individuals who are residents of the Netherlands shall be entitled to the same personal allowances, reliefs and reductions for the purposes of United Kingdom income tax as British subjects not resident in the United Kingdom.

(2) Individuals who are residents of the United Kingdom shall be entitled to the same personal allowances and reliefs for the purposes of Netherlands tax as Netherlands nationals not resident in the Netherlands.

ARTICLE XV

(1) Subject to the provisions of the law of the United Kingdom regarding the allowance as a credit against United Kingdom tax of tax payable in a territory outside the United Kingdom, Netherlands tax payable, whether directly or by deduction, in respect of income from sources within the Netherlands shall be allowed as a credit against any United Kingdom tax payable in respect of that income. Where such income is a dividend paid by a company resident in the Netherlands to a company resident in the United Kingdom which controls, directly or indirectly, not less than one-half of the voting power in the former company, the credit shall take into account, in addition to any Netherlands tax payable in respect of the dividend, the Netherlands tax payable by the former company in respect of its profits.

(2) As far as may be in accordance with the provisions of Netherlands law, United Kingdom tax payable, whether directly or by deduction, in respect of income from sources within the United Kingdom shall be allowed as a credit against any Netherlands tax payable in respect of that income. Provided that for the purposes of this paragraph and of the aforesaid provision of Netherlands law, the Netherlands tax payable in respect of such income (before allowance of any credit) shall be deemed to be an amount which bears the same proportion to the total Netherlands tax payable (before allowance of any credit) by the person entitled to such income as such income bears to that person's total income subject to Netherlands tax, and the credit shall not exceed the amount so determined.

(3) For the purposes of this Article, profits or remuneration for personal (including professional) services performed in one of the territories shall be deemed to be income from sources within that territory, and the services of an individual whose services are wholly or mainly performed in ships or aircraft operated by a resident of one of the territories shall be deemed to be performed in that territory.

ARTICLE XVI

(1) The taxation authorities of the High Contracting Parties shall exchange such information (being information which is at their disposal under their respective taxation laws in the normal course of administration) as is necessary for carrying out the provisions of the present Convention or for the prevention of fraud or for the administration of statutory provisions against legal avoidance in relation to the taxes which are the subject of the present Convention. Any information so exchanged shall be treated as secret and shall not be disclosed to any persons other than those concerned with the assessment and collection of the taxes which are the subject of the present Convention. No information as aforesaid shall be exchanged which would disclose any trade, business, industrial or professional secret or trade process.

(2) As used in this Article, the term "taxation authorities" means, in the case of the United Kingdom, the Commissioners of Inland Revenue or their authorised representative; in the case of the Netherlands, the "Directeur-Generaal der Belastingen" or his authorised representative; and, in the case of any territory to which the present Convention is extended under Article XIX, the competent authority for the administration in such territory of the taxes to which the present Convention applies.

ARTICLE XVII

The following agreements between the United Kingdom and the Kingdom of the Netherlands shall not have effect for any year or period for which the present Convention has effect, that is to say,

(*a*) the agreement dated 20th May, 1926(**a**), for the reciprocal exemption from income tax in certain cases of profits accruing from the business of shipping;

(*b*) the convention date 6th June, 1935(**b**), for reciprocal exemption from taxes in certain cases; and

(*c*) the agreement constituted by exchange of notes dated 27th August, 1936(**c**), for reciprocal exemptions from certain taxation in respect of the business of air transport.

ARTICLE XVIII

(1) The nationals of one of the High Contracting Parties shall not be subjected in the territory of the other High Contracting Party to any taxation or any requirement connected therewith which is other, higher or more burdensome than the taxation and connected requirements to which the nationals of the latter Party are or may be subjected.

(**a**) S.R. & O. 1926 (No. 824) p. 643.
(**b**) S.R. & O. 1936 (No. 1134) I, p. 1105.
(**c**) S.R. & O. 1936 (No. 1331) I, p. 1111.

(2) The enterprises of one of the territories shall not be subjected in the other territory, in respect of profits attributable to their permanent establishments in that other territory, to any taxation which is other, higher or more burdensome than the taxation to which the enterprises of that other territory are or may be subjected in respect of the like profits.

(3) Nothing in paragraph (1) or paragraph (2) of this Article shall be construed as obliging one of the High Contracting Parties to grant to nationals of the other High Contracting Party who are not resident in the territory of the former Party the same personal allowances, reliefs and reductions for tax purposes as are granted to His own nationals.

(4) In this Article the term " nationals " means:—

(*a*) in relation to the Netherlands:

(i) all Netherlands nationals;

(ii) all Netherlands subjects residing in the Netherlands;

(iii) as regards any Netherlands territory to which the present Convention applies by reason of extension made under Article XIX, all Netherlands subjects who reside in such territory or who derive their status as Netherlands subjects from birth in, or origin from, such territory;

(iv) all legal persons, partnerships and associations deriving their status as such from the law in force in any Netherlands territory to which the present Convention applies;

(*b*) in relation to the United Kingdom, all British subjects and British protected persons residing in or belonging to the United Kingdom or any British territory to which the present Convention applies by reason of extension made under Article XIX, and all legal persons, partnerships and associations deriving their status as such from the law in force in any British territory to which the present Convention applies.

(5) In this Article the term " taxation " means taxes of every kind and description levied on behalf of any authority whatsoever.

ARTICLE XIX

(1) The present Convention may be extended, either in its entirety or with modifications, to any territory of one of the High Contracting Parties to which this Article applies and which imposes taxes substantially similar in character to those which are the subject of the present Convention, and any such extension shall take effect from such date and subject to such modifications and conditions (including conditions as to termination) as may be specified and agreed between the High Contracting Parties in notes to be exchanged for this purpose.

(2) The termination in respect of the Netherlands or the United Kingdom of the present Convention under Article XXI shall, unless otherwise expressly agreed by both High Contracting Parties, terminate the application of the present Convention to any territory to which the Convention has been extended under this Article.

(3) The territories to which this Article applies are:—

(*a*) in relation to His Majesty the King of Great Britain, Ireland and the British Dominions beyond the Seas:

Any territory other than the United Kingdom for whose foreign relations the United Kingdom is responsible:

(*b*) in relation to Her Majesty the Queen of the Netherlands:

Any territory other than the Netherlands for whose foreign relations the Netherlands is responsible;

ARTICLE XX

(1) The present Convention shall be ratified and the instruments of ratification shall be exchanged at London as soon as possible.

(2) Upon exchange of ratifications the present Convention shall have effect:—

(*a*) In the United Kingdom:

as respects income tax for any year of assessment beginning on or after the 6th April, 1948;

as respects sur-tax for any year of assessment beginning on or after the 6th April, 1947; and

as respects profits tax (not being profits tax apportionable to so much of any chargeable accounting period as falls before the 1st January, 1947), in respect of the following profits—

(i) profits arising in any chargeable accounting period beginning on or after the 1st April, 1948;

(ii) profits attributable to so much of any chargeable accounting period falling partly before and partly after that date as falls after that date;

(iii) profits not so arising or attributable by reference to which income tax is, or but for the present Agreement would be, chargeable for any year of assessment beginning on or after the 6th April, 1948;

(*b*) In the Netherlands:

as respects income tax for any year of assessment beginning after the 31st December, 1947;

as respects the company tax for any chargeable accounting period beginning after the 31st December, 1947; and for the unexpired portion of any chargeable accounting period current at that date; and

as respects any other taxes for the calendar year 1948 and subsequent years.

ARTICLE XXI

The present Convention shall continue in effect indefinitely but either of the High Contracting Parties may, on or before the 30th June in any calendar year not earlier than the year 1952, give to the other High Contracting Party, through diplomatic channels, written notice of termination and, in such event, the present Convention shall cease to be effective:—

(*a*) In the United Kingdom:

as respects income tax for any year of assessment beginning on or after the 6th April in the calendar year next following that in which the notice is given;

as respects sur-tax for any year of assessment beginning on or after the 6th April in the calendar year in which the notice is given; and

as respects profits tax in respect of the following profits—

(i) profits arising in any chargeable accounting period beginning on or after the 1st April in the calendar year next following that in which the notice is given;

(ii) profits attributable to so much of any chargeable accounting period falling partly before and partly after that date as falls after that date;

(iii) profits not so arising or attributable by reference to which income tax is chargeable for any year of assessment beginning on or after the 6th April in that next following calendar year:

(*b*) In the Netherlands:

as respects income tax for any year of assessment beginning after the end of the calendar year in which the notice is given;

as respects the company tax for any chargeable accounting period beginning after the end of the calendar year in which the notice is given, and for the unexpired portion of any chargeable accounting period current at the end of that year; and

as respects any other taxes for any calendar year following that in which the notice is given.

In witness whereof the above-mentioned Plenipotentiaries have signed the present Convention and have affixed thereto their seals.

Done at London in duplicate, in the English and Netherlands languages, both texts being equally authentic, on the 15th day of October, 1948.

[L.S.] ERNEST BEVIN.

[L.S.] E. MICHIELS VAN VERDUYNEN.

EXPLANATORY NOTE

(This Note is not part of the Order, but is intended to indicate its general purport.)

Under the Convention with the Netherlands which is scheduled to this Order, certain classes of income derived from one country by a resident of the other country are (subject to certain conditions) exempt from tax in the former country; these classes are shipping and air transport profits, certain trading profits not arising through a "permanent establishment", patent and copyright royalties, interest (other than interest on mortgages on real property), pensions, purchased annuities and earnings of temporary business visitors. Government salaries and pensions are normally taxed by the paying Government only. Remuneration of visiting professors and teachers is exempt in the country visited.

Dividends are to be exempt from any tax which is additional to the tax charged on the profits represented by the dividend.

Where income continues to be taxable in both countries, credit is given by the country of the taxpayer's residence for the tax payable on that income in the country in which it arises.

Provision is included for the exchange of information between the taxation authorities of the two countries.

The Convention takes effect for the fiscal year 1948-49.

The Double Taxation Relief (Taxes on Income) (Netherlands Dividends) Regulations, 1950

1950 No. 1442

Made - - - - 26*th August*, 1950

Coming into Operation 1*st September*, 1950

The Commissioners of Inland Revenue in exercise of the powers conferred upon them by Section 53 of the Finance (No. 2) Act, 1945(**a**), hereby make the following Regulations:—

1. The Regulations may be cited as the Double Taxation Relief (Taxes on Income) (Netherlands Dividends) Regulations, 1950, and shall come into operation on the first day of September, 1950.

(**a**) 9 & 10 Geo. 6. c. 13.