Multilateral Convention (MLI) – Norway Publishes English Synthesized Text of Norway-United Kingdom Treaty

20 November 2023

Report from IBFD Tax Treaties Unit

On 20 November 2023, the Norwegian Ministry of Finance published the English synthesized text of the Norway - United Kingdom Income Tax Treaty (2013), displaying the modifications made to the treaty by the MLI.

Norway and the United Kingdom deposited their instrument of ratification of the MLI on, respectively, 17 July 2019 and 29 June 2018. The MLI therefore entered into force for Norway on 1 November 2019 and for the United Kingdom on 1 October 2018.

Unless stated otherwise in the synthesized text, the provisions of the MLI will have effect with respect to the Norway - United Kingdom Income Tax Treaty (2013):

In Norway and the United Kingdom:

- with respect to taxes withheld at source on amounts paid or credited to non-residents, where the event giving rise to such taxes occurs on or after 1 January 2020; and
- with respect to all other taxes, for taxes levied with respect to taxable periods beginning on or after 1
 May 2020.

Furthermore, paragraph 4 of article 35 of the MLI does not apply.

The purpose of the synthesized text is to facilitate the understanding of the application of the MLI but it is not in itself a source of law.

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