

## DOUBLE TAXATION: SHIPPING PROFITS

*Exchange of notes at Berlin September 5 and October 8, 1923, January 19, May 5, September 3, November 29, and December 11, 1924, and March 20, 1925*

*Entered into force March 20, 1925; operative from January 1, 1921*

*Operation suspended during World War II*

*Not revived with Federal Republic of Germany*

47 Stat. 2627; Executive Agreement Series 17

### EXCHANGE OF NOTES

*The Ministry for Foreign Affairs to the American Embassy*

[TRANSLATION]

FOREIGN OFFICE

No. V Steu 1496

### NOTE VERBALE

Supplementing its Note Verbale No. III A 522 of March 19 last, regarding the exemption of American shipping companies from the corporation tax, the Foreign Office has the honor to inform the Embassy of the United States of America that the Federal Minister of Finance has instructed the financial authorities, in the case of commercial companies whose seat and place of direction is in the United States of America, not to subject to the corporation tax the income which comes exclusively from the operation of ships and not to demand a corporation-tax declaration as to the above-mentioned from the North American companies which maintain in Germany a branch office, any other place of operation, or a permanent representative. This instruction was issued on condition of reciprocity on the part of the United States and under the reservation that it may be recalled at any time.

The said Minister has furthermore declared his readiness to grant the favored treatment accorded to North American shipping companies also to citizens (individual persons) of the United States of America who carry on shipping traffic to Germany, if the Government of the United States of America grants reciprocity in the same degree.

The Foreign Office would be grateful to the Embassy of the United States of America if the latter would report the above to its Government with the greatest possible despatch and obtain a statement as to the attitude of the