

DOUBLE TAXATION: SHIPPING PROFITS

*Exchange of notes at Washington June 6, 1946, and January 7, 1947
Entered into force January 7, 1947; operative from November 19, 1943
Superseded January 1, 1952, by convention of March 3, 1952¹*

61 Stat. 2671; Treaties and Other
International Acts Series 1596

The Finnish Minister to the Secretary of State

LEGATION OF FINLAND
WASHINGTON, D. C.

4962

JUNE 6, 1946

EXCELLENCY,

I have the honor to inform Your Excellency that the Government of Finland is desirous of entering into an agreement with the Government of the United States of America relating to reciprocal exemption from double taxation on shipping profits.

With a view to obtaining from the appropriate authorities of the Government of the United States of America a decision that Finland meets the requirements, with respect to reciprocal exemption, of the applicable United States revenue laws, and consequently that the income of Finnish nationals and corporations which consists exclusively of earnings derived from the operation of ships documented under the laws of Finland are exempted from taxation by the United States, I furnish the following information, under the instructions from my Government, with respect to the provisions of Finnish law under which, on the basis of reciprocity, shipping profits of United States nationals and corporations are accorded exemption from Finnish income tax:

"The Government is empowered to allow exceptions on the basis of reciprocity from the provisions of this law with regard to the obligatory payment of tax on income derived from abroad and on property located there and also as regards the liability to taxation of a foreign individual as well as of a foreign state, corporation, institution and foundation." (Section 6 of "Law Regarding Tax on Income and Property", enacted November 19, 1943, No. 888).

¹ 3 UST 4485; TIAS 2596.