
STATUTORY INSTRUMENTS

1996 No. 2599

INCOME TAX

**The Double Taxation Relief (Taxes
on Income) (Venezuela) Order 1996**

Made - - - - 15th October 1996

**THE DOUBLE TAXATION RELIEF (TAXES
ON INCOME) (VENEZUELA) ORDER 1996**

1. This Order may be cited as the Double Taxation Relief...
2. It is hereby declared — (a) that the arrangements specified...
Signature

SCHEDULE —

PART I — CONVENTION BETWEEN THE GOVERNMENT OF THE
UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN
IRELAND AND THE GOVERNMENT OF THE REPUBLIC
OF VENEZUELA FOR THE AVOIDANCE OF DOUBLE
TAXATION AND THE PREVENTION OF FISCAL EVASION
WITH RESPECT TO TAXES ON INCOME AND CAPITAL
GAINS

The Government of the United Kingdom of Great Britain and...
Desiring to conclude a Convention for the avoidance of double...
Have agreed as follows:

CHAPTER I

SCOPE OF CONVENTION

Article 1

Personal scope

This Convention shall apply to persons who are residents of...

Status: This is the original version (as it was originally made). This item of legislation is currently only available in its original format.

Article 2

Taxes covered

1. The taxes which are the subject of this Convention are:...
2. The Convention shall also apply to any identical or substantially...

CHAPTER II

DEFINITIONS

Article 3

General definitions

1. For the purposes of this Convention, unless the context otherwise...
2. As regards the application of this Convention by a Contracting...

Article 4

Resident

1. For the purposes of this Convention, the term “resident of...”
2. Where by reason of the provisions of paragraph (1) of...
3. Where by reason of the provisions of paragraph (1) of...

Article 5

Permanent establishment

1. For the purposes of this Convention, the term “permanent establishment”...
2. The term “permanent establishment” includes especially: (a) a place of...
3. Notwithstanding the preceding provisions of this Article, the term “permanent...”
4. Notwithstanding the provisions of paragraphs (1) and (2) of this...
5. An enterprise shall not be deemed to have a permanent...
6. The fact that a company which is a resident of...

CHAPTER III

TAXATION OF INCOME

Article 6

Income from immovable property

1. Income derived by a resident of a Contracting State from...
2. The term “immovable property” shall have the meaning which it...
3. The provisions of paragraph (1) of this Article shall apply...
4. The provisions of paragraphs (1) and (3) of this Article...

Article 7

Business profits

- (1) The profits of an enterprise of a Contracting State...

Article 8

Shipping and air transport

- (1) Profits derived by a resident of a Contracting State...

Article 9

Associated enterprises

- (1) Where: (a) an enterprise of a Contracting State participates...

Article 10

Dividends

1. Dividends paid by a company which is a resident of...
2. However, such dividends may also be taxed in the Contracting...
3. Notwithstanding paragraph (2) of this Article, the Contracting State of...
4. The term “dividends” as used in this Article means income...
5. The provisions of paragraphs (1), (2) and (3) of this...
6. Where a company which is a resident of a Contracting...
7. The provisions of this Article shall not apply if it...

Article 11

Interest

1. Interest arising in a Contracting State and paid to a...
2. However, such interest may also be taxed in the Contracting...
3. Notwithstanding the provisions of paragraph (2) of this Article, interest...
4. Notwithstanding the provisions of Article 7 of this Convention and...
5. The term “interest” as used in this Article means income...
6. The provisions of paragraphs (1), (2) and (3) of this...
7. Interest shall be deemed to arise in a Contracting State...
8. Where, by reason of a special relationship between the payer...
9. The provisions of this Article shall not apply if it...
10. For the purposes of this Article the following residents of...

Article 12

Royalties

1. Royalties arising in a Contracting State and paid to a...
2. However, such royalties may also be taxed in the Contracting...
3. The term “royalties” as used in this Article means payments...
4. The provisions of paragraphs (1) and (2) of this Article...
5. Royalties shall be deemed to arise in a Contracting State...
6. Where, by reason of a special relationship between the payer...
7. The provisions of this Article shall not apply if it...
8. For the purposes of this Article the following residents of...

Status: This is the original version (as it was originally made). This item of legislation is currently only available in its original format.

Article 13

Capital gains

(1) Gains derived by a resident of a Contracting State...

Article 14

Independent personal services

1. Income derived by a resident of a Contracting State in...
2. The term “professional services” includes among others independent scientific, literary,...

Article 15

Dependent personal services

1. Subject to the provisions of Article s 16, 18 and...
2. Notwithstanding the provisions of paragraph (1) of this Article, remuneration...
3. Notwithstanding the preceding provisions of this Article, remuneration derived in...

Article 16

Director’s fees

Directors' fees and other similar payments derived by a resident...

Article 17

Artistes and athletes

(1) Notwithstanding the provisions of Article s 14 and 15...

Article 18

Pensions and annuities

1. Pensions and other similar remuneration and any annuity paid in...
2. The term “annuity” means a stated sum payable periodically at...

Article 19

Government service

(1)(a) Remuneration, other than a pension, paid by a Contracting...

Article 20

Students

Payments which a student or business apprentice who is or...

Article 21

Other income

1. Items of income beneficially owned by a resident of a...
2. The provisions of paragraph (1) of this Article shall not...
3. Notwithstanding the provisions of paragraphs (1) and (2) of this...
4. Where, by reason of a special relationship between the resident...
5. The provisions of this Article shall not apply if it...

CHAPTER IV

METHODS FOR THE ELIMINATION OF DOUBLE TAXATION

Article 22

Elimination of double taxation

- (1) Subject to the provisions of the law of the...

Article 23

Non-discrimination

1. Nationals of a Contracting State shall not be subjected in...
2. The taxation on a permanent establishment which an enterprise of...
3. Except where the provisions of paragraph (1) of Article 9,...
4. Enterprises of a Contracting State, the capital of which is...
5. Nothing contained in this Article shall be construed as obliging...
6. The provisions of this Article shall apply to the taxes...

Article 24

Partnerships

Where, under any provision of this Convention, a partnership is...

Article 25

Mutual agreement procedure

1. Where a resident of a Contracting State considers that the...
2. The competent authority shall endeavour, if the objection appears to...
3. The competent authorities of the Contracting States shall endeavour to...
4. The competent authorities of the Contracting States may communicate with...

Article 26

Exchange of information

1. The competent authorities of the Contracting States shall exchange such...
2. In no case shall the provisions of paragraph (1) of...

Status: This is the original version (as it was originally made). This item of legislation is currently only available in its original format.

Article 27

Members of diplomatic or permanent missions and consular posts

Nothing in this Convention shall affect any fiscal privileges accorded...

Article 28

Entry into force

1. Each of the Contracting States shall notify to the other,...
2. The existing Agreement for the Avoidance of Double Taxation in...

Article 29

Termination

This Convention shall remain in force indefinitely until terminated by...

Done in duplicate at Caracas this 11th day of March,...

PART II — EXCHANGE OF NOTES

Your Excellency

I have the honour to refer to the Convention between...

Article 4

Articles 7 and 14

Article 8

If the following proposal is acceptable to the Government of...

I avail myself of this opportunity to extend to Your...

Your Excellency

I am in receipt of your note dated 11th March...

The foregoing proposal being acceptable to the Government of the...

I take this opportunity to renew to Your Excellency the...

Explanatory Note