#### DRAFT STATUTORY INSTRUMENTS

## 1998 No.

# **INCOME TAX**

The Double Taxation Relief (Taxes on Income) (Oman) Order 1998

Made - - - - 1998

# THE DOUBLE TAXATION RELIEF (TAXES ON INCOME) (OMAN) ORDER 1998

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

SCHEDULE —

PART I — AGREEMENT BETWEEN THE GOVERNMENT OF THE UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND AND THE GOVERNMENT OF THE SULTANATE OF OMAN 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 an Agreement for the avoidance of double... Have agreed as follows:

#### ARTICLE 1

## Persons covered

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

#### ARTICLE 2

### Taxes covered

	ARTICLE 3
	General definitions
123	
	ARTICLE 4
100	Residence
123	A DETICAL E. C
	ARTICLE 5
1234567	Permanent establishment
120.007	ARTICLE 6
	Income from immovable property
1234	
	ARTICLE 7
	Business profits
1234567	
	ARTICLE 8
100.45	Shipping and air transport
12345	A DETICAL EL O
	ARTICLE 9
12	Associated enterprises
	ARTICLE 10
	Dividends
123456	
	ARTICLE 11
	Interest
12345	

ARTICLE 12 Royalties 12345 ARTICLE 13 Capital gains 1234567 ARTICLE 14 Independent personal services 12 ARTICLE 15 Dependent personal services 123 ARTICLE 16 Directors' fees Directors' fees and other similar payments derived by a resident... ARTICLE 17 Artistes and sportsmen 123 ARTICLE 18 Pensions 12 ARTICLE 19 Government service 123 ARTICLE 20 Students

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

	ARTICLE 21
	Other income
1234	
	ARTICLE 22
	Elimination of double taxation
123	
	ARTICLE 23
	Limitation of relief
	Notwithstanding the provisions of any other Article of this Agreement,
	ARTICLE 24
	Partnerships
	Where, under any provision of this Agreement, a partnership is
	ARTICLE 25
	Non-discrimination
123456	
	ARTICLE 26
	Mutual agreement procedure
1234	
	ARTICLE 27
	Exchange of information
12	
	ARTICLE 28
	Members of diplomatic or permanent missions and consular posts
12	
	ARTICLE 29
	Entry into force
12	

#### ARTICLE 30

#### **Termination**

This Agreement shall remain in force until terminated by one... In witness whereof the undersigned, duly authorised thereto (by their... Done in duplicate at London the 23rd day of February...

PART II — EXCHANGE OF NOTES

Your Excellency
London 23rd February 1998
I have the honour to refer to the Agreement between...
If the foregoing proposals are acceptable to the Government of...
I avail myself of this opportunity to extend to Your...

Your Excellency
London
23rd February 1998
I have the honour to acknowledge receipt of Your Excellency's...
The foregoing proposals being acceptable to the Government of the...
I take this opportunity to renew to Your Excellency the...

**Explanatory Note**