
STATUTORY INSTRUMENTS

1991 No. 2879

INCOME TAX

**The Double Taxation Relief (Taxes
on Income) (Iceland) Order 1991**

Made - - - - 19th December 1991

**THE DOUBLE TAXATION RELIEF (TAXES
ON INCOME) (ICELAND) ORDER 1991**

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

SCHEDULE — CONVENTION
— BETWEEN THE GOVERNMENT OF THE UNITED KINGDOM
OF GREAT BRITAIN AND NORTHERN IRELAND AND
THE GOVERNMENT OF THE REPUBLIC OF ICELAND
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:

ARTICLE I

Personal scope

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

ARTICLE 2

Taxes covered

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

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ARTICLE 3

General definitions

1. In this Convention, unless the context otherwise requires:
2. As regards the application of this Convention by a Contracting...

ARTICLE 4

Fiscal domicile

1. In this Convention, the term “resident of a Contracting State”...
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 establishments

1. In this Convention, the term “permanent establishment” means a fixed...
2. The term “Permanent establishment” includes especially: (a) a place of...
3. A building site or construction or installation project constitutes a...
4. Notwithstanding the preceding provisions of this Article, the term “permanent...”
5. Notwithstanding the provisions of paragraphs (1) and (2) of this...
6. An enterprise shall not be deemed to have a permanent...
7. The fact that a company which is a resident of...

ARTICLE 6

Income from real 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 shall...
2. Subject to the provisions of paragraph (3) of this Article,...
3. In determining the profits of a permanent establishment, there shall...
4. Insofar as it has been customary in a Contracting State...
5. No profits shall be attributed to a permanent establishment by...
6. For the purposes of the preceding paragraphs, the profits to...
7. Where profits include items or capital gains which are dealt...

ARTICLE 8

Shipping and air transport

1. Profits from the operation of ships or aircraft in international...
2. If the place of effective management of a shipping enterprise...
3. Where profits within paragraph (1) of this Article profits are...

4. Notwithstanding the provisions of Article 7 of this Convention profits...

ARTICLE 9

Associated enterprises

1. Where: (a) an enterprise of a Contracting State participates directly...
2. Where a Contracting State includes in the profits of an...

ARTICLE 10

Dividends

1. (a) (i) Dividends derived from a company which is a...
2. Dividends derived from a company which is a resident of...
3. Notwithstanding the provisions of paragraph (2), sub-paragraph (a) of this...
4. The term “dividends” for United Kingdom tax purposes includes any...
5. The provisions of paragraphs (1) or as the case may...
6. Where a company which is a resident of a Contracting...
7. If the beneficial owner of a dividend, being a resident...

ARTICLE 11

Interest

1. Interest arising in a Contracting State which is derived and...
2. The term “interest” for United Kingdom tax purposes includes any...
3. The provisions of paragraph (1) of this Article shall not...
4. Where, by reason of a special relationship between the payer...
5. Any provision in the laws of either Contracting State relating...
6. The provisions of this Article shall not apply if the...
7. The provisions of paragraph (1) of this Article shall not...
8. For the purposes of paragraph (7) of this Article:
9. Where an individual is treated in paragraph (8)(b) of this...

ARTICLE 12

Royalties

1. Royalties derived and beneficially owned by a resident of a...
2. The term “royalties” as used in this Article means payments...
3. The provisions of paragraphs (1) of this Article shall not...
4. Where, by reason of a special relationship between the payer...
5. The provisions of this Article shall not apply if the...
6. The provisions of paragraph (1) of this Article shall not...
7. For the purposes of paragraph (6) of this Article:
8. Where an individual is treated under paragraph (7)(b) of this...

ARTICLE 13

Capital Gains

1. Gains derived by a resident of a Contracting State from...
2. Gains from the alienation of movable property forming part of...
3. Gains from the alienation of ships or aircraft operated in...

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4. Gains derived by an enterprise o a Contracting State from...
5. Gains from the alienation of any property other than that...

ARTICLE 14

Independent personal services

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

ARTICLE 15

Dependent personal services

1. Subject to the provisions of Articles 16, 18, and 19...
2. Notwithstanding the provisions of paragraph (1) of this Article, remuneration...
3. Notwithstanding the preceding provisions of this Article, remuneration derived in...

ARTICLE 16

Directors' fees

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

ARTICLE 17

Artistes and athletes

1. Notwithstanding the provisions of Article 14 and Article 15 of...
2. Where income in respect of personal activities exercised by an...

ARTICLE 18

Pensions, annuities, alimony and social security payments

1. Subject to the provisions of paragraph (2) of Article 19...
2. The term “annuity” means a stated sum payable periodically at...
3. Notwithstanding the provisions of paragraph (1) of this Article, any...

ARTICLE 19

Government service

1. (a) Remuneration, other than a pension, paid by a Contracting...
2. (a) Any pension paid by, or out of funds created...
3. The provisions of Article 15, 16 and 18 of this...

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. Income paid out of trusts or the estates of deceased...
3. The provisions of paragraph (1) of this Article shall not...

ARTICLE 22

Elimination of double taxation

1. Subject to the provisions of the law of the United...
2. (a) Where a resident of Iceland derives income which, in...
3. For the purposes of paragraphs (1) and (2) of this...

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

Mutual agreement procedure

1. Where a person considers that the actions of one or...
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 25

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...

ARTICLE 26

Members of diplomatic or permanent missions and consular posts

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

ARTICLE 27

Entry into force

1. Each of the Contracting States shall notify to the other...
2. This Convention shall enter into force on the date of...

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3. The Agreement between the United Kingdom and Iceland for the...

ARTICLE 28

Termination

This Convention shall remain in force until terminated by one...
In witness whereof the undersigned, duly authorised thereto by their...
Done in duplicate at Reykjavik this 30th day of September...

Explanatory Note